

STATE OF ALABAMA )

JEFFERSON COUNTY )

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**AFFIDAVIT OF IRENE S. BLALOCK**


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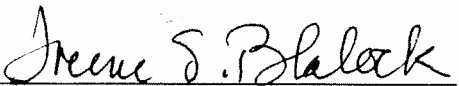
Before me the undersigned Notary Public in and for said County and in said State, personally appeared Irene S. Blalock, who is known to me, and who being by me duly sworn deposes and says as follows:

I am Irene S. Blalock and I am the Director of the Birmingham Public Library. I am over 21 years of age and competent to make this affidavit. I have been the Director of the Birmingham Public Library for about sixteen months. Prior to that, I was an Assistant Director of the Birmingham Public Library for fourteen years. In my capacity as the Director my responsibilities are to coordinate and supervise the employees of the Birmingham Public Library. I have reviewed the Complaint filed by Ms. Barbara Wilson.

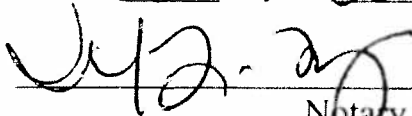
Pursuant to the Birmingham City Code Section 2-5-71, et. al., the Birmingham City Council of the City of Birmingham appoints the Birmingham Library Board members. The Birmingham Library Board's members, who voluntarily serve without salary, set the policies for the management and control of the Birmingham Public Library, its branches, its employees. The Birmingham Library Board hires a Director to

handle day to day activities. The Birmingham Public Library's property, books, etc. are owed by the City of Birmingham.

The Birmingham Public Library Foundation is an independent 501C-3 tax-exempt, nonprofit association that solicits donations for the Birmingham Public Library. The Birmingham Public Library Foundation is not a legal entity, department or agency operating under the authority and control of the City of Birmingham or the Birmingham Public Library. The Birmingham Public Library Foundation plays no role in the management or policy of the Birmingham Public Library, its branches, its employees, property and other library interest. Specifically, the Birmingham Public Library Foundation did not make policy decisions regarding the library and the matters alleged in the Complaint. The Birmingham Library Board is the employer of the Plaintiff, Ms. Barbara Wilson. Neither the City of Birmingham, myself, nor the Birmingham Public Library Foundation are Ms. Wilson's employers.

  
Irene S. Blalock

Sworn to and subscribed before me  
on this 20<sup>th</sup> day of October, 2010



Commission expires

Notary Public  
NOTARY PUBLIC STATE OF ALABAMA AT LARGE  
MY COMMISSION EXPIRES: Feb 28, 2014  
BONDED THROUGH NOTARY PUBLIC UNDERWRITERS