

CONNIE STICKNEY 8/30/2012

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UNITED STATES DISTRICT COURT
FOR THE
WESTERN DISTRICT OF MISSOURI

ANAKA HUNTER,)
)
Plaintiff,)

) Cause No. 4:12-CV-4ERW

vs.)

BOARD OF TRUSTEES,)
SALEM PUBLIC LIBRARY, et al.,)

)
Defendant.)

DEPOSITION OF CONNIE STICKNEY
Taken on behalf of the Plaintiff
August 30, 2012
Julie K. Kearns, CCR 993

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24 (Whereupon the exhibits were attached to the
25 original and copies.)

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ANAKA HUNTER,)
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Plaintiff,)
) Cause No. 4:12-CV-4ERW
vs.)
)
BOARD OF TRUSTEES,)
SALEM PUBLIC LIBRARY, et al.,)
)
Defendant.)

DEPOSITION OF CONNIE STICKNEY, produced, sworn,
and examined on the 30th day of August, 2012, between the
hours of ten o'clock in the forenoon and three o'clock in
the afternoon of that day, at Midwest Litigation Services,
3432 West Truman Boulevard, Suite 207, Jefferson City,
Missouri, before Julie K. Kearns, a Certified Court
Reporter within and for the State of Missouri, in a
certain cause now pending before the United States
District Court for the Western District of Missouri,
wherein ANAKA HUNTER is the Plaintiff, and BOARD OF
TRUSTEES, SALEM PUBLIC LIBRARY, et al. are the Defendants.

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A P P E A R A N C E S

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The Court Reporter:

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Midwest Litigation Services
3432 West Truman Boulevard, Suite 207
Jefferson City, Missouri 65109
(573) 636-7551

ALSO PRESENT: Nina McHugh

1 IT IS HEREBY STIPULATED AND AGREED, by and
2 between counsel for Plaintiff and counsel for Defendant,
3 that this deposition may be taken in shorthand by Julie K.
4 Kearns, a Certified Court Reporter, and afterwards
5 transcribed into typewriting; and the signature of the
6 witness is expressly reserved.

7 * * * * *

8 (Deposition started at 9:57 A.M.)

9 CONNIE STICKNEY,
10 of lawful age, being produced, sworn and examined on
11 behalf of the Plaintiff, deposes and says:

12 EXAMINATION

13 QUESTIONS BY MR. DOTY:

14 Q. Thank you. We met when we came in. My name is
15 Grant Doty. I'm an attorney for Miss Anaka Hunter, who is
16 the plaintiff in this lawsuit. Could you give your full
17 name for the record, please?

18 A. Okay. My full name is Constance Stickney. I go
19 by Connie.

20 Q. Okay. And you work for MOREnet?

21 A. I do.

22 Q. What's your title?

23 A. Technical Support Services Manager.

24 Q. Okay. And what does a Technical Support
25 Services Manager do?

1 A. I manage technical services.

2 Q. Okay. And you're accompanied by counsel here
3 today?

4 A. Yes.

5 Q. Okay. Have you been deposed before?

6 A. No.

7 Q. Okay. So this shouldn't -- hopefully not be too
8 intimidating, although that's easier for me to say than it
9 is for you. You see we have a court reporter and the
10 court reporter takes our words down, so what's the most
11 important thing to do is to make sure that your answer is
12 verbal, yes or no, versus nodding because it's hard for
13 her to note nods; fair enough?

14 A. Fair enough.

15 Q. Okay. If my questions aren't clear, and, you
16 know, I don't know how long this day will take, hopefully
17 not too long, but there will be times it won't be, please
18 let me know, okay?

19 A. Okay.

20 Q. If you answer, I'm just going to assume that the
21 answer was -- the question was clear.

22 A. Okay.

23 Q. Okay.

24 MR. DOTY: Could we mark this?

25 (Plaintiff's Exhibit No. 1 marked for

1 identification.)

2 Q. (By Mr. Doty) I'm handing you what the court
3 reporter has marked as Exhibit 1. Have you seen this
4 document before?

5 A. Yes.

6 Q. Okay. And what is it?

7 A. It is a command to testify at a deposition.

8 Q. Okay. And you see -- you have seen it before.
9 You see it was served, meaning delivered, to MOREnet on
10 the 14th of August. Do you recall when you saw this
11 document?

12 A. It was that day.

13 Q. Okay. Okay. Could you thumb to the fourth
14 page, which is marked Enclosure 1?

15 A. Yes.

16 Q. Okay. And you see it was mislabeled as dated on
17 the 20th of August, but you do see it's marked as
18 Enclosure 1 and it has seven topics?

19 A. Yes.

20 Q. Okay. Have you been designated to testify on
21 MOREnet's behalf on each of these seven topics?

22 A. Yes.

23 Q. And you're prepared to do that today?

24 A. Yes.

25 Q. Okay. Could you then turn to the next page that

1 is marked enclosure number two? Again, it has the same
2 typographical error stating the 20th of August, but was
3 attached to this subpoena. Have you brought documents
4 responsive to this request?

5 A. Yes.

6 Q. Okay. Do you have copies of those or do you
7 have just one copy?

8 A. I have one copy.

9 Q. Okay.

10 MR. DOTY: Can we -- can we take a break and
11 photocopy those?

12 MS. MARKIE: Yeah. There are some CDs in
13 there as well --

14 MR. DOTY: Okay.

15 MS. MARKIE: -- which will need to be copied.

16 MR. DOTY: Okay. Can I get a copy of those
17 CDs as well?

18 MS. MARKIE: Yes.

19 THE WITNESS: There's one DVD because the
20 document is so large.

21 MR. DOTY: Okay. Great. Why don't we just take
22 a break.

23 (Break in proceedings.)

24 Q. (By Mr. Doty) So we just took about a 40-minute
25 break so that we could get the documents that you filed

1 and there's two CDs that are with us or one CD and one
2 DVD?

3 A. There are one, two -- two CDs and one DVD.

4 Q. Okay. And we'll copy those and get those?

5 A. Yes.

6 Q. Okay. You're still looking at what was marked
7 as Exhibit 1 and are you looking at tab -- or Enclosure 2,
8 which is the document lists?

9 A. Yes.

10 Q. Okay.

11 (Plaintiff's Exhibit No. 2 marked for
12 identification.)

13 Q. (By Mr. Doty) I'm handing you what is marked
14 Exhibit 2.

15 A. Yes.

16 Q. Have you seen -- can you tell me what that is?

17 A. It's an e-mail from Kate Markie to Anthony
18 Rothert explaining that I will be the representative to
19 testify on behalf of MOREnet and I have prepared Enclosure
20 2, which is the attached list of documents.

21 Q. Go ahead. I'm sorry.

22 A. And our interpretation of number three for
23 Enclosure 2 that indicates that we consider the document
24 being requested relates to the Internet Content Filtering
25 Service and specifically Salem Public Library. It also

1 indicates that the documents for the five-year period from
2 2007 to present for general information would be too
3 numerous to pull together and extraneous to the
4 communications and not having anything to do with
5 filtering.

6 Q. Okay. And then if you could turn to page three.
7 Is that the document that you've prepared -- you prepared?

8 A. I prepared this document.

9 Q. Okay. Now, it's dated August 27; is that
10 correct?

11 A. Yes.

12 Q. Is there any changes to this regarding what
13 you -- it's got two headings, what you don't have and what
14 you have. Do you know if, since this e-mail was sent,
15 this document has changed or the documents you have or
16 don't have have changed? Excuse me.

17 A. It appears to be current.

18 Q. Okay. Okay. Could we go to the section that
19 talks about the documents that you have?

20 A. Yes.

21 Q. So let's just -- let's just go bullet by bullet
22 and maybe if you could point me to where in these
23 documents that you produced today they are either located,
24 at what tab or if they're on the CD or DVDs so we can
25 follow.

1 A. Okay. Sure.

2 Q. So the first document of what you have, it says
3 "User activity logs that were sent to Salem lawyers and
4 what we preserved since being notified of the subpoena."
5 Where are those located?

6 A. They would be in the correspondence section on
7 the DVD.

8 Q. Okay. On the DVD?

9 A. Yes.

10 Q. Okay. The second bullet, "Web admin logs since
11 April 2009."

12 A. Oh, it would be under section two. It's an
13 April 30, 2009 to August 24, 2012.

14 Q. What are you looking at right now?

15 A. This is a summary of the tabs and so, if you'll
16 notice, under tab one, each one has a facing page that has
17 a description of what's behind it. So this is just my
18 summary of all those pages.

19 Q. Okay. So if I look at the second tab, Enclosure
20 2 --

21 A. Yes.

22 Q. -- account change logs, that is the web admin
23 logs since April 2009?

24 A. Yes.

25 Q. So tab two?

1 A. Yes.

2 Q. Okay. The third bullet I'm looking at, again,
3 this is on Exhibit 2, it says, "Ticket history since
4 2007."

5 A. Yes. That would be under the communications
6 section.

7 Q. And is that Enclosure 2?

8 A. Enclosure 2, number three.

9 Q. Number three, okay. "Current category
10 definitions and changes made recently as a result of
11 Netsweeper working with the ACLU."

12 A. That would be -- I think that was Enclosure 1,
13 if I'm not mistaken, not an actual document.

14 Q. Enclosure 1?

15 A. Yes. Enclosure 1, number five.

16 Q. And where is Enclosure 1, number five?

17 A. That was information only and not a document to
18 be provided.

19 Q. Oh, okay. So you're going -- you're ready to
20 testify on that, but don't have any documents on that?

21 A. Yes.

22 Q. Okay. The fifth bullet, "Salem Public Library's
23 subscription records to the Internet Content Filtering
24 Service since 2007."

25 A. That's also informational.

1 Q. Okay. No documents?

2 A. No documents, Enclosure 1.

3 Q. "MOREnet's document retention policies."

4 A. That would be Enclosure 2, number one, tab one.

5 Q. Okay. Next bullet, "Instructions provided via
6 e-mail to Salem Public Library."

7 A. That's Enclosure 2, tab three.

8 Q. "Manuals and instructions used by MOREnet
9 support staff since 2009."

10 A. That would be Enclosure 2, number six. And it's
11 on a CD.

12 Q. CD, okay. You said there are two CDs. Are
13 the CDs labeled?

14 A. There are pages within the sleeves that explain
15 what's on the CD.

16 Q. Okay. Great. Thank you. The next bullet says,
17 "E-mail communications."

18 A. That would be Enclosure 2, tab three.

19 Q. Tab three?

20 A. Yes.

21 Q. Okay. The next bullet says, "Service-related
22 communications."

23 A. Enclosure 2, tab three.

24 Q. "E-rate communications."

25 A. Enclosure 2, tab three.

1 Q. Okay. "Financial communications."

2 A. Enclosure 2, tab three.

3 Q. "Current configuration of Salem Public Library,
4 including categories blocked."

5 A. Enclosure 2, tab five.

6 Q. Okay. Next one, "Categories blocked by default
7 in March 2009 and July 2011."

8 A. Enclosure 2, tab four.

9 Q. And then the last bullet that I have on this is,
10 "MOREnet CIPA practices."

11 A. That was enclosure one, information only.

12 Q. So you'll testify to that, not documents?

13 A. Yes.

14 Q. Okay. Great. Thank you for that. So what
15 we're going to do is we're going to go by the topics and I
16 think, with the exception of topic one which talks about
17 document retention, we should finish one and move right on
18 to the next --

19 A. Okay.

20 Q. -- fair enough? All right. So if we go to the
21 subpoena, which was Exhibit 1 and you look at enclosure
22 number one, the first subject is MOREnet's document
23 retention policy including logs of what websites Salem
24 Public Library blocks and unblocks. You're designated to
25 testify on that subject?

1 A. Yes.

2 Q. Okay. And you're prepared to testify on that?

3 A. Yes. The question wasn't clear.

4 Q. Yes. Did you get my response that I e-mailed to
5 Miss Markie?

6 MS. MARKIE: I sent it to you yesterday.

7 A. Yes.

8 Q. (By Mr. Doty) Okay. I want to make sure that the
9 questions are clear. So in the normal course of business,
10 my interest is how long you will maintain certain
11 documents.

12 A. Okay.

13 Q. Do you understand? That's really what I mean by
14 this.

15 A. Okay. I understand.

16 Q. The related question to that would be at some
17 point you became aware of this litigation and said, you
18 know, we're going to set aside these documents, so it's
19 possible that you saved documents that are beyond your
20 normal saving because of the lawsuit, so that would be a
21 second question.

22 A. Yes.

23 Q. You said that your -- for your document
24 retention policies, that they are located in your
25 documents here at tab -- at tab one?

1 A. Yes.

2 Q. Okay. Can you look at that tab? It looks like
3 it's printed from a web page.

4 A. Yes.

5 Q. Okay. Is this something that the public can
6 access or is this your internal web page that you printed?

7 A. It's publicly accessible.

8 Q. It is. Okay. Does your document retention
9 policy, is it dependent upon the client?

10 A. What do you mean by client?

11 Q. People who get internet service from you or
12 filtering service from you. In other words, do you save
13 documents on a schedule that is different for each client
14 if a client requests something different?

15 A. No. For our -- no. For our services, everybody
16 is the same.

17 Q. Everyone is the same. Okay. So if I read this
18 and it says you'll retain a document for a period of three
19 years --

20 A. Yes.

21 Q. -- Salem would be saved for three years, it
22 wouldn't be anything different for Salem?

23 A. Correct.

24 Q. Okay.

25 MS. MARKIE: If I could interject?

1 MR. DOTY: Sure.

2 MS. MARKIE: With one exception, and that is
3 since we got the subpoena, there are documents that would
4 otherwise be destroyed which have not been.

5 THE WITNESS: Oh, I'm sorry, that's true.

6 MR. DOTY: Okay.

7 A. The log files we kept once we were notified of
8 the subpoena.

9 **Q. (By Mr. Doty) Okay. Log files?**

10 A. The user activity logs.

11 **Q. Okay. User activity logs. So what is the**
12 **normal time that a user activity log would be --**

13 A. Approximately two weeks.

14 **Q. About two weeks, okay. And you saved them**
15 **beyond that point when you got the subpoena, which is**
16 **marked as Exhibit 1, or at some previous point did you**
17 **learn from Salem that there was a pending lawsuit that you**
18 **saved the documents?**

19 A. We started savings the documents when we got the
20 subpoena.

21 **Q. So August 14?**

22 A. Yes.

23 **Q. Okay. And -- on those user activity logs and**
24 **you've produced those for us today?**

25 A. Yes.

1 Q. Okay.

2 MS. MARKIE: But I should also say, unless
3 directed otherwise, they will probably start being
4 destroyed after today.

5 MR. DOTY: Okay. But we have these -- I mean,
6 we have the copies of the ones that exist.

7 MS. MARKIE: Right. As of yesterday.

8 THE WITNESS: Yes.

9 Q. (By Mr. Doty) I'm going to -- I'm going to ask --
10 it's a related question because I want to know about these
11 user activity logs and we'll certainly get to these.
12 There's a lot of different language that I've seen
13 regarding logs and I'm wondering whether or not we're
14 throwing around the same terms. Can you correct me?

15 On that Exhibit 2, which is the e-mail that
16 Miss Markie sent me and it had the attachment that you
17 had, I see at the very top, the first bullet of what you
18 don't have that talks about user activity logs?

19 A. Yes.

20 Q. Okay. All right. And now if I go down to the
21 first bullet of -- or, excuse me, the second bullet, where
22 it says, "Web admin logs."

23 A. Yes.

24 Q. Are those two different things?

25 A. They are two different things.

1 Q. Okay. How about on that same page, "Web admin
2 change logs"? Is that something different?

3 A. The web admin change logs are the same as the
4 web admin logs.

5 Q. Okay. But those are different than the user
6 activity logs?

7 A. Yes.

8 Q. Okay. Is user activity meaning a patron who
9 goes to the library and tries to visit a website, there's
10 a tracking for that for a period, you do track that?

