

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

ANAKA HUNTER,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 4:12-CV-4 ERW
)	
CITY OF SALEM, MISSOURI, et al.,)	
)	
Defendants.)	

JOINT MOTION FOR ENTRY OF CONSENT JUDGMENT

Come now Plaintiff and Defendants, through their respective counsel, and jointly move this Court for entry of a proposed Consent Judgment. In support, they state:

1. On January 3, 2012, Plaintiff filed this challenge to the filtering practices of the Salem Public Library by asserting violations of her rights under the First and Fourteenth Amendments. In particular, she claimed that the initial blocking of certain content violated her free-speech right to receive information and the blocking of information about minority religions based on viewpoint violated the Establishment Clause by giving official preference to certain religious viewpoints while blocking others. (Doc. # 1).

2. The parties have conferred and reached an agreement with respect to all issues in this case.

3. The parties' agreement is reflected in a proposed consent judgment. Subject to this Court's approval, the consent judgment will enjoin Defendants from activating content filtering category blocks other than "adult image," "pornography," "phishing," "proxy anonymizer," "viruses," or "web chat," except as specifically required and necessary to comply with federal or state law. Each party will bear its attorneys' fees and costs.

4. Entry of the proposed consent judgment would fully and finally resolve the claims asserted in Plaintiff's Complaint.

5. The proposed Consent Judgment is attached hereto and emailed in Word format to MOED_Proposed_Orders@moed.uscourts.gov.

WHEREFORE the parties jointly move this Court to enter the agreed upon Consent Judgment and deny all pending motions as moot.

/s/Matt Cologna

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CERTIFICATE OF SERVICE

I hereby certify that on March 1, 2013, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system and a copy was made available electronically to all electronic filing participants.

/s/ Anthony E. Rothert