

The Honorable Edward F. Shea

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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON  
AT SPOKANE

SARAH BRADBURN, PEARL  
CHERRINGTON, CHARLES HEINLEN  
and the SECOND AMENDMENT  
FOUNDATION,

Plaintiffs,

v.

NORTH CENTRAL REGIONAL LIBRARY  
DISTRICT,

Defendant.

No. CV-06-327-EFS

**PLAINTIFFS' FIRST SUPPLEMENT  
TO INITIAL DISCLOSURES  
PURSUANT TO FED.R.CIV.P.  
26(a)(1) AND (e)(1)**

TO: The NORTH CENTRAL REGIONAL LIBRARY DISTRICT;

AND TO: THOMAS D. ADAMS and CELESTE M. MONROE of KARR TUTTLE  
CAMPBELL, attorneys of record for the North Central Regional Library  
District.

Plaintiff hereby supplements its initial disclosures pursuant to Fed.R.Civ.P. 26(a)(1)  
and (e)(1).

(A) The name and, if known, the address and telephone number of each individual  
likely to have discoverable information that Plaintiffs may use to support their claims or  
defenses, unless solely for impeachment, identifying the subjects of the information:



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Kenton L. Oliver  
Executive Director  
Stark County District Library  
715 Market Avenue N.  
Canton, OH 44702  
330-452-0665

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Mr. Oliver is a librarian, and serves as the Executive Director of the Stark County District Library (“SCDL”), headquartered in Canton Ohio. He also chairs the American Library Association’s Intellectual Freedom Committee. The SCDL’s Internet policy can be viewed at <http://www.starklibrary.org/uploads/InternetandComputerUsePolicy-801.pdf>, and its Internet procedures can be viewed at <http://www.starklibrary.org/uploads/InternetProceduresFinal200503-802.pdf>. By default, Internet access at the SCDL is filtered. However, any person over the age of 16 wishing to bypass the filter and access blocked Web sites may do so by entering his or her library card number. The SCDL’s staff will also disable the library’s filter at the request of an adult who does not have an SCDL library card. With their parents’ permission, children under 16 may obtain library cards allowing them to bypass the filter. Mr. Oliver is a fact witness who is expected to testify primarily about the SCDL’s policies, procedures and experiences with regard to Internet filters. He has information regarding alternatives to refusing to disable Internet filters at the request of adult library patrons; the SCDL’s Internet policies and procedures; how the SCDL’s computer terminals and filter have been configured; how the SCDL’s policies and procedures have been implemented; his experience working with Internet policies, procedures and filters; and the consequences, if any, of allowing patrons of the SCDL to bypass the library’s Internet filter.

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Sally Beesley  
Director, Jefferson County Library District  
241 Southeast 7th Street  
Madras, OR 97741  
541-475-4678

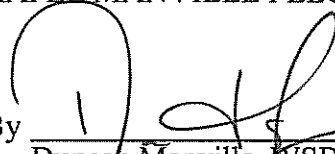
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Ms. Beesley is a librarian, and serves as the Director of the Jefferson County Library District (“JCLD”) in Madras, Oregon. The JCLD’s Internet policy can be viewed at



1 <http://www.jclid.org/PDF-files/Netpolicy.pdf>. Internet access at the JCLD is unfiltered. The  
2 JCLD does not receive e-rate discounts or LSTA funding. Ms. Beesley is a fact witness who  
3 is expected to testify primarily about the JCLD's policies, procedures and experiences with  
4 regard to Internet filters. She has information regarding alternatives to refusing to disable  
5 Internet filters at the request of adult library patrons; the JCLD's Internet policies and  
6 procedures; how the JCLD's computer terminals have been configured; how the JCLD's  
7 Internet policies and procedures have been implemented; her experience working with Internet  
8 policies, procedures and filters; and the consequences, if any, of providing unfiltered Internet  
9 access at the JCLD's computers.

10 DATED this 10<sup>th</sup> day of September, 2007.

11 RAFEL MANVILLE PLLC

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13 By \_\_\_\_\_  
14 Duncan Manville, WSBA #30304  
15 Robert A. Hyde, WSBA #33593  
16 Attorneys for Plaintiffs Sarah Bradburn, Pearl  
17 Cherrington, Charles Heinlen and the Second  
18 Amendment Foundation  
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