11 A. That's what the user activity logs are.

12 Q. And the web admin log, then the change log, that
13 is any changes they make to blocking or unblocking?

14 A. Yes.

15 Q. Okay. And we'll talk about those forms later,
16 but those are two different things?

17 A. Yes.

18 Q. What you are maintaining for two weeks are
19 knowing what websites are visited from each of the
20 computers of your users?

21 A. Correct.

22 Q. Okay. For the web admin change log, the
23 separate document, how long are those documents
24 maintained?

25 A. We have them back until April 2009.

1 Q. And the significance of that date. What
2 happened on -- why April 2009?

3 A. We changed solutions, so we also changed servers
4 at that time and the old servers were wiped clean.

5 Q. Is that also the date that Netsweeper became the
6 service provider?

7 A. Yes.

8 Q. Okay. Is that why that change happened?

9 A. Yes.

10 Q. Okay. And so those are maintained permanently?

11 A. I don't know.

12 Q. Okay. Is that in this document retention
13 policy, reference to web admin logs?

14 A. No, it's not.

15 Q. Okay. And you've produced to us the web admin
16 log since April 2009, those are in tab two?

17 A. Yes.

18 Q. In -- your first bullet here, we're just talking
19 about retention now, it says, "User activity logs" -- you
20 have these, "User activity logs that were sent to Salem
21 lawyers"?

22 A. Yes.

23 Q. Okay. When were those sent to Salem lawyers?

24 A. February 22.

25 Q. Okay. Of 2000 --

1 A. 2012.

2 Q. Okay. Do you have those documents?

3 A. Yes. They are in here.

4 Q. They are in this and they're in the -- they're
5 in the DVD that you produced to us?

6 A. They are on a separate CD under tab three.

7 Q. Tab?

8 A. Three.

9 Q. Tab three CD, okay. If you go again to the
10 subpoena, the first subject says, "MOREnet's document
11 retention policies including logs of what websites Salem
12 Public Library blocks or unblocks." So I want to focus in
13 on that -- those logs. What's that log called?

14 A. The logs for the Salem Public Library, what they
15 block and unblock?

16 Q. Yes.

17 A. That would be the web admin logs.

18 Q. That's the web admin change logs?

19 A. Yes.

20 Q. Okay. And you have those from April of 2009?

21 A. Yes.

22 Q. Okay. How does -- how on those -- I'm talking
23 about this, what websites Salem blocks or unblocks -- does
24 MOREnet know that? How does MOREnet know that when a user
25 sits down and I type into the computer and I say I want to

1 search for, you know, the Republican party and all of a
2 sudden it blocks, I mean, I see a block, how does MOREnet
3 know that that block happened?

4 A. We would have to go through the user activity
5 logs.

6 Q. The user activity logs would say there was a
7 block?

8 A. I think so.

9 Q. Okay. How would we find that out for certain?
10 I mean, I'm not trying to force you to give an answer.
11 You know, you said you think so, but how would we get the
12 answer to that?

13 A. You would have to look on the DVD that has the
14 user activity logs.

15 Q. Okay.

16 A. And look for a word that says blocked.

17 Q. Some form of blocked?

18 A. Yes.

19 Q. Okay. Okay. You produced that on a CD, which
20 I -- I mean, I'm not visually looking at it at this point.
21 Does that include codes that I can somehow determine what
22 the different -- the different things mean?

23 A. It won't interpret it for you.

24 Q. It won't. Is there something that would
25 interpret it for us? If I go back to the office and I try

1 to find these things and I'd like to find out what a
2 particular code is, is there a manual?

3 A. I don't know. I'd have to go back to the vendor
4 and ask.

5 Q. Okay. All right.

6 MR. DOTY: Miss Markie, I mean, if we do find
7 that, can we come back to you and ask for particular codes
8 to try to interpret those things?

9 MS. MARKIE: I mean, if you wanted to subpoena
10 it or --

11 MR. DOTY: Okay.

12 MS. MARKIE: I mean, I don't know if it's
13 something that we have.

14 MR. DOTY: Okay.

15 MS. MARKIE: And obviously Miss Stickney doesn't
16 know.

17 MR. DOTY: All right.

18 Q. (By Mr. Doty) It may not be necessary. It may be
19 fully clear that it says website blocked and that is not
20 necessary to try to interpret that, but -- okay. Does
21 MOREnet presume -- in terms of trying to figure out
22 whether or not something was blocked, in other words
23 documentation that would be retained or not retained, does
24 MOREnet assume that if a website is in a category that's
25 blocked, do you presume that it's blocked?

1 A. Yes, we would have to presume that.

2 Q. Okay. Okay. Well, that's -- normally when we
3 move on to a topic, you know, I'm not going to come back
4 to it, but this is a case where I have, sort of, documents
5 that I'm going to end up showing you later. Is it all
6 right when we get to those documents that you can tell me
7 that this is a document that would be retained or wouldn't
8 be retained in a certain period of time as opposed to
9 going through them all now?

10 A. Sure.

11 Q. It just -- as we get to it, I'll say look at
12 this document, is this a document that you would retain.

13 A. Okay.

14 Q. Very good. So let's go on to topic number two,
15 which is in the subpoena, enclosure number one, which I'm
16 going to read it. It says, "Salem Public Library's
17 internet content filtering subscription with MOREnet
18 since -- from 2007." Are you designated to testify on
19 that subject?

20 A. Yes.

21 Q. Okay. And you're prepared to do so?

22 A. Yes.

23 Q. Okay. We went through the documents. So the
24 documents -- that's the fifth bullet on the e-mail that
25 you -- or the attachment to the e-mail on -- which is

1 **Exhibit 2.**

2 A. Which section?

3 **Q. The bottom, what you have.**

4 A. What we have? Oh, okay.

5 **Q. And you told me earlier that this is -- you**
6 **didn't produce documents, but you have information on this**
7 **subject?**

8 A. Yes.

9 **Q. Okay. All right. Tell me what you know about**
10 **Salem's subscription.**

11 A. They --

12 **Q. Go ahead.**

13 A. Since 2007, they've subscribed to the service.
14 They usually purchase 16 to 18 licenses and they've
15 renewed every year since.

16 **Q. Okay. This question deals with Internet Content**
17 **Filtering. Is that a separate service versus internet**
18 **hosting? What's the difference between those two?**

19 A. Internet Content Filtering filters websites
20 based on a certain set of criteria. Internet hosting is
21 where a -- I'm guessing you're talking about service
22 hosting --

23 **Q. Yes.**

24 A. -- where we would host a particular service, it
25 could be any service, on our infrastructure.

1 Q. Okay. When Salem goes and they buy something
2 from MOREnet, are they buying access to the internet and
3 filtering or is it like a bundle? I mean --

4 A. They can buy them separately.

5 Q. Okay.

6 A. Or they can buy them as part of a membership
7 bundle.

8 Q. Do you know how they buy it?

9 A. Let me clarify. The membership bundle includes
10 internet connections and services. The Internet Content
11 Filtering Service is purchased separately as a fee-based
12 service.

13 Q. Okay. Great. And you said that they've bought
14 the Internet Content Filtering Service during this whole
15 period from 2007 to the present?

16 A. Correct.

17 Q. Do you know if it comes -- you mentioned bundle.
18 Is there no bundle for this?

19 A. No. It's purchased separately.

20 Q. It's purchased separately. Okay. But it's --
21 so a library could say I just want the access, I don't
22 want you to provide the filtering?

23 A. Correct.

24 Q. Okay.

25 (Plaintiff's Exhibit No. 3 marked for

1 identification.)

2 Q. (By Mr. Doty) I've handed you what has been
3 marked Exhibit 3.

4 A. Okay.

5 Q. Do you recognize that?

6 A. Yes.

7 Q. Can you tell us what that is?

8 A. This is a Service Renewal Notice to Glenda Brown
9 at Salem Public Library to renew the Internet Content
10 Filtering Service and she has replied they are going to
11 renew with 16 internet-accessible computing devices.

12 Q. Okay. And what's the date of -- so we can
13 identify this, what's the date that Miss Brown responded?

14 A. April 6, 2009.

15 Q. Okay. So you said they renewed every year since
16 2007. This is how they would do it, they would renew
17 normally via e-mail?

18 A. Yes.

19 Q. Okay. Some notice was sent out?

20 A. Yes.

21 (Plaintiff's Exhibit No. 4 marked for
22 identification.)

23 Q. (By Mr. Doty) Okay. Here's another document I've
24 marked Exhibit 4. Do you recognize that?

25 A. Yes.

1 Q. Is it the same renewal type form?

2 A. Yes. It's the same form.

3 Q. And what's the date on that one?

4 A. April 6, 2010.

5 Q. Okay. And that Service Renewal reference in the
6 e-mail that MOREnet, Miss Kelly Allers, sent to
7 Miss Brown?

8 A. Yes.

9 Q. It says -- so this is renewing for the period of
10 July 1, 2010 to June 30, 2011?

11 A. Yes.

12 Q. Okay. All right. One of the documents talks
13 about calling it MOREnet-hosted ICF?

14 A. Yes.

15 Q. Okay. This means the Internet Service Content
16 Filtering that Salem has ordered is MOREnet hosted?

17 A. Yes.

18 Q. Okay. What does hosted mean?

19 A. It means we hold it or we have installed it on
20 our servers and they come to our servers to get the
21 filtering.

22 Q. Okay. That doesn't mean it's your filter,
23 though; is that correct?

24 A. I'm sorry?

25 Q. Who's the -- I guess I'm trying -- Netsweeper,

1 what is Netsweeper's role? You're hosting the internet
2 content filter?

3 A. Yes.

4 Q. What is Netsweeper -- if you're the host, what
5 is Netsweeper?

6 A. Netsweeper is the vendor we purchase the
7 software from.

8 Q. Okay. Okay. And in this period that we're
9 talking here, which is 2007 to the present, when did
10 Netsweeper become your vendor for Internet Content
11 Filtering?

12 A. 2009.

13 Q. Okay. Prior to that it was?

14 A. SmartFilter.

15 Q. Okay. And was SmartFilter all the way, this
16 period that we're discussing here, 2007 forward?

17 A. Forward?

18 Q. 2007 to 2009 when Netsweeper took over?

19 A. SmartFilter was not a part of it.

20 Q. It was not a part of it?

21 A. We didn't have SmartFilter. Is that what you're
22 asking?

23 Q. You said you had SmartFilter, though, before
24 Netsweeper?

25 A. Yes.

1 Q. Okay. Was SmartFilter the filter you had back
2 in 2007?

3 A. Yes.

4 Q. Okay. So during this period of -- this period
5 we're talking of 2007 to the present, there's only been
6 two vendors?

7 A. Correct.

8 Q. First was SmartFilter, which would have been
9 from 2007 to 2009, and then Netsweeper from that time
10 forward?

11 A. Correct.

12 Q. Okay. If MOREnet hosted ICF, what is
13 member-hosted ICF?

14 A. Member-hosted is where our member, a MOREnet
15 member, can buy the service and we would send them a file
16 to install on their own servers within their own
17 buildings.

18 Q. Okay. You send them Netsweeper?

19 A. We give them access to an installation file.

20 Q. Okay. Is that installation file, though, do you
21 give them an option of can it be Netsweeper or anybody
22 else or is it just Netsweeper?

23 A. Just Netsweeper.

24 Q. Okay. Can a member choose not to have Internet
25 Content Filtering?

1 A. Yes.

2 Q. Okay. Has Salem ever had -- made that choice of
3 not having their filter?

4 A. Since 2007, they've always had our filter. I
5 don't know what else they've done.

6 Q. Okay. During this period -- when you start off
7 by saying they've had Internet Content Filtering through
8 MOREnet since 2007 and has renewed every year, has it
9 always been the MOREnet-hosted or have they ever had
10 member-hosted?

11 A. As far as I'm aware, it's always been
12 MOREnet-hosted.

13 Q. MOREnet-hosted, okay. So that means it resides
14 on your server?

15 A. Yes.

16 Q. Okay. I just -- it's not that you're not clear,
17 I just want to make sure that I understand this.
18 MOREnet-hosted filtering, Netscape (sic) software only
19 resides on your server or does it push down to the
20 computers in the Salem Public Library?

21 A. Netsweeper resides on our servers and then we
22 configure their router so that any traffic coming out of
23 the member organization points to our server.

24 Q. Okay. I understand that. What is -- have you
25 heard of Century Guard?

1 A. Yes.

2 Q. Is that an Internet Content Filtering?

3 A. They've changed over the years. I'm not sure
4 what they are now.

5 Q. Okay. Is that something that MOREnet provides?

6 A. No.

7 Q. So if Salem Public Library had Century Guard, is
8 that something they would add on top of the Internet
9 Content Filtering you already have?

10 A. They could.

11 Q. And is that something --

12 (Plaintiff's Exhibit No. 5 marked for
13 identification.)

14 Q. (By Mr. Doty) I've handed you what is marked as
15 Exhibit 5 and I'm going to -- I'm not going to ask you to
16 identify it, but I want you to turn to page two and
17 there's some dates there and if you can look at the --
18 there's an entry there for November 12, 2010. Do you see
19 that?

20 A. Yes.

21 Q. Okay. Can you just take a moment and read that
22 for me?

23 A. Out loud or --

24 Q. No, no, no. Just to yourself. Just to
25 yourself.

1 MR. HARPOOL: I'm sorry, what date?

2 MR. DOTY: November 12.

3 MR. HARPOOL: Of '10?

4 MR. DOTY: 2010. It should be the second page.

5 MR. HARPOOL: I got it. Thanks.

6 Q. (By Mr. Doty) When you're done, just let me know.

7 A. Okay. I'm finished.

8 Q. Okay. So what I was looking at on that entry on
9 November 12 is this description, which says -- I'm going
10 to represent to you that Miss Brown wrote this. "I
11 explained that we had Century Guard on all of our
12 computers and that it would be difficult to unblock each
13 day because the computer was turned off -- when the
14 computer was turned off the settings would go back to
15 their original state."

16 Now -- and again, you read the whole thing, so
17 this is Miss Brown, she's talking to the state librarian
18 about a complaint that they've received about blocking.
19 And so this Century Guard that she's referring to on each
20 of the computers, that was not provided by MOREnet?

21 A. No, it was not.

22 MR. HARPOOL: I'm going to object to this
23 characterization of what this means and what it -- how
24 you're interpreting it.

25 MR. DOTY: Okay. All right.

1 MR. HARPOOL: Go ahead and answer it.

2 MR. DOTY: Fair enough.

3 Q. (By Mr. Doty) Century Guard is not something
4 MOREnet provides to its -- to your customers?

5 A. Correct.

6 Q. Okay. Does it prevent your customers from
7 putting on additional filtering at their own -- on their
8 own computers? Is that a problem?

9 A. Century Guard, does it prevent it, is that what
10 you're asking?

11 Q. No. I'm saying does MOREnet, as part of its
12 licensing when you sell Internet Content Filtering, do you
13 tell your customers you're not allowed to put any other
14 filtering on your computers?

15 A. No, we don't say that.

16 Q. They can do that?

17 A. They can.

18 Q. Does that -- that's not illegal from your
19 perspective, from propriety reasons?

20 A. No, it's not.

21 Q. Okay. All right. From a technical perspective,
22 does that affect the filtering?

23 A. It could.

24 Q. That you provide, that MOREnet provides?

25 A. It could.

1 **Q. It could affect it. And how would we find out**
2 **that answer if it would affect that?**

3 A. It would depend on how it was installed at the
4 organization in relation to how they get their connection.
5 So there would be like a path. If somebody went to a
6 website, they would have to go through a certain path to
7 get out to the internet.

8 **Q. And how would that affect MOREnet's provision of**
9 **their Internet Content Filtering Service?**

10 A. It could filter it first or sometimes those
11 things conflict.

12 **Q. And as a technical person, what would you need**
13 **to look on the computer -- or where would you look to**
14 **figure out if that might happen?**

15 A. I would look on the computer they were using. I
16 would also look at any kind of configurations on a
17 firewall or a router.

18 **Q. Is that -- would that be in the configuration of**
19 **the -- each individual computer?**

20 A. If it were installed directly on the computer,
21 it would be on the configuration of the computer. Not all
22 software is installed directly on the computer.

