

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

ANAKA HUNTER,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case No: 4:12-CV-4 ERW
	)	
BOARD OF TRUSTEES, Salem Public	)	
Library, and GLENDA WOFFORD,	)	
Individually, and in her capacity as	)	
Director of the Salem Public Library	)	
	)	
Defendants.	)	

**DEFENDANTS' RULE 26 DISCLOSURES**

COME NOW Defendants, the Board of Trustees of the Salem Public Library and Glenda Wofford, by and through their attorneys of record, Baird, Lightner, Millsap and Harpool, P.C., and for their mandatory disclosures pursuant to Federal Rule of Civil Procedure 26 hereby state as follows:

**A. The name and, if known, the address and telephone number of each individual likely to have discoverable information that Defendants may use to support their claims or defenses identifying the subject of the information.**

1. Glenda Wofford is a defendant in this case and is the Director of the Salem Public Library. She is likely to have information regarding the allegations contained in Plaintiff's Complaint and the affirmative defenses set forth in Defendants' Answers and may be contacted through defense counsel.

2. The Board of Trustees of the Salem Public Library is a defendant in this case and its members are likely to have information regarding the allegations contained in

Plaintiff's Complaint and the affirmative defenses set forth in Defendants' Answers. may be contacted through defense counsel. The Board of Trustees consists of the following:

- a. Dr. Wayne Bertz—President
- b. Ruth Ann Parker—Vice-President
- c. William Hubbs—Treasurer
- d. RoseAnn Bray—Secretary
- e. Rhonda McConnell
- f. Joe Brand
- g. Meredith Craig
- h. Elizabeth Condray
- i. Loretta McClure

The Board of Trustees may be contacted through defense counsel.

3. Kate McBride is a librarian assistant at the Salem Public library. She is likely to have information regarding the allegations contained in Plaintiff's Complaint and the affirmative defenses set forth in Defendants' Answers. Her phone number is 573-729-4331.

4. Carol Henry is a librarian assistant at the Salem Public library. She is likely to have information regarding the allegations contained in Plaintiff's Complaint and the affirmative defenses set forth in Defendants' Answers. Her phone number is 573-729-4331.

5. Cathy Benton is a current employee at the Salem Public library. She is likely to have information regarding the allegations contained in Plaintiff's Complaint

and the affirmative defenses set forth in Defendants' Answers. Her phone number is 573-729-4331.

6. Karen Gordon is a former employee of the Salem Public Library. She is likely to have information regarding the allegations contained in Plaintiff's Complaint and the affirmative defenses set forth in Defendants' Answers. Her phone number is 573-729-2474.

7. Barbara Reading is the Division Director for the Missouri State Library. She is likely to have information regarding the allegations contained in Plaintiff's Complaint and the affirmative defenses set forth in Defendants' Answers. Her phone number is (573) 751-2679.

8. Natasha Angell is the Director of Member Services at MOREnet. She is likely to have information regarding the allegations contained in Plaintiff's Complaint and the affirmative defenses set forth in Defendants' Answers. Her phone number is 573-882-9025 and her address is 221 N. Stadium Blvd, Ste. 201, Columbia, Missouri, 65203.

9. Any persons identified or listed in Plaintiff's Rule 26 Disclosures.

Defendants reserve the right to supplement this list of names as further information becomes available or if it is determined through the discovery process that those individuals might have information that support their claims and defenses in this matter.

**B. A copy of, or a description by category and location of, all documents, electronically stored information, and tangible things in the possession, custody or control of Defendants that may be used to support Defendants' claims or defenses.**

1. Any and all documents identified in Plaintiff's Rule 26 Disclosures.

2. Minutes of the Salem Public Library Board of Trustees meetings in November and December of 2010.

3. The Salem Public Library's Public Access Computer Policy, User Agreement, and Waiver forms.
4. Handwritten notes regarding complaints received following the filing of this lawsuit.
5. Handwritten notes regarding Plaintiff's complaints.
6. Log of notes regarding Plaintiff's complaints.
7. Salem Public Library MOREnet service renewals for 2010 and 2011.
8. The June 27, 2011, Sunshine Law request and responses, which have previously been provided to Plaintiff and are therefore not attached.
9. MOREnet announcements sent to general membership.
10. Certificate of Compliance with requirements for library internet usage policy and filtering.
11. Federal Communications Commission Consumer Facts summary regarding the requirements of the Children's Internet Protection Act.
12. Plaintiff's computer use agreement.
13. The Salem Public Library's internet user logs.
14. Staff emails regarding MOREnet and the internet filtration system.
15. Frequently Asked Questions sheet from MOREnet regarding change in the filtration system.
16. MOREnet Internet Content Filtering Order Form.
17. Salem Public Library Ticket Notes regarding customer service calls and inquiries to MOREnet.
18. MOREnet Account Change Log for Salem Public Library.

19. Copy of the sign posted by computers at the Salem Public Library.

Defendants reserve the right to supplement this list of documents as additional documents are discovered or if it is determined through the discovery process that those documents might support Defendants' claims and defenses in this matter.

**C. The computation of any category of damages claimed by this disclosure party, making available for inspection and copying as under Rule 34, the documents or other evidentiary materials, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered.**

Not applicable.

**D. For inspection and copying and under Rule 34, the insurance agreement under which any person carrying on an insurance business may be liable to satisfy parts or all of a judgment which may be entered in the action or should indemnify or reimburse for payment made to satisfy a judgment.**

Defendant will produce a copy of the relevant insurance agreement upon receipt from the carrier.

BAIRD, LIGHTNER, MILLSAP & HARPOOL, P.C.

By 

M. DOUGLAS HARPOOL, Mo. Bar No. 28702  
MATTHEW D. WILSON, Mo. Bar No. 59966  
1901-C South Ventura Avenue  
Springfield, MO 65804-2700  
Telephone (417) 887-0133  
Facsimile (417) 887-8740  
[dharpool@blmhpc.com](mailto:dharpool@blmhpc.com)

Attorneys for Defendants