23 **Q. Where would they install that? What would be**
24 **the alternative to -- excuse me. What would be the**
25 **alternative to installing it on each of the computers?**

1 A. Installing it on a server --

2 Q. Okay.

3 A. -- that the computers connect to.

4 Q. MOREnet has the server for the Salem Public
5 Library; is that correct?

6 A. We provide Internet Content Filtering Service to
7 the Salem Public Library on our servers.

8 Q. Could there be another server that had this
9 Century Guard or other software?

10 A. Yes, there could be.

11 Q. There could. Okay. That's all I have for topic
12 two.

13 A. Okay.

14 Q. Topic three. And again, I'm reading from
15 Exhibit 1. Enclosure number one on topic three says,
16 "Categories and websites blocked by MOREnet as a default
17 for the Salem Public Library from 2007 to the present."

18 A. Okay.

19 Q. Are you designated to testify on that subject?

20 A. Yes.

21 Q. Okay. And prepared to testify?

22 A. Yes.

23 Q. Okay. I'm now turning to Exhibit 2, which was
24 the e-mail that Miss Markie sent --

25 A. Yes.

1 Q. -- and your sheet dated the 27th. And if my
2 notes are correct -- do you have documents on this
3 subject?

4 A. Yes, we do.

5 Q. And where are those located?

6 A. Tab four.

7 Q. Yes. The second bullet from the bottom. Okay.
8 So you have those at tab four.

9 (Plaintiff's Exhibit No. 6 marked for
10 identification.)

11 Q. (By Mr. Doty) I'm handing you what has been
12 marked Exhibit 6. Can you tell me what that is?

13 A. That is an FAQ for MOREnet members migrating to
14 Netsweeper.

15 Q. What's the date on that?

16 A. March 2009.

17 Q. So this is at the point in which you were --
18 MOREnet was changing from SmartFilter to Netsweeper?

19 A. Yes.

20 Q. Okay. So this subject has to do with the
21 categories blocked by MOREnet?

22 A. As a default, yes.

23 Q. As a default. Looking at this Exhibit 6 on that
24 first page, do you see those -- what I counted was 28
25 categories?

1 A. Yes.

2 Q. Okay. And those were -- those were default
3 blocks?

4 A. At that time.

5 Q. Okay. Okay. And there's a category on there,
6 criminal skills?

7 A. Yes.

8 Q. Okay. Occult?

9 A. Yes.

10 Q. Among others. Okay. How long -- you said at
11 the time those were the 28 default categories. When -- do
12 you know when those categories, the default categories,
13 changed?

14 A. I don't know.

15 Q. These are not the default categories today?

16 A. No, they're not.

17 Q. Okay.

18 (Plaintiff's Exhibit No. 7 marked for
19 identification.)

20 Q. (By Mr. Doty) I just handed you what has been
21 marked Exhibit 7. Do you recognize this document?

22 A. Yes, I do.

23 Q. Okay. And can you tell me what it is?

24 A. It is an Internet Content Filtering Order Form
25 signed by Glenda Wofford for the Salem Public Library

1 indicating an additional category to be blocked called web
2 chat.

3 Q. Okay. And again, on this topic of what was the
4 default, what were -- how many categories were by default
5 blocked at this point of time which -- what's the date of
6 the form there at the very bottom left?

7 A. July 31, 2011.

8 Q. Okay. And how -- what were -- how many default
9 categories were blocked?

10 A. Five.

11 Q. Okay. And is occult on there?

12 A. No.

13 Q. Or criminal matters?

14 A. No.

15 Q. Okay. So sometime between that first of April
16 of 2009 when Netsweeper first came on board and July of
17 2011 you went from 28 default categories down to five?

18 A. Correct.

19 Q. Do you know the genesis of that change from 28
20 to five?

21 A. It was because of lawsuits from the ACLU and we
22 determined that we were blocking too many categories by
23 default and so we decided to only block those that -- by
24 default that was considered harmful.

25 Q. Okay. And that definition of harmful was based

1 on -- do you know? Do you know what the --

2 A. CIPA compliance.

3 Q. And what is CIPA?

4 A. CIPA is Children's Information Protection Act or
5 something like that.

6 Q. Okay. And so by blocking these five, they were
7 in compliance with CIPA and it was, in effect,
8 overblocking with the 28?

9 A. I don't know that I would call it overblocking,
10 but -- because they can change them.

11 Q. Okay. The individual subscribers can pick and
12 choose --

13 A. Yes.

14 Q. -- additional categories as, on this Exhibit 7,
15 Miss Wofford picked one additional category, web chat?

16 A. Right.

17 Q. Okay. Could she have picked occult?

18 A. She could have.

19 Q. And she could have picked criminal skills?

20 A. Yes.

21 Q. But in this August of 2011 did not?

22 A. Correct.

23 (Plaintiff's Exhibit No. 8 marked for
24 identification.)

25 Q. (By Mr. Doty) So I've handed you what has been

1 marked Exhibit 8.

2 A. Yes.

3 Q. Okay. You want to take a moment just to look it
4 over? Do you recognize this document?

5 A. Yes, I do.

6 Q. And what is it?

7 A. It is an e-mail correspondence between Craig
8 Nichols and Glenda Wofford trying to determine how to
9 block or unblock certain websites.

10 Q. Okay. I think it's clear, but at some point
11 Glenda's name changed. You see her e-mail there as Glenda
12 Brown?

13 A. Yes.

14 Q. You know we're talking about the same person?

15 A. Yes.

16 Q. Okay. If you take a look near the bottom of
17 that e-mail, which was an e-mail from Craig Nichols to
18 Miss Wofford on the -- it should be the bottom of the
19 first page, I think.

20 A. Okay.

21 Q. And the time is 2:59 P.M., do you see that
22 e-mail?

23 A. Yes, I do.

24 Q. Okay. Craig Nichols, he's an employee of
25 MOREnet?

1 A. Yes, he is.

2 Q. Is he still there?

3 A. Yes, he is.

4 Q. Okay. So just read what his e-mail -- his first
5 paragraph says there to her.

6 A. "It appears you have the old standard of
7 categories selected which is about double what our current
8 default filtering is normally set to for a library." And
9 he's asking do you want to change it.

10 Q. Okay. So this e-mail happened somewhere between
11 that April 9, 2009 date, which had 28 categories, and then
12 the July 31 options which gave her five default
13 categories. Do you know how we would find out when that,
14 quote, old standard of categories was changed?

15 A. I don't know how we'd find out other than the
16 documentation I've already provided.

17 Q. Okay. In that sentence, the first sentence, it
18 says, "Normally set to for a library?"

19 A. Yes.

20 Q. Would there be different defaults for different
21 organizations?

22 A. We filtered libraries different from schools.
23 Schools tend to have more strict criteria.

24 Q. Okay. And do you know why that is, why schools
25 would be more strict than libraries?

1 A. Probably to protect the kids more, they have
2 more kids.

3 **Q. Okay. Is -- okay. We'll talk about CIPA on a**
4 **separate topic, but you're saying there is a difference**
5 **between libraries and schools. Does that difference exist**
6 **today?**

7 A. I'm not sure. No, everyone gets the same five
8 categories. Is that what you're asking?

9 **Q. Yes. Yes. Okay. So it's the same. But at the**
10 **time of this e-mail, there was some difference between**
11 **libraries and schools?**

12 A. Yes.

13 **Q. All right. Do you know whether or not MOREnet**
14 **might have misassigned the Salem Library a school**
15 **filtering as opposed to a library filtering, I mean from**
16 **looking at their -- from looking at what you did block?**

17 A. This shows what we blocked as a default. I
18 don't know what was actually blocked.

19 **Q. Okay. You don't -- say that one more time.**

20 A. I don't know what was actually blocked. This
21 indicates what we blocked as a default, part of our
22 policy, but I don't know what was actually blocked.

23 **Q. Could it have been blocked as a default and then**
24 **not blocked?**

25 A. At some point, yeah.

1 Q. But at the default -- would you have not
2 followed your client's -- the customer's request to block?

3 A. If the customers request us to block or unblock,
4 we would follow their wishes.

5 Q. Okay. So you're saying you don't know if there
6 was changes they made?

7 A. Correct.

8 Q. Outside of their -- so the default that you had,
9 that initial 28 categories that were assigned, they may
10 have gone in and modified it themselves later?

11 A. Yes.

12 Q. Okay. And we'll talk about how they can do that
13 in a separate topic.

14 A. Okay.

15 Q. Okay. So let me just see if I got this right.
16 There were 28 categories on the first of April of 2009?

17 A. Yes.

18 Q. Okay. And then on the subscription that
19 happened on August 1 of 2011, when Miss Brown returned the
20 form of -- from July 2011, there were five categories?

21 A. Yes.

22 Q. She added a category?

23 A. Yes.

24 Q. So there would have been six categories and in
25 that in-between spot when Craig Nichols e-mailed, Craig

1 did something to reduce the number of categories that had
2 been blocked?

3 A. It looks like he made changes to the categories
4 blocked.

5 Q. Okay. And would we be able to see that on the
6 account change log?

7 A. The account change log won't show categories
8 blocked or unblocked. It only shows websites.

9 Q. Okay. All right. But those would be -- those
10 would be different than the defaults? Again we're going
11 to talk about changes that happened later, but these are
12 the defaults.

13 A. These are the defaults.

14 Q. Okay. All right. That's all I have for topic
15 number three.

16 A. Okay.

17 Q. So we're bouncing back so we have a frame of
18 reference. Exhibit 1 was the subpoena, I'm looking at
19 Enclosure 1 and the fourth topic, I'm going to read it is,
20 "Categories and websites blocked by Salem Public Library
21 from 2007 to the present. For example, such as those
22 specified on MOREnet-hosted Internet Content Filtering
23 Order Form signed by Miss Glenda Wofford for the Salem
24 Public Library on August 1, 2011." Are you designated to
25 testify on that subject?

1 A. Yes.

2 Q. Okay. And you're prepared to do so?

3 A. Yes.

4 Q. All right. And in terms of documents, can you
5 tell me where those are in the documents that you
6 produced?

7 A. Section five.

8 Q. Okay. Okay. On that subject or that topic
9 four, it says that MOREnet-hosted Internet Content
10 Filtering Form signed by Miss Wofford on August 1, do you
11 see that is the document that we marked as -- right there,
12 we marked that as Exhibit 7? So we've talked about that
13 specific one.

14 A. Yes.

15 Q. So this was a case where she added web chat?

16 A. Yes.

17 Q. Okay. That's the document that you produced --

18 A. Yes.

19 Q. -- today for that? Do you know of any
20 additional categories that they blocked during this period
21 from 2007 to the present?

22 A. I wouldn't know.

23 Q. I mean, did you review the documents to try to
24 figure out -- I mean, on the subject of this, do you know
25 of any other topics that they've done?

1 A. We don't have records of what they've changed
2 since 2007.

3 Q. When -- at what point do you have the records of
4 what they've changed?

5 A. We have the initial set of defaults in March of
6 2009 and then we have the form dated August 1 indicating
7 the changes they want made.

8 Q. Okay. So you have no other written
9 documentation?

10 A. The e-mail from Craig Nichols to Glenda talking
11 about the changes that they were making at the time.

12 Q. Okay. Can we go to Exhibit 6?

13 A. Yep.

14 Q. This -- the heading is Frequently Asked
15 Questions for MOREnet Members Migrating to Netsweeper?

16 A. Yes.

17 Q. Okay. This is the one that had the 28
18 categories on it?

19 A. Yes.

20 Q. Okay. If you could look at the bottom of that
21 document on the first page, it begins with the, "If you
22 would like." Can you read that for me aloud?

23 A. "If you would like your custom block and allow
24 lists to be added to Netsweeper, you will need to copy and
25 paste this information into Netsweeper. To do this, log

1 into the SmartFilter server that was originally assigned
2 to your organization," it gives the names of the servers,
3 "and go to Create Custom Lists."

4 Q. Okay. Then if you look on the next page, it
5 shows how they'll cut and paste into a spreadsheet?

6 A. Yes.

7 Q. And it looks like, then, what they're cutting
8 and pasting is, what, additional sites that they want
9 blocked?

10 A. Blocked or allowed.

11 Q. Okay. Do you have any documentation from Salem
12 that they, in fact, did this? Did they, in fact, create a
13 custom list upon the migration from SmartFilter to
14 Netsweeper?

15 A. I don't know.

16 Q. Okay. And how would we find that out?

17 A. We wouldn't be able to.

18 Q. You don't know what happened on the 2009
19 migration?

20 A. They would have had to do this themselves and I
21 don't know what they did.

22 Q. Okay. I see. So they would then create that
23 spreadsheet and then -- I'm now looking at page two --
24 they would log in themselves to the tigers.more.net
25 website and they would make changes --

1 A. Yes.

2 Q. -- that would do that? This would show up on
3 the account change log if they logged on to
4 tigers.more.net?

5 A. I'm not sure.

6 Q. Do you have -- I recall that you testified,
7 correct me if I'm wrong, that you actually do have the
8 account change log all the way back to April 2009?

9 A. Yes, we do.

10 Q. So, I mean, if they did it and it logged, you
11 would have a copy of that?

12 A. Yes.

13 Q. And is it produced here?

14 A. It is.

15 Q. And what enclosure?

16 A. Number two.

17 Q. Do you know what we're looking for? I'm in --
18 do you see the first entry has April 30?

19 A. Yes.

20 Q. Okay. Do you know what I would look for to see
21 whether or not Salem logged on and did this process that
22 was described in Exhibit 6?

23 A. You would look for the user name 3206 and some
24 kind of activity that indicated they logged on, but I
25 don't know if it would show if they uploaded a file or

1 not.

2 Q. So why are you looking for 3206 -- I see that in
3 the user name. There's a number of what appears to be
4 user names, like "wallr"?

5 A. Yes.

6 Q. Nichols something, T maybe?

7 A. Yes.

8 Q. So what is 3206?

9 A. 3206 is the log-in account that we gave them
10 when we set them up.

11 Q. Okay. And what is the PM after the -- some of
12 them there's PM and some there's not.

13 A. I don't know what that means.

14 Q. Okay. I see on like May 8 there, May 8 at 9:43,
15 Nichols updated some category selection?

16 A. Yes.

17 Q. Is that what I'm looking for?

18 A. It -- yeah. It says that the category selection
19 for Salem Public Library was updated, but it doesn't show
20 what the updates are.

21 Q. Okay. And is there a way we can figure out what
22 those updates were?

23 A. No.

24 Q. Okay. Nichols, is that the employee of MOREnet?

25 A. Craig Nichols.

1 Q. Craig Nichols, okay. Could he have uploaded it
2 for Salem if they couldn't do it themselves? I mean,
3 could they have sent Mr. Nichols --

4 A. Yes, that's possible.

5 Q. Would he have a record of this? I mean, if we
6 subpoenaed him, would he be able to tell us or --

7 A. No. Everything he had I have.

8 Q. Okay. But is that what we're looking for, the
9 category selection?

10 A. Yes, that something was changed with the
11 categories.

12 Q. Okay. And that's what was described in
13 Exhibit 6?

14 A. Yes.

15 Q. Okay. We sort of touched on it in the previous
16 topic, which had to do with the defaults. We sort of went
17 beyond that a little bit. In terms of categories and
18 websites blocked by Salem Public Library, there was the
19 February 10 e-mail that we discussed --

20 A. Yes.

21 Q. -- with Mr. Nichols and Miss Wofford or
22 Miss Brown at the time?

23 A. Yes.

24 Q. Where he alerts her to, you know, you might --
25 you have more subjects than -- or more topics blocked than

1 we normally block?

2 A. Yes.

3 Q. Would you like me to make that change?

4 A. Yes.

5 Q. Let's look on that date. Let's look on -- the
6 e-mail was Exhibit -- I want to say it's Exhibit 7.

7 Excuse me, Exhibit 8. That's February 20 --

8 A. 25.

9 Q. So let's look at that.

10 A. Okay.

11 Q. Okay. And if you turn the page to the morning
12 of February 26.

13 A. Yes.

14 Q. Okay. And is that Mr. Nichols?

15 A. Yes.

16 Q. That's his user ID?

17 A. Yes.

18 Q. So he did something at 8:01 in the morning?

19 A. Yes.

20 Q. And what did he do?

21 A. He updated the category selection for the Salem
22 Public Library.

23 Q. So he -- he seemed to respond to Miss Brown's
24 request to, in fact, change it?

25 A. Yes.

1 **Q. Okay. Can you look back at Exhibit 8 again?**
2 **And is there anything in that e-mail after that -- I think**
3 **if you move up, up on the page -- where they talk about**
4 **that happening?**

5 A. Yeah.

6 **Q. And what does he say?**

7 A. He says, "I changed the categories. I don't see
8 an allow entry yet. Let me know if you need me to get on
9 in there. The new categories probably took care of most
10 of your requests."

11 **Q. What is an allow? What is he talking about**
12 **there, do you know?**

13 A. Yes. The organizations can set their own allow
14 list. That means they can specify a web page to allow
15 past the filtering.

16 **Q. Okay. Why would he expect to see that allow**
17 **list?**

18 A. It looks like she was trying to allow certain
19 URLs.

20 **Q. Okay. All right. So this updated category**
21 **selection list, if we look through this whole sheet and**
22 **find category changes, that is where things become blocked**
23 **and unblocked?**

24 A. That is where the category selections change.

25 **Q. Okay. But there's not a way in looking at this**

1 sheet to know whether or not they were added or not
2 allowed?

3 A. Correct.

4 Q. Or added or removed?

5 A. Right.

6 Q. And again, I just want to make sure, is there
7 any way that you know we could figure out what happened on
8 that day other than that a category change happened?

9 A. No.

10 Q. Again, Nichols wouldn't know or --

11 A. Back that far --

12 Q. I mean, I guess his memory --

13 A. Yeah. If he pulled up his memory, but I
14 seriously doubt it.

15 Q. But not any documentation that MOREnet would
16 have?

17 A. Unless it's in the tickets for that time.

18 Q. Okay. So this topic four talked about
19 categories and websites, so is there anything else that I
20 would need -- that would be a way to know whether or not
21 categories were changed by Salem, other than looking at
22 this account change log?

23 A. Yeah. You could look at the account change log
24 for -- 3206 is the user name that indicates categories
25 were changed.

1 Q. Okay. Let's talk about websites now, the second
2 part of that question. How does one either block
3 additional websites or unblock additional websites?

4 A. They would log into the web-based administrator
5 module we've been referring to as web admin.

6 Q. Okay.

7 A. And then they would navigate to the local allow
8 block section and then add specific websites to either the
9 allow list or the block list.

10 Q. Okay. So you call this -- they go to the web
11 admin --

12 A. It's a web-based interface, administrative
13 interface.

14 Q. Okay. And are they logging in? Would --
15 Miss Wofford or Miss Brown would log in as 3206 on this
16 internet?

17 A. Somebody would log in as 3206.

18 Q. Okay. They can then make changes by adding
19 websites to block?

20 A. Yes.

21 Q. Or preventing something from being blocked?

22 A. Yes.

23 Q. Can they prevent something from being blocked
24 that is part of a category that's blocked? I mean, this
25 is going in and saying even though this is blocked by a

1 category, I want to allow it?

2 A. That's the allow list.

3 Q. That's the allow list. Okay. And is the other
4 thing called a block list?

5 A. Yeah.

6 Q. It's called a block list, okay. And any time
7 that that happened, Salem did that, what you just
8 described there, it would show up on this, this
9 spreadsheet that we're now looking at, which is the
10 Internet Content Filtering account change log that you've
11 produced today?

12 A. It -- yes. It looks like they would set --
13 there are two ways that they can allow a website. One is
14 on a temporary basis and one is on a permanent basis.

15 Q. Okay. I want to get -- I think one of the
16 subjects is the process that they do that, but I just want
17 to know about documentation. I want to be able to know
18 that -- you know, the subject has to do with categories
19 that are blocked and you've described to me about how I
20 would have learned that. It will say category changed?

21 A. Yes.

22 Q. Or it would say updated category selection?

23 A. Right.

24 Q. There's not a way to figure out if it was
25 blocked or unblocked, but I would get to see that

1 something happened?

2 A. To the categories.

3 Q. To the categories. Now I'm just talking about
4 blocking or unblocking of specific sites. So you're
5 telling me the user, in this case Salem, would get on and
6 they would log on as 3206 and they could make changes on
7 their web admin interface?

8 A. Yes.

9 Q. And they could allow or not allow -- and we'll
10 get into how they do that -- either permanent or
11 temporarily, but it would log on this spreadsheet that
12 we're talking about?

13 A. I know the temporary ones will log on there. I
14 don't know if the permanent ones will log on there.

15 Q. Okay. And how would I learn if the permanent
16 ones -- how the permanent ones were tracked?

17 A. Tracked, I don't know. If it's not on here, I
18 don't know how you would learn that.

19 Q. Well, maybe if we go to the first page. I'm
20 looking at the first page, the August -- excuse me,
21 starting on April 30, 2009. For example, the very bottom
22 one, it says, "Disabled filtering for URL."

23 A. Yeah.

24 Q. It doesn't appear to have a time on it?

25 A. It looks like it got cut off.

1 Q. Oh, I see. Would it not run to the next --
2 well, maybe not. I'm trying to see if you can identify
3 something that would determine whether it was something
4 more than temporary, if it was a permanent change.

5 A. On 5/11/2009, 14:17.

6 Q. Okay.

7 A. There says, "URL list added, Missouri Lottery,
8 to deny page allow URL list."

9 Q. Okay. So what does -- what is "Deny page allow
10 URL list"?

11 A. I believe it is adding them to the allow list
12 that we've been talking about.

13 Q. How -- I'm really looking for a definitive.

14 A. Okay.

15 Q. Can we get -- how can we get a definitive
16 answer? Because that would seem critical to us. Because
17 I see the word deny and allow in the same sentence, so
18 I'm --

19 A. Yeah. It's kind of a misnomer. The deny page
20 comes up and then they have to allow it, so it bypasses
21 the deny page is what it's saying.

22 Q. So deny page, allow URL list?

23 A. Yes. So basically they're allowing the URL past
24 the denial, if you can kind of understand that.

25 Q. Okay. Let's go to -- because lottery, I can see

1 maybe they would say -- let's go down to three, four more,
2 the 5:45 -- excuse me, 15:45 entry. It's the Salem News
3 Online?

4 A. Yes.

5 Q. So it's a news source?

6 A. Yes.

7 Q. So somehow, I presume, it was blocked and they
8 have decided to allow it. So deny page allow URL list
9 means thesaalemnews.com will forever be able to be
10 read in the Salem Public Library; is that correct?

11 A. It could be read at this time.

12 Q. Right. They would have to come back and block
13 it again, right, because you don't see anything temporary
14 on this?

15 A. Right. They would have to remove the allow.

16 Q. Okay. Okay. So at 15:46 somebody logging on
17 would be able to read it?

18 A. Yes.

19 Q. And so I would have to go through this after
20 this point and see if the Salem News Online came up again
21 and they decided to block it?

22 A. Yes.

23 Q. Can you give me -- so -- can you give me an
24 example of words where they're actually blocking an
25 additional site so I know what I'm looking for instead of

1 deny page allow URL list? Is there a -- can you look at
2 this and find a blocked -- an additional blocked page?

3 A. I am not aware of any page they actually
4 blocked, so I don't know that they would show up here.

5 Q. Sorry.

6 A. I would look for the word blocked or denied.

7 MR. DOTY: It's 12 noon. Do you want to take a
8 break and then maybe we can -- I'll look through this and
9 I don't know what -- just go off the record.

10 (Lunch break taken)

11 (Plaintiff's Exhibit No. 9 marked for
12 identification.)

13 Q. (By Mr. Doty) We're back on the record after a
14 short lunch break. We're still on topic number four,
15 which is, "Categories and websites blocked by Salem Public
16 Library from 2007 to the present." I've handed you what
17 we've marked as Exhibit 9.

18 A. Yes.

19 Q. Okay. Let me -- let me tell you what that is.
20 It's -- is this the Account Change Log?

21 A. Yes.

22 Q. Okay. It's an account change log. This is what
23 the Salem Public Library produced to us earlier on in
24 discovery, so I don't know that it's the exact same pages
25 that you produced for us. I mean -- but it's something

1 that we want to get on the record and then we can talk
2 about specific pages in this exhibit.

3 A. Okay.

4 Q. Fair enough?

5 A. Yes.

6 Q. So I want to summarize what I -- in the form of
7 a question so that we can, you know, get an answer in
8 this. On the issue of categories, if we look at that
9 Exhibit 9 that I just handed you and that very first page,
10 so look on the date of, say, May 8 of 2009 --

11 A. Yes.

12 Q. -- where Mr. Nichols has made a change and it
13 says, "Policy: Updated category selection for policy in
14 group," and then, "3206," correct?

15 A. Yes.

16 Q. Okay. So that is where those defaulted
17 categories plus any additional categories that Salem
18 requested MOREnet to add would be placed in the system?

19 A. We could have added or removed categories. All
20 it indicates is that it was changed.

21 Q. A change happened, okay. What I see -- now,
22 notice on the Type it says "policy"?

23 A. Yes.

24 Q. On the column Type it says "policy". And
25 throughout most of this chart, most of the categories are,

1 in fact, "default". What's the difference between a
2 policy and a default?

3 A. I'm not really sure. I don't know.

4 Q. And how could we find out?

5 A. I would have to probably ask the vendor.

6 Q. Okay. So this is a Net -- is this a Netscape --
7 excuse me, I'm sorry, Netsweeper?

8 A. This is Netsweeper terminology.

9 Q. Okay. And this is a Netsweeper spreadsheet
10 that's produced because of their software?

11 A. It is a report that we took the information out
12 of and put into a spreadsheet.

13 Q. Okay. Okay. If -- could Salem make the same
14 updated category selection policy using their user name?

15 A. Yes.

16 Q. They have that same power?

17 A. Yes.

18 Q. Okay. It would -- we would just look for the
19 user name and try to find references to them doing that --

20 A. Yes.

21 Q. -- throughout this document? Okay. And your
22 testimony is that there's no way of knowing whether or not
23 there was a change and add or delete, just that a change
24 was made?

25 A. Correct.

1 Q. And there's no way that you're aware that you
2 can figure out what particular change was made?

3 A. I'm not aware. It might be in ticket notes.

4 Q. Okay. Okay. The second issue which now goes to
5 specific websites, if you can turn to page three of that
6 Exhibit 9, and we talked about a few entries that happened
7 there on May 11 of 2009, and starting with the "URL list".
8 And so your testimony is that the "Deny page allow URL
9 list" that happened at 3:45 regarding the Salem News
10 Online would be to allow the Salem News Online to clear
11 any filter?

12 A. Yes.

13 Q. All right. And that's listed again as a
14 default, but you're not sure what that means?

15 A. I'm not sure what that means.

16 Q. Can we go to page four? On the -- go down to,
17 say, May 14, 2009 at 6 P.M., 18:00.

18 A. Okay.

19 Q. And there's the disabled, the filtering for URL
20 and it lists the URL, smallworldvacations.com?

21 A. Yes.

22 Q. And then it says until and it gives a time. And
23 then in parentheses is 3600 seconds?

24 A. Yes.

25 Q. An hour, so that's a one-hour --

1 A. Yes.

2 Q. And so this is a -- is this a temporary?

3 A. Yes.

4 Q. A temporary one. And at the end of that, at
5 nine o'clock -- I mean, excuse me at 17 -- at 19:00, which
6 is 7 P.M., that filter to Small World Vacations would come
7 back on again?

8 A. Right.

9 Q. And a user would not be able to access that?

10 A. Right.

11 Q. Is there a default time that -- when they'd log
12 on and it says disable that website for that particular
13 website, is one hour the default time?

14 A. I don't know if there's a default. They can
15 choose the time.

16 Q. Okay. And what are the -- is it a typed-in
17 choice or is it a clicked choice?

18 A. I believe it's a typed-in choice.

19 Q. Okay. And so on this page, for example, in the
20 one above that, the davita.com, it says it was 1800
21 seconds, that one was a half hour?

22 A. Yes.

23 Q. And again, that's a choice that the user, in
24 this case, 3206 is making to let someone access Davita for
25 a half hour?

1 A. Yes.

2 Q. Are you certain? Because I would ask how I
3 would find out if you're not certain. Are you certain
4 that it's not a -- there's not a default, it is a choice
5 that the individual is going to have to make?

6 A. I'm not sure that there is a default.

7 Q. Okay.

8 A. I don't know.

9 Q. You're not sure. And how would we find out?

10 A. I'd have to go into the program and look.

11 Q. And you have that capability at your desk. I
12 mean, do you have this ability to do this?

13 A. Yes.

14 Q. Do you have the ability in your desk or a desk
15 at MOREnet to make a change to Salem library's choice by
16 just logging in as a user and making that change?

17 A. Yes, I can. I'd like to clarify something.

18 Q. Sure.

19 A. On that page that we're on, 5-14-2009.

20 Q. Yes.

21 A. 8:31. It says, "Disabled filtering for Category
22 New URL." You were looking for an example. New URL is a
23 category.

24 Q. Okay. Was that one of the default categories?

25 A. In March 2009, it may have been. It's not now.

1 Q. If you look at Exhibit 6. Yeah. Okay. Do you
2 see Exhibit 6?

3 A. Yes.

4 Q. Okay. So I'm looking at that list of 28 and New
5 URL is listed?

6 A. Yes, it is.

7 Q. Okay. Do you know what that means, New URL, or
8 what did it mean?

9 A. It means that when a user goes to a site that
10 hasn't been categorized yet, it gets put into this
11 category until the vendor can categorize it.

12 Q. And so blocked prior to that point, prior to the
13 time that they can categorize it?

14 A. If New URL is selected as a category, then it's
15 blocked. If it's not, then it's allowed.

16 Q. Okay. So in -- I'm going back now to Exhibit 9,
17 so this was in May of 2009?

18 A. Yes.

19 Q. It would have been blocked. So -- this is good.
20 So they've disabled it, but they've disabled it for a
21 period of time?

22 A. Yes.

23 Q. In this case an hour?

24 A. Correct.

25 Q. Do you know what the maximum time they could

1 **disable it for?**

2 A. An hour.

3 **Q. It is. So -- do you know what the least amount**
4 **of time you can disable it for is?**

5 A. A minute.

6 **Q. A minute. So 60 seconds. Okay. All right.**
7 **And since the time we've been sitting here and prior to**
8 **this, you weren't able to find any time that they blocked**
9 **any sites like they unblocked the Salem news?**

10 A. I haven't found any instances of them blocking a
11 site.

12 **Q. Okay. You had earlier said that like the**
13 **language on page three where it talked about, "URL list:**
14 **Added URL" --**

15 A. Yes.

16 **Q. -- "to deny page allow URL list" --**

17 A. Yes.

18 **Q. -- you would expect to see something around the**
19 **lines of "deny page block URL" or some form of not allow?**

20 A. I would assume so.

21 **Q. Okay. Nothing shout out at you in this to show**
22 **that they have, in fact, done that?**

23 A. No, it didn't.

24 **Q. We're to come back to this chart on our sixth**
25 **subject, which is how they actually do that.**

1 A. Okay.

2 Q. But I don't have any other questions on this
3 subject area four.

4 A. Okay.

5 Q. So number five is -- again, I'm going back to
6 Exhibit 1, Enclosure 1, and I'm going to read the topic --
7 "Descriptions of the internet category descriptions for
8 web categories which subscriber libraries such as Salem
9 Public Library can block and whether those descriptions
10 have changed from 2007 to the present." Are you
11 designated to speak on that --

12 A. Yes.

13 Q. -- testify on that? And are you prepared to do
14 that?

15 A. Yes.

16 Q. Okay. And did you bring any documents on that
17 subject?

18 A. Descriptions, I'm not sure. No descriptions, no
19 documentation of the descriptions.

20 Q. Okay. So what can you testify as to those
21 descriptions of those categories that are blocked?

22 A. Netsweeper provides descriptions for each of the
23 categories and they publish those. The descriptions and
24 the categories may change periodically throughout the
25 year. They don't always tell us when the descriptions

1 change. The one change that I am aware of was done
2 recently this year. They changed the description for
3 alternative lifestyles category.

4 **Q. Okay.**

5 A. And they moved that category to an information
6 section to make it more clear that it's informational type
7 of websites as opposed to objectionable type of websites.

8 **Q. This was the result -- do you know why they made**
9 **the change?**

10 A. It was a result of ACLU lawsuits and they worked
11 with the ACLU to modify their descriptions and the way
12 they presented.

13 **Q. Earlier when we were talking about the**
14 **categories, one of them I had mentioned was the occult?**

15 A. Yes.

16 **Q. Do you know what that occult category blocks?**

17 A. I do not.

18 **Q. Okay. Do you know how we would find out? You**
19 **said they publish it?**

20 A. Yes. I'd go back to the vendor's documentation
21 and --

22 **Q. Do they provide that documentation to you?**

23 A. I can get it.

24 **Q. Okay. All right.**

25 MR. DOTY: One of my concerns is I think it

1 falls under one of the categories of documents we were
2 asking for in terms of the categories. I mean, can we get
3 that? Is that something you guys can produce without
4 resubpoenaing it?

5 MS. MARKIE: I don't understand what it is that
6 you're asking for because she was saying that it was
7 something that the vendor had. She could get it, but that
8 doesn't mean that she had it.

9 MR. DOTY: Oh, I thought --

10 MS. MARKIE: I mean, it could be on a vendor's
11 website. I mean --

12 MR. DOTY: I thought --

13 **Q. (By Mr. Doty) Is this something that you have in**
14 **your office that you can get? I mean, the vendor's**
15 **provided it to you previously?**

16 A. I would have to go get a current list because it
17 changes periodically and I would have to get a current
18 list. I don't know what that is.

19 **Q. I mean, do you keep track over the years? I**
20 **mean, let me see. I mean, we're interested in from 2007**
21 **to the present.**

22 A. I wouldn't know what kind of changes the vendor
23 made during that time.

24 **Q. Okay. So MOREnet -- does MOREnet have a copy of**
25 **what the categories were in 2007 and what they were**

1 **defined as?**

2 A. In 2007, no. We don't have anything before
3 2009.

4 **Q. Okay. But do you have this, categories for**
5 **2009?**

6 A. I have -- I can get some documentation, but I --
7 MS. MARKIE: Can you get it from MOREnet sources
8 or are you going to the vendor?

9 THE WITNESS: I'd have to go to the vendor.

10 MS. MARKIE: So it's something that the vendor
11 would have rather than MOREnet.

12 MR. DOTY: Okay.

13 **Q. (By Mr. Doty) You do not -- so you do not keep**
14 **track -- you do not keep the vendor -- that's not part of**
15 **your document retention?**

16 A. We don't have a document retention. It may be
17 on the document list that I provided on the manuals and
18 user guides and training guides and all that stuff.

19 **Q. Okay. And is that on the DVD?**

20 A. That's on the CD in the very back.

21 **Q. The CD, all right. Before we -- I'll check that**
22 **out.**

23 MS. MARKIE: And I'm just trying to clarify,
24 there are some things, as I understood the testimony, that
25 may be accessible to MOREnet, but that MOREnet doesn't

1 have control over because it's with the vendor.

2 MR. DOTY: Right.

3 MS. MARKIE: And I was just trying to clarify,
4 you know, we can't -- I don't think that we should be
5 expected to produce something that the vendor has that we
6 can obtain from the vendor, but we don't have.

7 MR. DOTY: No, I understand that.

8 Q. (By Mr. Doty) I just want to make sure that -- I
9 mean, you produced a CD that has some documentation and
10 manuals and so the definitions may well be in that?

11 A. They may be.

12 Q. Okay. And I can obviously -- we can open that
13 up and see that. If it's not in that, is there anything
14 else that MOREnet would have that would track these
15 changes over time? Do you get a newsletter from Netscape
16 (sic) that has the descriptions on it?

17 A. No. There's no newsletter. They do release
18 notes on every new release that they have. What they
19 include in their release notes, I don't know, I --

20 Q. Go ahead.

21 A. I'd have to ask them. I'd have to ask them for
22 the release notes.

23 Q. So that recent change that you talked about
24 regarding alternative lifestyles, how did MOREnet learn
25 about that?

1 A. I spoke with our Netsweeper representative and
2 they came down for a visit not too long ago and so we were
3 talking about it, so he sent me their release, their
4 announcement on the change.

5 **Q. And this release, is it software or is it a**
6 **piece of paper or a book?**

7 A. I think it's like a news release.

8 **Q. Okay. Okay. And how long, based on your**
9 **document retention policy, would you keep that news**
10 **release that they provided you regarding that recent**
11 **change to alternative lifestyles?**

12 A. I wouldn't refer to the document retention
13 policy. I would keep it for three years, probably.

14 **Q. And so in the past three years, have there been**
15 **anything -- any other news releases, as you've described**
16 **them, discussing category changes?**

17 A. Not that I'm aware of.

18 **Q. Where would you look to find that?**

19 A. I would go to the vendor, to Netsweeper.

20 **Q. No, I'm talking about ones that you've got --**
21 **you received from them and then are retaining.**

22 A. Oh, I haven't received any others from them.

23 **Q. In the last three years?**

24 A. Right.

25 **Q. Okay. On this descriptions of the internet**

1 category descriptions, do you ever make recommendations or
2 comments to Netsweeper about those categories, the
3 definitions?

4 A. I think we had a conversation about the
5 alternative lifestyles and new URL.

6 Q. Okay. Do you know when the new URL discussion
7 was?

8 A. It might have been when we first started with
9 Netsweeper because it was causing a lot of problems.

10 Q. But between -- other than those two, are there
11 any others that you recall?

12 A. Not that I recall.

13 Q. Okay. And do you know if they ended up changing
14 New URL?

15 A. No. They just clarified what it meant and what
16 we -- what we could or could not do.

17 Q. All right. I don't have any other questions on
18 five. Let's go to six, again, reading off of Exhibit 1,
19 Enclosure 1.

20 A. Okay.

21 Q. "How Salem Library administrators can make
22 changes to their Internet Content Filtering including, but
23 not limited to, disabled filtering for URL, allowing
24 websites to be unfiltered for specified periods of time
25 and deny page allow URL list as reflected in the Salem

1 **Public Library Internet Content Filtering Account Change**
2 **Log," which for this deposition we've marked as Exhibit 9.**

3 A. Okay.

4 **Q. Fair enough?**

5 A. Uh-huh.

6 **Q. And are you designated to testify on that?**

7 A. Yes, I am.

8 **Q. And prepared to do so?**

9 A. Yes, I am.

10 **Q. In addition to the document you've provided us**
11 **in the notebook, which is the Account Change Log, are**
12 **there any other documents that you've produced that are**
13 **responsive to the document request, which is Enclosure 2,**
14 **paragraph five? Excuse me, no, no, no, paragraph six.**

15 A. Yeah. The documents included in paragraph six
16 include any of the instruction manuals or training guides
17 that we had to make available.

18 **Q. And those are on the CD?**

19 A. They are on the CD in the back. Regarding your
20 question about is there anything additional, there is an
21 e-mail in the communications section from Craig Nichols to
22 Glenda that gives some screen shots on how to make some
23 changes.

24 **Q. Okay. All right. Can you find that for me?**

25 **It's on tab five, did you say?**

1 A. Yes. So it's the same e-mail thread that you
2 provided in one of the other exhibits. It's just an
3 extension of it. So it's dated February 25, 2010 and
4 February 26, 2010.

5 **Q. All right.**

6 A. They should be in date order. It's about
7 halfway through the e-mail section.

8 **Q. Which tab is this? I'm sorry.**

9 A. It's three, communication.

10 **Q. And you say it's halfway through?**

11 A. That section is divided up into different kinds
12 of communications, so if you go -- just flip back to where
13 you start seeing e-mails.

14 **Q. Okay. I'm there.**

15 A. And then about halfway through that, maybe a
16 little -- two-thirds of the way through. So you're
17 looking for an e-mail dated February 26 from Craig
18 Nichols.

19 **Q. At 9:06 in the morning?**

20 A. The one I'm looking at is dated 9:06 in the
21 morning.

22 **Q. Okay. Let's -- before I mark this, we're**
23 **looking at the same e-mail. Those screen shots, is that**
24 **of this web-based system where the user would make changes**
25 **by blocking and unblocking?**

1 A. Yes. This is the -- this is what the web
2 interface looks like.

3 Q. Okay. Well, I'm going to mark it so that we
4 have it in the record.

5 A. And there are several pages.
6 (Plaintiff's Exhibit No. 10 marked for
7 identification.)

8 Q. (By Mr. Doty) So what I'm marking is the three
9 pages. This is what you've -- this is what you've
10 produced to us today, correct?

11 A. Yes.

12 Q. Okay. Can I look at it back and then -- okay.
13 Let's talk about the methods by which I, a library user,
14 come in and try to access a website and it's blocked.

15 A. Okay.

16 Q. And I come to the librarian to try to get it
17 unblocked.

18 A. Uh-huh.

19 Q. How does it -- what are the methods that I -- it
20 might be unblocked by the librarian when I go to them?

21 A. When you go to a website that's blocked, a
22 message comes up and says this website is being blocked
23 for this reason and then there's a link to request that it
24 be unblocked and the librarian can go in and unblock it
25 for that specific amount of time. That's the temporary

1 way.

2 Q. Okay.

3 A. And then the permanent way is to log into this
4 web administrator interface and go in and add it to the
5 specific allow list so that it's permanently unblocked.

6 Q. Okay.

7 (Plaintiff's Exhibit No. 11 marked for
8 identification.)

9 Q. (By Mr. Doty) I'm going to hand you what is
10 marked Exhibit 11. Do you recognize this?

11 A. That looks like one of the deny screens that you
12 get.

13 Q. So this is what you were saying. So I go to a
14 website and I try to access it, this is what I, as the
15 user, would see in the library, the library patron?

16 A. Yes, I think so.

17 Q. Okay. In the bottom left there it says,
18 "Netsweeper, powered by Netsweeper"?

19 A. Yes.

20 Q. Okay. And so now what do I do? Do I click
21 disable filtering if I -- I'm a user and I say I want to
22 disable this, I want to get to this Great Dreams Native
23 American website? I'm just looking at the first deny.

24 A. Okay.

25 Q. This is just -- I think just a -- well, it's

1 pages of documents that were blocked. So she gets to this
2 Great Dreams website and she said, oh, I want to see it,
3 so she then, what, clicks disable?

4 A. Yeah. Those links go to different things and
5 honestly, I'm not sure if that would disable the filtering
6 or if the librarian has to go in and do it themselves.

7 Q. You talked earlier about the librarian getting
8 an e-mail?

9 A. The librarian is notified either by the patron
10 or they can get some kind of -- like some people will put
11 a link there saying request that this be unblocked and
12 then they get a notification. It just kind of depends on
13 how they have it set up.

14 Q. Okay. How do -- so my question -- my question,
15 when I click "disable filtering", you don't know what
16 happens?

17 A. I don't know how this one is set up.

18 Q. How would we find out?

19 A. I'd probably have to look at the configuration
20 for the library.

21 Q. And could you do that at your desk?

22 A. I think so.

23 Q. Okay. So you don't know what "modify settings"
24 is if the user -- the patron, library patron clicks
25 "modify settings", what they're going to be allowed to do?

1 A. I don't know.

2 Q. Or "enable filtering", do you know what that one
3 means, the third?

4 A. I don't know if the patron is going to be
5 allowed to do these things on their own or if it requires
6 something for the librarian to do.

7 Q. Okay. Could the -- do you know, is there
8 multiple choices that a vendor -- not a vendor, a customer
9 of yours could choose? Could they choose for a library
10 patron to do their own disabling?

11 A. They have the ability to customize this page.
12 They can have links going to different things. They can
13 change the wording on it. They can do some kind of
14 customizations on it.

15 Q. To include allowing them access immediately
16 without seeing anybody?

17 A. I'm not sure.

18 Q. You're not sure. The bottom says, "Contact your
19 internet administrator if you require access to this
20 site."

21 A. Yes.

22 Q. You don't know what that means in this case? I
23 mean, are they supposed to contact -- internet
24 administrator, would that be the MOREnet folks?

25 A. No, that would be the librarian.

1 **Q. Okay.**

2 MS. MARKIE: Just to clarify, this document is
3 not a MOREnet document; is that right?

4 THE WITNESS: That's a MOREnet server. It's
5 produced off of the MOREnet server, but, yeah, the -- the
6 contextual part is Netsweeper's.

7 **Q. (By Mr. Doty) I'm sorry, the contextual part is
8 what?**

9 A. How the page is presented, the mechanism for
10 presenting the deny page, that's the function of the
11 software. The -- hoover.spg.more.net at the bottom,
12 that's the name of the server that they're hitting to get
13 that deny page. That's our server. So they hit our
14 server, then because of the way the library is configured,
15 they'll get the deny page, for example. But it's all --
16 how all that works is a function of the software.

17 **Q. And whose software is that, is that --**

18 A. Netsweeper's software.

19 **Q. Okay. And who configures that, MOREnet or does
20 the library configure that?**

21 A. MOREnet has some default settings, but the
22 library is given the ability to do a lot of customizations
23 on their own.

24 (Plaintiff's Exhibit No. 12 marked for
25 identification.)

1 **Q. (By Mr. Doty) I'm handing you what's marked as**
2 **Exhibit 12. Do you recognize that document?**

3 A. It looks like an e-mail from Eric Jansing to
4 Glenda Brown.

5 **Q. Okay. That website there, that**
6 **enable.more.net --**

7 A. Yes.

8 **Q. -- is that different than the tigers.more.net?**

9 A. It is. It's a web page that we set up so that
10 they could enable certain websites. That page doesn't
11 exist anymore, so I'm not sure how it was configured.

12 **Q. This is the -- which one, tigers or enable?**

13 A. Enable.more.net.

14 **Q. Okay.**

15 MR. HARPOOL: Did you -- was that Exhibit 12?

16 MR. DOTY: Yes.

17 MR. HARPOOL: And have you done Exhibit 10?

18 MR. DOTY: Yes. 10 --

19 MR. HARPOOL: What was 10?

20 MR. DOTY: 10 was actually part of the notebook
21 in the middle of Exhibit 3. We actually just took it out
22 of her book so that it would be --

23 MR. HARPOOL: Just remind me before we leave to
24 get a copy of that.

25 MR. DOTY: I'll get a copy of that.

1 MR. HARPOOL: That's fine.

2 (Plaintiff's Exhibit No. 13 marked for
3 identification.)

4 Q. (By Mr. Doty) I handed you the wrong one. Sorry.
5 I've handed you what's exhibit -- marked as Exhibit 13.
6 Do you recognize it?

7 A. It looks like an e-mail from Glenda to another
8 user.

9 Q. Okay. And what does it say?

10 A. It said the website is being blocked because of
11 pornography and it cannot be allowed.

12 Q. Okay. When I was going through the process by
13 which a library patron tries to access a website, you
14 mentioned an e-mail that would go to the librarian. Is
15 this the type of e-mail that would go to the librarian,
16 the original message from --

17 A. Yes.

18 Q. And who -- where does -- it has a name down
19 there, barclayanna@ymail?

20 A. Yes.

21 Q. But is that standard language where it starts
22 there, "An unknown user at," and then it lists an ISP?

23 A. That's an IP address, so an unknown user at that
24 IP address is wanting access to that website.

25 Q. Okay. Is that a Netsweeper-produced e-mail?

1 A. That would be like a default e-mail that comes
2 out of Netsweeper indicating that someone is requesting
3 access.

4 **Q. Now, that barclayanna e-mail address, is that**
5 **something that the Netsweeper would have prompted the**
6 **library patron to insert so that they would get**
7 **notification from the library of the decision of the**
8 **librarian?**

9 A. I don't think so. I -- it looks like the part
10 down below is a copy of the e-mail that was originally
11 sent, so it looks to me like barclayanna is replying to
12 the e-mail sending it to Glenda Brown and Glenda is
13 responding to the request to unblock.

14 **Q. Oh, okay. So that -- that language there, the**
15 **"unknown user at" --**

16 A. Yes.

17 **Q. -- would be sent to barclayanna?**

18 A. It would probably be sent to Glenda Brown.

19 **Q. And she's saying -- who is she replying to?**

20 A. Who is Glenda replying to?

21 **Q. So Glenda writes, "The website is blocked**
22 **because of pornography. It cannot be allowed."**

23 A. Right.

24 **Q. So who is she e-mailing that to?**

25 A. Barclayanna.

1 Q. That's not a -- is that not a MOREnet person
2 or --

3 A. No. I would guess it's a patron.

4 Q. How does she know to e-mail to barclayanna this
5 e-mail regarding why she can't access this site or he?

6 MR. HARPOOL: Objection, calls for speculation.

7 Q. (By Mr. Doty) Well, I'm just -- my question is I
8 don't understand how Miss Brown would have gotten this
9 notice that an unknown user tried to access it and then
10 who would -- how would she know to e-mail? Is that
11 something that MOREnet produces for her?

12 A. MOREnet doesn't produce anything. The software
13 from Netsweeper would produce it and send it to her. Like
14 on that deny page that we were looking at earlier --

15 Q. Yes, yeah, which is --

16 A. -- one of the links might send this e-mail to
17 Glenda Brown, who is the administrator, and that's the
18 kind of language it would use down at the bottom there.
19 So then it looks like barclayanna sent that to Glenda
20 Brown again and then Glenda responded back to barclayanna.

21 Q. Why would barclayanna get a copy of this e-mail?

22 A. I'm not sure.

23 Q. Is Netsweeper in -- when I get to that blocked
24 page, does it offer me an option to put in my e-mail
25 address to challenge being blocked?

1 A. Part of the configuration could allow that.

2 Q. Okay. But you're not certain?

3 A. I'm not sure how this was set up.

4 Q. So I'm a user, a patron of the library, and I'm
5 blocked. I go to Glenda, either -- the librarian or
6 whoever is the -- whoever is the internet administrator as
7 specified on the screen and I say I'd really like to
8 access the Salem News Online?

9 A. Right.

10 Q. What happens next? What is that network -- what
11 does that administrator do?

12 A. They log into the web administrator interface.

13 Q. Is that Exhibit 10, which is the e-mail that
14 Craig Nichols sent Glenda the screen shots?

15 A. Yes.

16 Q. Okay. So they log into that.

17 A. They log into that and they navigate to that
18 section to allow the URL. It would be allowing the
19 local -- what we call the local, meaning only that
20 library, and put in the URL for the website to allow it
21 permanently.

22 Q. To allow it permanently?

23 A. Yes.

24 Q. What if they just want to allow it for an hour?

25 A. Then they can do what they call a temporary

1 override and that prompts them to specify how long they
2 want it to be open.

3 **Q. Is that on this same program that I'm looking at**
4 **for Exhibit 10?**

5 A. Yes. All of it is included in the web
6 administrator.

7 **Q. I'm going to walk through each one, either**
8 **permanent or temporary, but this will unlock it for all of**
9 **the computers at the Salem library that are under that**
10 **account?**

11 A. Yes.

12 **Q. There's not -- is there individual unlocking on**
13 **a specific computer?**

14 A. You can do it, you can configure it by different
15 groups. Like a library might have an adult section and a
16 kids section, so she could indicate that I only want to --
17 I only want to allow this URL for the adult section, but
18 not the kid section.

19 **Q. Does Salem -- are you aware of Salem having an**
20 **adult section and a children's section in terms of your**
21 **subscription at MOREnet?**

22 A. I've not seen any kind of configuration that
23 shows they break it out by group.

24 **Q. Okay. But it's something they could do if they**
25 **chose to?**

1 A. They could.

2 Q. Okay. What if they didn't want to do this for
3 some reason? Maybe the internet person is not there. Is
4 there a MOREnet help desk they could call up and say I
5 have this person who needs to do it, can you do it
6 remotely?

7 A. Who's calling the help desk?

8 Q. Say a librarian who doesn't have the skills to
9 do the internet.

10 A. In the past we would make the change for them if
11 they requested it. Now it requires a written
12 confirmation.

13 Q. Do you know when that changed?

14 A. July 2011.

15 Q. Okay. So prior to July 2011, it's possible that
16 a librarian could call MOREnet and have them make the
17 change?

18 A. Yes.

19 Q. But it would also show up on the internet change
20 log?

21 A. Yes.

22 Q. Okay. But there would be a change to that?

23 A. Yeah.

24 Q. Okay. The screen shot that I'm looking at on

25 Exhibit 10 --

1 A. Yes.

2 Q. -- is this the tigers.more.net web address,
3 that's what I come to when I type that in?

4 A. I don't know if that's what it is now or --
5 because sometimes the server names change. It would be
6 the administrative server, so -- at the time, whatever
7 that was.

8 Q. So on page four of that e-mail, it actually has
9 the number on it, he does specify tigers.more.net?

10 A. Okay.

11 Q. So that would be it?

12 A. That would be it.

13 Q. The librarian would log onto this and this is
14 what they see when they get to the first one. So let's
15 just say the librarian decides, you're right, I'm going to
16 let you see this website. So what does she do when she
17 gets to this page here? It says click --

18 A. Yeah. So it says click on the group name, Salem
19 Public Library.

20 Q. So that's on page one, so takes the mouse and
21 clicks that.

22 A. Uh-huh.

23 Q. Okay.

24 A. And then you click on the word that says default
25 under policies.

1 Q. Okay. I see that word click there.

2 A. And then towards the bottom of that page there
3 will be like a local allow list. There's a drop down that
4 allows you to select local allow or local deny.

5 Q. Okay. Let me -- first let's go where the click
6 is there on the default. They click default?

7 A. Click on the default, uh-huh.

8 Q. What does Category Count 11 mean to the right?

9 A. That's how many categories they have blocked.

10 Q. Okay. And so this is on February 26 at 9:06?

11 A. Uh-huh.

12 Q. And the e-mail was originated at -- so this is
13 after Mr. Nichols had made those category changes?

14 A. I would assume so.

15 Q. Okay. So he's reduced them to half. We now
16 have 11 blocked categories?

17 A. Yes.

18 Q. So she clicks default. Now what's the next
19 thing that they do?

20 A. Now, on the next page it takes you to the --
21 where you can allow or deny specific URLs or websites.

22 Q. Okay. So the SEL that's in this screen shot, I
23 don't know if it's -- maybe it just cut off there, it
24 would be select?

25 A. Select.

1 Q. So they hit the down arrow?

2 A. Yes.

3 Q. And it says, "Local allow URL, slash, keywords"?

4 A. Yes.

5 Q. What are the other options as I click through
6 that, if I hit that arrow?

7 A. Local deny URL.

8 Q. Okay. Any others?

9 A. I think those are the only two.

10 Q. Okay. So I've asked to have a website added or
11 to get access. You say okay, so you're going to hit
12 allow?

13 A. Yes.

14 Q. Do you then put in the -- so you enter the URL?

15 A. Yes.

16 Q. Okay. Am I allowed to do a whole -- I'm not a
17 technical person here. If someone wants to come to
18 MOREnet's website and -- what's your website?

19 A. Www.more.net.

20 Q. More.net. Am I allowed to enter that, what you
21 just said there, and have access to the whole site or can
22 I give someone access to a particular folder or a
23 particular file?

24 A. You can use wild cards to access certain
25 domains, it's called a domain, more.net. It depends on

1 how the domain is set up how it will work. As an example,
2 Google, you can't do that with every website because of
3 the way they have their domain set up. Sometimes you have
4 to enter every single page on the website to allow access
5 to it.

6 **Q. Okay. And how does one know that when one is**
7 **putting this in?**

8 A. Sometimes it's trial and error.

9 **Q. Okay.**

10 A. Sometimes you can tell by the name of the URL,
11 how the domain is set up.

12 **Q. Could a librarian say I'm going to give you**
13 **access to one page only? Could they do that by going all**
14 **the way down to the file name HTML?**

15 A. They could allow the one page, the HTML version
16 of that one page.

17 **Q. And then -- or they could try to go all the way**
18 **to the --**

19 A. To the root using the wild cards.

20 **Q. What's a wild card?**

21 A. It's like a star. It's a replacement for any
22 number of letters.

23 **Q. Okay. So I enter the URL. I want to get the --**
24 **I want access to the Salem News Online?**

25 A. Yep.

1 Q. And she types that in and pushes the slash and
2 wants me to see the whole website.

3 A. Right.

4 Q. Then what do they do?

5 A. Then it gets added to the allow list.

6 Q. Okay.

7 A. They have to save it.

8 Q. Okay. Where's the time? This is a temporary?

9 A. This is a permanent one.

10 Q. This is permanent?

11 A. Yes.

12 Q. Okay. So we did see a few permanent ones on
13 that Exhibit 9?

14 A. Right.

15 Q. The Salem library online -- Salem News Online?

16 A. Uh-huh; right.

17 Q. And we saw that with the Missouri Lottery
18 online?

19 A. Yes.

20 Q. Okay. How does one make a temporary allow?

21 A. There will be a section in here that takes them
22 to -- and I don't remember the name of the section where
23 it is, it might even be under time segments. I honestly
24 don't remember, but it allows them to say allow access to
25 this page for X number of minutes.

1 Q. Is it on the same website?

2 A. It will be -- it will be in the same web
3 administrator interface, I just don't know where. It's --
4 there's a lot of different selections within this website.
5 It's very -- it has a lot of options and it's not always
6 intuitive.

7 Q. Okay. If you look on page two of this, again,
8 Exhibit 10, there's the tabs across, Specify Deny Page,
9 Rename Group, Clone Group, Edit Description, Surf Using
10 Group, Group Restrictions, are any of those ones that
11 would be time limits?

12 A. I'm not sure. Group -- no, group restriction --
13 and you understand that this is Craig's view of the
14 interface, it's not Glenda's view.

15 Q. Okay.

16 A. So he has access to some things that she
17 doesn't.

18 Q. All right. The thing that he's showing her,
19 though, by the click and enter URL are things that she
20 would have, she would have some access to put in a URL
21 entry?

22 A. Right.

23 Q. Bottom of page two says, "Towards the bottom you
24 should see a toggle for local allow, slash, deny URL"?

25 A. Uh-huh.

1 Q. Is the toggle that arrow where he's asking her
2 to select on the next page?

3 A. Yes, that's what it is.

4 Q. Do you know if the manuals that you provided in
5 that CD have screen shots?

6 A. They -- a lot of them do, some of them don't,
7 but they have the instructions on how to do all of this.

8 Q. Would it have the instructions how to do a
9 temporary?

10 A. I believe so.

11 Q. Okay. Including, like, time specifications?

12 A. Yes.

13 (Plaintiff's Exhibit No. 14 marked for
14 identification.)

15 Q. (By Mr. Doty) Okay. I've handed you what's
16 marked as Exhibit 14.

17 A. Yes.

18 Q. Do you recognize that?

19 A. It looks like an e-mail from Rebecca Wall to
20 Glenda letting her know that they have been configured in
21 the Netsweeper.

22 Q. Okay. And Miss Wall has a MOREnet e-mail. Is
23 she at MOREnet?

24 A. Yes, she is.

25 Q. She's still there?

1 A. Yes.

2 Q. If you go to Exhibit 9, which is the account
3 change log.

4 A. Oh, yes.

5 Q. And the very first entries there are April 30.
6 That's Miss Wall?

7 A. Yes.

8 Q. User -- so she did something on the 30th on this
9 account log?

10 A. Yes. She set them up.

11 Q. Okay. And then she sends on that same day, it
12 appears to be, what, 20 minutes after some things she did
13 on the account?

14 A. Yes.

15 Q. She then sends this e-mail to Miss Brown?

16 A. Yes.

17 Q. Or Miss Wofford?

18 A. Uh-huh.

19 Q. Okay. It says in here, "Exceptions can be
20 allowed for all of these categories." Is that the 28
21 categories that were defaulted for her?

22 A. Probably, I think so.

23 Q. Okay. "Your organization is currently
24 configured for a default level of filtering," and then she
25 lists those following categories. Is there a reason to

1 think that Miss Wall would not have done these categories?

2 A. No reason to think she didn't.

3 Q. Okay. And then right after that paragraph it
4 says, "Exceptions can be allowed for all of these
5 categories for any reason. For further information on how
6 to adjust your filter settings, please see the following
7 documents."

8 A. Yes.

9 Q. "Netsweeper instructions and sysop --"

10 A. Sysop. System operator.

11 Q. -- "options." Are those two manuals included in
12 the documents you produced today?

13 A. One of them was an attachment to this e-mail
14 and -- well, I don't see the attachments, but the other
15 one should either be included in the documentation or
16 attached -- there were several attachments to this e-mail.

17 Q. Okay. This is an e-mail -- I mean, it was sent
18 to Miss Brown. Would you have retained an e-mail from
19 2009 at MOREnet?

20 A. Yes. In fact, it may -- I think it's included
21 in the documentation I provided.

22 Q. Okay. And would the attachments have been
23 included as well?

24 A. Yes.

25 Q. Okay. Great. Go down to where they list the

1 user name there.

2 A. Yes.

3 Q. So here's maybe a description. It talks about
4 3206 and then there's a PM?

5 A. Yeah.

6 Q. Does that clarify what the PM stands for?

7 A. It does.

8 Q. Okay. It doesn't clarify it for me, so if you
9 could help me out?

10 A. That's the account they can use to do the
11 temporary, what we call, overrides or the temporary allow
12 for a certain number of minutes.

13 Q. Okay. So you're telling me that if I logged on
14 as 3206, I would get the screens at -- some form of the
15 screen at Exhibit 10, which is the thing that -- the pages
16 that you -- Mr. Nichols sent?

17 A. Yes; yes.

18 Q. Okay. And that would be a permanent?

19 A. What Mr. Nichols sent would be a permanent
20 allow.

21 Q. Okay. But if she signed on as a 3206 PM, the
22 override is a temporary override?

23 A. Yes.

24 Q. And then you're not quite sure of the makeup,
25 but there's some -- some specified time that they would be

1 able to --

2 A. Right. To specify how long to do the temporary
3 allow.

4 Q. Okay. Those temporary allows, is that only for
5 websites or is it for category overrides -- category
6 overrides as well?

7 A. It's only for websites.

8 Q. Okay. So do you remember earlier when you were
9 looking at this sheet and you made the correction, you
10 said, oh, yeah, I'm sorry, looks like they did override
11 the new URL?

12 A. It does look like that.

13 Q. Okay. And that was on Exhibit 9 back on May 14
14 of 2009. Where would they -- well, they disabled that for
15 a period of time, of minutes. Where would that happen?
16 Would that happen using the PM account?

17 A. It looks like she didn't use the PM account to
18 do that. She used the main administrator account or what
19 we call the sysop account.

20 Q. Okay. Is that consistent with what you told me
21 earlier?

22 A. The sysop has more access to make changes or the
23 3206 is the sysop account. It has the ability to make
24 more changes than the 3206 PM which can just do the
25 overrides, the temporary overrides.

1 Q. Okay. But you're telling me the sysop account
2 could do both?

3 A. I'd have to go back and look to make sure, but
4 it looks like she was able to do a temporary override on
5 the URL, but I'd have to go back and look at how that
6 works.

7 Q. But the PM account only does overrides?

8 A. Yes.

9 Q. And you're certain it goes to websites?

10 A. I'm pretty sure.

11 Q. But not categories?

12 A. Yeah, I'm not a hundred percent certain. I
13 think it just goes to websites.

14 Q. Okay. So you're certain it can override
15 websites and that would be the -- well --

16 A. And the reason is because you get the deny page
17 on a specific website and then you go in and allow access
18 to the website.

19 Q. So look at that same page that we have this
20 new -- on Exhibit 9 and in the May 14 time frame and we
21 were earlier talking about how she disabled the filtering
22 for that whole category for an hour.

23 A. That's what it looks like.

24 Q. And she did it using the 3206 account?

25 A. Yes.

1 Q. All right. Not a temporary override?

2 A. Yes.

3 Q. But now go down to the Small World Vacations
4 one.

5 A. Okay.

6 Q. So she similarly -- or whoever signed in as a
7 3206?

8 A. Yeah.

9 Q. And they disabled it for a period of time, so
10 that's a website that's disabled for a period of time?

11 A. Yes.

12 Q. So does that show you they could do both on both
13 the sysops and the override account?

14 A. The override -- she's using the sysop account.
15 If you notice there's no PM account next to those.

16 Q. Right.

17 A. So she's using -- she's only using the sysop
18 account. She's not using the override account.

19 Q. Okay. But she's able to override for periods of
20 time?

21 A. Using the sysop account, yeah.

22 Q. And then in terms of the other account, if she
23 were to type in a PM, she could override the website --

24 A. Yes.

25 Q. -- for a period of time and you think, but are

1 not certain, that she could do a category as well?

2 A. I'm not sure if she could or not.

3 Q. Okay. Because this is the only category we were
4 able to find at this point?

5 A. That's the only one I saw.

6 Q. Okay. Could anybody in the library use these
7 passwords or user names if the librarian gives them access
8 to it? There's no way of knowing it is a particular
9 person signing on?

10 A. Correct.

11 Q. For both, either one of those?

12 A. Right; right.

13 Q. All right. On the second page of this e-mail
14 which we've marked as Exhibit 14, which is the e-mail from
15 Miss Wall, the Reporting Options in MOREnet-hosted
16 Internet Content Filtering.

17 A. Yes.

18 Q. Okay. I see two reports at least listed there.
19 One says a Daily Category Activity Report?

20 A. Yes.

21 Q. Is that a report you're familiar with?

22 A. Somewhat.

23 Q. Is it something that we've -- that you produced
24 in any of these documents?

25 A. I don't think I ever produced any kind of

1 reports.

2 Q. Well, if you recall early in the deposition I
3 asked you about the -- how we used different words for
4 Internet Content Filtering account change log and web
5 admin change log and web admin log and user activity log?

6 A. Uh-huh.

7 Q. Is that Daily Category Activity Report, is that
8 the user activity log that you keep for two weeks or is
9 that something different?

10 A. This is a little bit different. This report,
11 the one that it's referring to up here, it will give them
12 a summary of the category activity happening, like which
13 categories were hit. We don't allow them -- if we're
14 hosting it for them, we don't allow them to drill down to
15 see specific user information because they would be able
16 to see everybody's in every organization. So we give them
17 a very broad report and it really doesn't give them a
18 whole lot of information.

19 Q. So you say categories, it's not just blocked
20 categories, but any categories or is it just blocked?

21 A. It could be categories that are being hit as
22 people try to visit a website. So, for example, if they
23 visit a website that is categorized as, I don't know, new
24 URL -- well, that was not a very good one. We talked
25 about alternative lifestyles a while ago. It would say

1 maybe this -- this many hits for alternative lifestyle.

2 Q. Okay. Are these report -- it says, "Reporting
3 options." Are these -- you have subscribed to these, you
4 have to request these reports?

5 A. The library has to request them from us and we
6 would set them up to be e-mailed to the sysop account or
7 the person whose e-mail they give us.

8 Q. Do you know if Salem subscribed to the Daily
9 Category Activity Report?

10 A. I think one of the documents I provided shows
11 which reports they were trying to subscribe to and I think
12 they were trying to get all of them.

13 Q. Okay. What is the Weekly Site Activity Report?

14 A. That's very similar, only it's on a weekly basis
15 instead of a daily basis.

16 Q. Okay. So they could see how many people are
17 trying to reach sites that were classified as occult if
18 they subscribed to it and read it?

19 A. Yes.

20 Q. Okay. Go down to the next category, it says,
21 "Training"?

22 A. Yes.

23 Q. "Available classes are listed on the MOREnet
24 training schedule." In order to get this account and
25 ability to do this, do they have to be trained?

1 A. No.

2 Q. Do you know if they were trained?

3 A. I don't know.

4 Q. Do you know what the effect -- regarding those
5 reports, the Daily Category Activity Report and Weekly
6 Site Activity Report, the effect of a non-MOREnet
7 filtering program, such as Century Guard, would have on
8 the report?

9 A. I'm not real sure. I think it would depend on
10 how it's configured. It could look -- it could be
11 configured that it comes from the same IP address or the
12 same computer. I'm really not sure what it would do
13 because if it's identifying, like it says here, "For each
14 IP range assigned to your institution," I'm just not sure
15 how Century Guard does that.

16 Q. Can we go to Exhibit 9, which is the Internet
17 Content Filtering Account Log -- Account Change Log? Go
18 to page three. The second entry for page three, we talked
19 about this one, this is where they've added the
20 missourilottery.com to an allow list?

21 A. Yes.

22 Q. And they would have done it through that
23 web-based program that we've identified as the screen
24 shots in Exhibit 10?

25 A. Yes.

1 Q. Okay. Unless they come back and reblock it,
2 which they could do, correct? I mean, after they allow it
3 permanently, they could come back and say we're not going
4 to allow it?

5 A. Sure, they can.

6 Q. Okay. Could you go to August 5 of 2009?

7 A. Okay.

8 Q. Do you know why they would have to ask --
9 lottery, it's a different web address. I see that. MO
10 Lottery versus Missouri Lottery.

11 A. Yes.

12 Q. Okay. I was wondering why they would ask -- why
13 they would reprompt you to try to allow it for a period of
14 time and so if it's a different web address --

15 A. You have to start over.

16 Q. -- you have to start over. Okay. Okay. Fair
17 enough. All right. If you go to the first page, let's
18 just go over the headings. So the date, for lack of a
19 better term, that's military time, so --

20 A. Yes.

21 Q. And do you know, is it set up central time? So
22 if I look and something happens at 8 P.M. at night, I
23 can --

24 A. It would be Missouri time.

25 Q. It would be Missouri time, okay. User Names.

1 **If it's a spelled name, it's a MOREnet employee?**

2 A. Most likely, yeah.

3 **Q. I mean, do you know of another one that --**

4 A. Well, there's admin, which is probably a MOREnet
5 employee, Jansing. Yeah, it looks like they're all
6 MOREnet employees.

7 **Q. The only numbers, those would be -- those are**
8 **changes at Salem?**

9 A. That was someone using their ID, yes.

10 **Q. Okay. Could someone at MOREnet gain the system**
11 **and actually sign in as someone from Salem or not?**

12 A. We can use their user ID to sign in.

13 **Q. You can?**

14 A. Uh-huh.

15 **Q. Okay. Is that common practice?**

16 A. No, not usually.

17 **Q. Okay. What would be a reason -- a motive for**
18 **doing that?**

19 A. If the user was saying their password doesn't
20 work.

21 **Q. All right. IP Address, are those -- are those**
22 **fixed numbers? Are those fixed like mailing addresses?**

23 A. They are -- it's like an ID number for a
24 computer.

25 **Q. Okay.**

1 A. And so it's identifying which computer that's
2 coming from, that particular action.

3 Q. So, again, I'm not an expert here, so that 207
4 starting number, I mean, can you look at that and say
5 that's coming from our offices at MOREnet?

6 A. Yes, that's Rebecca's work station.

7 Q. It is. All right. If we go down to the 3206
8 numbers, they seem to be in close proximity, but there
9 seems to be some numbers that change at the end, 4, 21,
10 20?

11 A. Yeah.

12 Q. Why would those change?

13 A. They would be different work stations, probably,
14 at the library.

15 Q. Okay. But if the beginning numbers were all
16 similar, you would just say it's -- you know, they have 16
17 computers and they just sat at a different computer to do
18 that change?

19 A. Yes. That's most likely what happened. They
20 may not have -- there are 254 addresses that they could be
21 assigned, but they may only have a fraction of those.

22 Q. 200 and what was that?

23 A. 254.

24 Q. Is that per IP address?

25 A. A range, it's a range of IP addresses.

1 Q. Okay. And that's -- you're saying Salem would
2 have that range?

3 A. They would have a portion of that range.

4 Q. Okay.

5 A. So if I saw another IP address outside of the
6 range that Salem's supposed to have, then somebody else is
7 doing it.

8 Q. Okay. So the next category -- the next column
9 is Action?

10 A. Yes.

11 Q. What is the difference between policy and, say,
12 disabled, you know, something that starts with disabled?

13 A. I'm not sure. It would -- there's a policy
14 manager that it's possible that that's what they're
15 affecting. A policy manager is one of the sections in the
16 web administrator interface. I'm not sure.

17 Q. Okay. Okay. Type, earlier you said you don't
18 know what that means, the next column?

19 A. I'm not sure.

20 Q. Okay. And what about Group?

21 A. Group would be the particular group that was
22 affected by the action.

23 Q. Are all the libraries at Salem Library in that
24 group?

25 A. Salem -- all the libraries have their own group.

1 Q. Okay.

2 A. Salem has the group 3206 Salem Public Library.

3 Q. That's their group?

4 A. That's their group.

5 Q. They don't have any subgroups?

6 A. I don't think so.

7 Q. Okay. So the -- if there's a computer in the
8 librarian's office in the back and then there's ten, you
9 know, for the patrons, it would all be under the same --
10 it would have the same effect?

11 A. Yes.

12 Q. I don't have any other questions on that one,
13 thanks. The last one is, "MOREnet's policies, practice
14 and customs regarding compliance with CIPA."

15 A. Yes.

16 Q. And are you designated to talk about that?

17 A. Yes, I am.

18 Q. All right. And prepared to do so?

19 A. I am.

20 Q. And did you bring any documents on that one?

21 A. No, I didn't.

22 Q. Okay. So tell me your view in terms of
23 MOREnet's obligations under CIPA, if any?

24 A. MOREnet receives E-rate money for connections
25 that we provide to our members. One of the requirements

1 of E-rate is that they be CIPA compliant. So we require
2 that our members be CIPA compliant so that MOREnet can
3 obtain the E-rate money. If they don't wish to be CIPA
4 compliant, then they have to pay us the difference.

5 **Q. Do you have anybody who chooses not to be CIPA**
6 **compliant?**

7 A. Yes, we do.

8 **Q. Okay. Is it many?**

9 A. No.

10 **Q. Okay. Is Salem one of --**

11 A. No, not to my knowledge.

12 **Q. Okay. Salem receives E-rate money?**

13 A. We --

14 **Q. Or, actually, do you receive it or does it go**
15 **through the libraries?**

16 A. MOREnet receives the E-rate money for the
17 connection that goes to the library.

18 **Q. Okay.**

19 A. The library can file for E-rate themselves on
20 other things.

21 **Q. Okay. All right. Is your default web settings**
22 **intended to be CIPA compliant?**

23 A. The default settings that we have today as of
24 July 2011 are designed to help them be CIPA compliant.

25 **Q. Okay. And where does that obligation to be CIPA**

1 compliant rest? Is it on you or is it on them?

2 A. It's on them.

3 Q. It is on them. Okay. Prior to the July 2011,
4 was it different? Was the policy different, the practice
5 different?

6 A. For CIPA compliance?

7 Q. No, no -- yes. For CIPA compliance, but was --
8 I'm talking about MOREnet's policies, was it different
9 before July 2011?

10 A. I'm not sure which policies you're talking
11 about.

12 Q. For CIPA.

13 A. We've always had the same policies for CIPA
14 compliance since it came out.

15 Q. Are they written policies?

16 A. If they are, they would be on the public web.

17 Q. Has anyone -- any of your members'
18 qualifications for E-rate money been challenged because of
19 inadequate web filtering provided by MOREnet?

20 A. Some of the E-rate funds that MOREnet has
21 provide -- has applied for have been challenged, but I
22 don't know the reasons.

23 Q. Can you give me an example?

24 A. Of when it's been challenged?

25 Q. Yeah. I mean --

1 A. I'm not part of the E-rate program, so I
2 really -- I know that it has in the past, but I don't know
3 the specifics.

4 Q. You don't know -- I mean, was it like a parent
5 that challenged and said my kid shouldn't have access to
6 something and -- is that how it came to the attention of
7 someone and said they shouldn't get their money?

8 A. No. It's the people who administer the E-rate
9 funds, they had some kind of disagreement on what we were
10 filing with them and so they withheld the money until it
11 was cleared up.

12 Q. Okay. But it wasn't -- as far as you know, it
13 wasn't a filtering issue of needing to filter more or --

14 A. As far as I know, no.

15 Q. -- requiring to filter less? It wasn't a
16 technical issue, it was maybe administrative?

17 A. As far as I know.

18 Q. Okay. How about -- CIPA is a federal -- federal
19 requirement. What about the state requirement under -- I
20 can cite the law. It was Section 182.825, 182.827. Do
21 you know if that provides -- requires anything different
22 of MOREnet than CIPA?

23 A. I'm not aware that it does.

24 Q. Okay. Do you have any specific MOREnet policies
25 regarding that Missouri law?

1 A. Not any different than the federal law.

2 Q. Okay. Does MOREnet interpret the CIPA
3 requirement as an obligation to filter or an obligation
4 to -- to be not -- not filter as much? I mean, is there a
5 right amount of filtering for CIPA? I mean, can you over
6 filter?

7 A. Yeah. CIPA requires that you filter for
8 pornographic images. It doesn't say how to do it. It
9 just says you have to do that. And that's one of several
10 requirements that CIPA has.

11 Q. And pornographic images is one, what's another?

12 A. Another requirement that came out recently, just
13 this July, was that schools now have to provide training
14 to students on cyber bullying.

15 Q. Any others that you're aware of?

16 A. There's like four, five requirements. They have
17 to go through a review period on their acceptable use
18 policies. That has to go through the board and has to be
19 approved by the board. That's another one.

20 Q. Are you talking about the school, the particular
21 school boards?

22 A. In this case, it's library boards, also.

23 Q. The library boards, okay.

24 A. Uh-huh.

25 Q. In terms of the policies that the boards have to

1 **approve, does MOREnet provide guidance to the libraries on**
2 **how they can do that?**

3 A. We provide them links to resources on the web --
4 on the public web, the internet, that they can refer to.
5 If they discuss specific questions, we tell them to talk
6 to their attorney.

7 MR. DOTY: Okay. Smart, smart. Okay. Well, I
8 don't have any more questions.

9 THE WITNESS: Okay.

10 MR. DOTY: But he gets a chance. I promised you
11 when I would be done. Thank you very much. I know
12 depositions are hard, so I appreciate it. Thank you.

13 MR. HARPOOL: I'll just stay here, understanding
14 our court reporter is behind you, so you make sure that
15 she can understand us, okay?

16 THE WITNESS: Okay.

17 EXAMINATION BY MR. HARPOOL:

18 **Q. My name is Doug Harpool. I do represent the**
19 **Salem Library District and also its director, okay?**

20 A. Okay.

21 **Q. I'm not going to have very many questions. I'm**
22 **going to start with just an understanding of what your**
23 **employer is. Is that the University of Missouri?**

24 A. Yes. MOREnet is the Missouri Research and
25 Education Institution -- or Network, sorry. We are a

1 department of the University of Missouri System. We are
2 membership driven and we provide internet connections and
3 internet-based services to our membership.

4 **Q. The -- is there a advisory board or an actual**
5 **governing board, other than obviously there's a board of**
6 **curators, but does your particular agency have a governing**
7 **board or an advisory board?**

8 A. We have what we call the MOREnet Council, which
9 consists of members from different member groups.

10 **Q. And one of the member groups, I understand it,**
11 **is municipal library or library districts?**

12 A. Yes.

13 **Q. Who is the -- who would be your boss, immediate**
14 **boss?**

15 A. My immediate boss is Natasha Angell.

16 **Q. All right. And does she have a boss in MOREnet?**

17 A. Yes.

18 **Q. Who is that?**

19 A. John Gillispie.

20 **Q. All right. And does he have a boss?**

21 A. That would be somebody at the university.

22 **Q. Okay. In terms of actual MOREnet, he would be**
23 **the top -- the top of the chain?**

24 A. Yes.

25 **Q. All right. And what is Natasha's title?**

1 A. Director of Member Services.

2 Q. Members pay a fee?

3 A. Yes.

4 Q. And one of the things that your organization
5 does, as I understand it, is provide the screening that
6 we've been talking about today for libraries and schools?

7 A. Yes.

8 Q. And the software that you've used since '09 is
9 by Netsweeper?

10 A. Yes.

11 Q. Now, I assume that's a proprietary software that
12 they own and we license somehow?

13 A. That's right.

14 Q. And in terms of the Salem library, that software
15 is kept on MOREnet's computers and not on Salem's
16 computers?

17 A. That's right.

18 Q. You used the phrase a couple of times "my
19 contact at Netsweeper", but I don't know that I ever got a
20 name.

21 A. Oh, I'm sorry. I've had different ones over the
22 years. My current one right now, his name is Scott
23 O'Neill.

24 Q. And how long has he been there?

25 A. He's been at Netsweeper, I'm not exactly sure,

1 maybe a couple of years.

2 Q. And where are their offices?

3 A. Canada.

4 Q. I'm sorry?

5 A. Canada.

6 Q. All right. Does he come from Canada when he
7 comes to work with you?

8 A. Yes.

9 Q. In other words, they don't have a regional
10 office or a district office that you know of?

11 A. They do have some United States-based offices.
12 I think there's one down in Texas and one over on the east
13 coast.

14 Q. But the one that at least you have contact with
15 is the one in Canada?

16 A. Yes.

17 Q. And is Mr. O'Neill a customer service marketing
18 type person or is he the actual computer programming whiz?

19 A. He works with the customers.

20 Q. I guess I'm trying to get an understanding of
21 what -- how Netsweeper works and it may be beyond you. If
22 it is, don't speculate. Does -- is it your understanding
23 that they take all the URLs and divide them into
24 categories and that's how they screen URLs or do they
25 take certain words or images and their software screens

1 **URLs to block them?**

2 A. So they have a kind of algorithm, I believe,
3 that they use and so when somebody goes to a website,
4 first they look at the URL to see if there's anything
5 weird in there and then they actually look at the words on
6 the page, both the hidden code and the words that are
7 displayed, for any kind of objectionable material. And
8 then they categorize the web page based on the different
9 things that it finds.

10 **Q. The reason I ask, I notice, for example, some**
11 **news outlets were blocked.**

12 A. Yes.

13 **Q. And do you think that's a product of somebody at**
14 **Netsweeper looking through the news outlet page and**
15 **finding something they thought was objectionable or a**
16 **particular news story that happened to run across?**

17 A. A lot of times a website will have pop-ups or
18 other little things that are popping up on the page. It
19 looks like it's part of the page, but really it's a
20 separate web page and sometimes those little
21 advertisements, those rolling advertisements or something,
22 can have bad stuff in them. So when it looks like it's
23 blocking a news page, it might be one of those rolling
24 advertisements on that page.

25 **Q. When it -- do you think that each time somebody**

1 **tries to access a URL Netsweeper does an immediate**
2 **analysis of the content at that time?**

3 A. Yes, they do.

4 Q. Okay. So it's not necessarily based on some
5 **list that's created in advance?**

6 A. It gets added to the list they already have.

7 Q. And my thought is the content of certainly news
8 **web pages may change frequently?**

9 A. Yes.

10 Q. So once someone -- a URL is blocked, do you know
11 **under Netsweeper software how they get reapproved or**
12 **unblocked?**

13 A. The individual organizations can go in and
14 unblock them or if they think it has been miscategorized,
15 they can submit a URL to Netsweeper to recategorize it.

16 Q. Now, these categories that Netsweeper has, you
17 **said that you, from time to time, may get something on the**
18 **definitions, but you can only remember getting one in the**
19 **last three years or so?**

20 A. Yeah. They're not very forthcoming about their
21 changes.

22 Q. Are those distributed to your members?

23 A. I think we did when we first rolled the service
24 out, the Netsweeper out, but periodic changes, we don't.

25 Q. The definitions of these categories when you

1 first rolled out Netsweeper, do you have those?

2 A. If I do, they would be provided in the
3 documentation on the CD.

4 Q. Do you know -- do you have any definitive
5 recollection of what you would have forwarded, for
6 example, to the Salem library?

7 A. No, I don't.

8 Q. As I understand it, when you switched to
9 Netsweeper in April of '09, there were 28 default
10 categories that were blocked?

11 A. Yes.

12 Q. And those are the categories which Salem
13 adopted?

14 A. Yes.

15 Q. And -- so basically it was just the default
16 categories and no more, to your knowledge?

17 A. To my knowledge.

18 Q. And then via an e-mail in February 25, 2010,
19 eight months later or so, Glenda took up Craig from your
20 office's suggestion and they cut down the blocked
21 categories to less than half of what they originally were?

22 A. Yes.

23 Q. Did I hear right that there were 11, we ended up
24 deciding there were then 11 categories?

25 A. Yes.

1 Q. So it went from 28 categories blocked in April
2 of 2009 to 11 categories blocked in February of 2010?

3 A. Yes.

4 Q. And, again, those were the default categories
5 that Salem adopted?

6 A. Yeah. He changed the default categories.

7 Q. And the default categories, as I understand
8 them, are the ones that MOREnet has established to help
9 ensure compliance with the Child Pornography Act?

10 A. Today, yes.

11 Q. The default categories, were they commonly
12 adopted by libraries across the state?

13 A. The 28?

14 Q. Yes.

15 A. Yeah.

16 Q. And then when it went down to 11, was that
17 commonly adopted by libraries across the state?

18 A. That I don't know.

19 Q. But anyway, then on August 1, 2011, Salem
20 library further reduced the number of blocked categories
21 to six?

22 A. Yes.

23 Q. And that is the five default and then they
24 didn't like to have web chat going on?

25 A. That's correct.

1 Q. So really since 2000 -- from 2009 to today, with
2 the exception of web chat, the only categories the Salem
3 Public Library has blocked have been the default
4 recommendations?

5 A. I don't know of any -- I don't know what changes
6 they made between that time.

7 Q. In terms of changes at your location?

8 A. That we did for them?

9 Q. Yes.

10 A. Those are the only ones I'm aware of.

11 Q. And then you have correctly pointed out they
12 have the option maybe locally to block something else?

13 A. Yes.

14 Q. And all you can tell me today is about what they
15 have blocked through MOREnet?

16 A. Yes.

17 Q. That's fair and thank you for straightening that
18 out. Now, you have told me, though, as I understand it,
19 that even where a web page is blocked, it can be accessed
20 or overridden by the local library?

21 A. Yes, it can.

22 Q. And, in fact, Exhibit 9 were several examples of
23 where that actually took place?

24 A. Yes.

25 Q. And if you would turn to Exhibit 9 and in

1 particular an entry of 11-12-2010 at 10:46.

2 A. Okay.

3 Q. 11-12-2010, 10:46.

4 A. Uh-huh.

5 Q. They did disable the filtering for
6 www.witchcraft.com?

7 A. Yes, they did.

8 Q. Allowing a patron access to that web page,
9 correct?

10 A. Yes, they did.

11 Q. I won't go through each of the times they
12 disabled it, but that's evidence that they had that
13 opportunity, correct?

14 A. Yes.

15 Q. Now, do you know of any way for them to disable
16 the block for a web page without knowing the web page
17 involved?

18 A. They'd have to know the web page.

19 Q. And so a patron would have to say I want to
20 access this web page in order for them to have the ability
21 to give temporary access to that web page?

22 A. Yes.

23 Q. Or, for that matter, to permanently approve the
24 URL for that web page?

25 A. Yes.

1 Q. Do you know if the Salem library is one of those
2 libraries attempting to be CIPA compliant?

3 A. As far as I'm aware, they are.

4 Q. Do you know what funds they receive? It may be
5 beyond you.

6 A. I don't know.

7 MR. HARPOOL: That's all I have.

8 MR. DOTY: Not too bad. Thank you very much.

9 MS. MARKIE: Are you going to want to sign it
10 or --

11 THE WITNESS: Today?

12 MS. MARKIE: Not today, when she finishes the
13 transcription.

14 THE WITNESS: I guess.

15 MS. MARKIE: It's the first time for her. We
16 may as well.

17 (Off the record.)

18 MR. DOTY: We're back on the record just to
19 identify the notebook that was produced in response to the
20 subpoena, in particular Enclosure 2 to that subpoena.

21 That notebook we're going to mark as Exhibit 2A. It also
22 includes some -- two CDs and one DVD, which we'll copy.

23 THE WITNESS: Yes. Do I copy those or do you?

24 MR. DOTY: I'll copy them. I'll take the CDs
25 and DVD. We'll do that.

1 (Plaintiff's Exhibit No. 2A marked for
2 identification.)

3 MR. HARPOOL: I want an e-tran, but I want all
4 the exhibits scanned.

5 MR. DOTY: E-tran and a regular, full copy, and
6 then I need all the exhibits. Just the original exhibits
7 with the original transcript.

8 (Proceedings concluded at 2:21 P.M.)

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CERTIFICATE OF REPORTER

I, Julie K. Kearns, Certified Court Reporter (MO), Certified Shorthand Reporter (IL), Registered Professional Reporter and Certified Realtime Reporter within and for the State of Missouri, do hereby certify that the witness whose testimony appears in the foregoing deposition was duly sworn by me; the testimony of said witness was taken by me to the best of my ability and thereafter reduced to typewriting under my direction; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this deposition was taken, and further that I am not a relative or employee of any attorney or counsel employed by the parties thereto, nor financially or otherwise interested in the outcome of the action.

Julie K. Kearns, CCR, RPR, CRR

1 Midwest Litigation Services

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September 9, 2012

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8 Kathleen Murphy Markie, Esq.
UNIVERSITY OF MISSOURI SYSTEM
9 OFFICE OF THE GENERAL COUNSEL
227 University Hall

10 Columbia, Missouri 65211

11

In Re: Anaka Hunter vs. Board of Trustees, Salem
12 Public Library, et al.

13

Dear Ms. Markie:

14

Please find enclosed your copy of the deposition of
15 CONNIE STICKNEY, taken on August 30, 2012 in the
above-referenced case. Also enclosed is the original
16 signature page and errata sheets.

17

Please have the witness read your copy of the
transcript, indicate any changes and/or corrections
18 desired on the errata sheets, and sign the signature
page before a notary public.

19

Please return the errata sheets and notarized signature
20 page to Mr. Doty for filing prior to trial date.

21

Thank you for your attention to this matter.

22

Sincerely,

23

24 Julie K. Kearns

25

CC: Grant R. Doty, Esq.

1 Errata Sheet

2 Witness: CONNIE STICKNEY

3 In Re: Anaka Hunter vs. Board of Trustees, Salem
Public Library, et al.

4

5 Upon reading the deposition and before subscribing
6 thereto, the deponent indicated the following changes
7 should be made:

8

Page Line Should read:

9 Reason assigned for change :

10 Page Line Should read:

Reason assigned for change :

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Page Line Should read:

12 Reason assigned for change :

13 Page Line Should read:

Reason assigned for change :

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Page Line Should read:

15 Reason assigned for change :

16 Page Line Should read:

Reason assigned for change :

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Page Line Should read:

18 Reason assigned for change :

19 Page Line Should read:

Reason assigned for change :

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Page Line Should read:

21 Reason assigned for change :

22 Page Line Should read:

Reason assigned for change :

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Page Line Should read:

24 Reason assigned for change :

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Witness Signature:

Reporter: Julie K. Kearns

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I, CONNIE STICKNEY, do hereby certify:

That I have read the foregoing deposition;

That I have made such changes in form and/or substance to the within deposition as might be necessary to render the same true and correct;

That having made such changes thereon, I hereby subscribe my name to the deposition.

I declare under penalty of perjury that the foregoing is true and correct.

Executed the _____ day of _____, 20____,
at _____.

_____.

CONNIE STICKNEY

My Commission Expires: _____

Notary Public: _____

JK

A				
ability 65:12	60:20,22	120:6	adopted	93:5,20,24
65:14 80:11	75:1,11	adding 55:18	121:13	94:24 98:11
81:22 99:23	87:10 96:2	58:11	122:5,12,17	98:20 99:3
104:25	96:9,13	addition	adult 87:15	100:17
124:20	98:10 99:16	75:10	87:17,20	103:13,14
127:8	99:17,18,19	additional	advance 120:5	105:20
able 45:5	99:23 100:1	34:7 39:1	advertisem...	106:2,4,13
48:17 51:6	100:7,24	40:14,15	119:21,21	allowed 34:13
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Errata Sheet

Witness: CONNIE STICKNEY
In Re: Anaka Hunter vs. Board of Trustees, Salem
Public Library, et al.

Upon reading the deposition and before subscribing
thereto, the deponent indicated the following changes
should be made:

Page 11 Line 12 Should read: *It's from*
Reason assigned for change : *Corrected transcription*
Page 28 Line 15 Should read: *Internet Content Filtering*
Reason assigned for change : *Corrected name of service*
Page 28 Line 16 Should read: *Service that Salem*
Reason assigned for change : *Corrected name of service*
Page 28 Line 19 Should read: *It means we host it*
Reason assigned for change : *Corrected terminology*
Page 31 Line 18 Should read: *Netsweeper Software only*
Reason assigned for change : *Corrected name of product*
Page 32 Line 7 Should read: *Centurion Guard*
Reason assigned for change : *corrected name of product*
Page 33 Line 11 Should read: *Centurion Guard*
Reason assigned for change : *corrected name of product*
Page 33 Line 19 Should read: *Centurion Guard*
Reason assigned for change : *Corrected name of product*
Page 34 Line 3 Should read: *Centurion Guard*
Reason assigned for change : *corrected name of product*
Page 34 Line 9 Should read: *Centurion Guard does not prevent*
Reason assigned for change : *corrected name of product/typo*
Page 36 Line 9 Should read: *Centurion Guard*
Reason assigned for change : *corrected name of product*
Witness Signature: *Connie Stickney*
Reporter: Julie K. Kearns

1 Errata Sheet

2 Witness: CONNIE STICKNEY

3 In Re: Anaka Hunter vs. Board of Trustees, Salem
Public Library, et al.

4
5 Upon reading the deposition and before subscribing
6 thereto, the deponent indicated the following changes
7 should be made:

8 Page 53 Line 8 Should read: *if you need me to get one*

9 Reason assigned for change : *corrected typo*

10 Page 55 Line 16 Should read: *interface*

11 Reason assigned for change : *corrected terminology*

12 Page 65 Line 14 Should read: *ability at your desk*

13 Reason assigned for change : *corrected terminology*

14 Page 67 Line 21 Should read: *Nothing shouted*

15 Reason assigned for change : *corrected typo*

16 Page 69 Line 12 Should read: *they were presented*

17 Reason assigned for change : *corrected missing word*

18 Page 72 Line 15 Should read: *get a newsletter from Netsweeper*

19 Reason assigned for change : *corrected company name*

20 Page 87 Line 6 Should read: *administrator interface*

21 Reason assigned for change : *corrected name of program*

22 Page Line Should read:

23 Reason assigned for change :

24 Page Line Should read:

25 Reason assigned for change :

26 Page Line Should read:

27 Reason assigned for change :

28 Page Line Should read:

29 Reason assigned for change :

30 Witness Signature: *Connie Stickney*

31 Reporter: Julie K. Kearns

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I, CONNIE STICKNEY, do hereby certify:

That I have read the foregoing deposition;

That I have made such changes in form and/or substance to the within deposition as might be necessary to render the same true and correct;

That having made such changes thereon, I hereby subscribe my name to the deposition.

I declare under penalty of perjury that the foregoing is true and correct.

Executed the 4th day of October, 2012,
at Columbia MO.

Connie Stickney
CONNIE STICKNEY

My Commission Expires: 2/28/16

Notary Public: Lori L. Robinett

JK

