

1 THE HONORABLE EDWARD F. SHEA

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8 UNITED STATES DISTRICT COURT
9 WESTERN DISTRICT OF WASHINGTON
10 AT SEATTLE

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

14 Plaintiffs,

15 v.

16
17 NORTH CENTRAL REGIONAL LIBRARY
18 DISTRICT,

19 Defendant

No. CV-06-327-EFS

**APPLICATION TO PROCEED PRO
HAC VICE**

20 Catherine Crump of the American Civil Liberties Union Foundation (“Applicant”)
21 requests permission to participate in this action as counsel for Plaintiffs Sarah Bradburn,
22 Pearl Cherrington, Charles Heinlen, and the Second Amendment Foundation.

23 1. Applicant’s Address and Phone Number:

24 American Civil Liberties Union Foundation, 125 Broad Street, Seventeenth Floor,
25 New York, New York 10004. (212) 519-7806.
26

APPLICATION TO PROCEED
PRO HAC VICE -- 1
Case No. CV-06-327-EFS

AMERICAN CIVIL LIBERTIES UNION
OF WASHINGTON
705 Second Avenue, Suite 300
Seattle, Washington 98104-1799
(206) 624-2184

1 2. Dates of Admission to Practice before Other Courts:

2 California Supreme Court: July 5, 2005

3 United States Court of Appeals for the Ninth Circuit: August 25, 2005

4 United States District Court for the District of Colorado: November 22, 2005

5 United States Court of Appeals for the Tenth Circuit: December 26, 2006

6 United States Court of Appeals for the First Circuit: August 14, 2007

7 3. The name, address and phone number of admitted counsel with whom the applicant
8 will be associated:

9 Duncan Manville, 1629 2nd Avenue W., Seattle, WA 98119; Tel. (206) 390-8164,
10 Fax (206) 624-2190; duncan.manville@gmail.com. Aaron H. Caplan, ACLU of Washington
11 Foundation, 705 Second Avenue, Suite 300, Seattle, WA 98104; Tel. (206) 624-2184, Fax
12 (206) 624-2190; caplan@aclu-wa.org.

13 4. The necessity for appearance by the applicant:

14 Applicant will provide needed additional assistance to aid in the completion of
15 discovery, briefing, and trial preparation. Applicant also has specialized expertise useful for
16 this matter as a result of her prior litigation experience in First Amendment cases involving
17 internet filtering software.
18

19 5. Sanctions:

20 The applicant is not the subject of any pending disciplinary sanctions actions and has
21 never been subject to any disciplinary sanctions by any court or Bar Association.
22

23 6. Residency:

24 Applicant neither resides nor maintains an office for the practice of law in the State
25 of Washington.
26

DATED this 26 day of September, 2007.

By: /s/
Duncan Manville, WSBA #30304
1629 2nd Avenue W.
Seattle, WA 98119
Tel. (206) 390-8164
Fax (206) 624-2190
duncan.manville@gmail.com

By: /s/
Aaron H. Caplan, WSBA #22525
ACLU of Washington Foundation
705 Second Avenue, Suite 300
Seattle, WA 98104
Tel. (206) 624-2184
Fax (206) 326-5272
caplan@aclu-wa.org

Attorneys for Sarah Bradburn, Pearl Cherrington,
Charles Heinlen, and the Second Amendment
Foundation

ORDER

The foregoing Application is hereby approved by the Clerk of the Court.

DATED this _____ day of _____, 20__.

Clerk of the Court

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CERTIFICATE OF SERVICE

I hereby certify that on September 26, 2007, I electronically filed the foregoing with the Clerk of the Court using CM/ECF system, which will send notification of such filing to the persons listed below:

Thomas D. Adams
Karr Tuttle Campbell
1201 Third Ave, Ste. 2900
Seattle, WA 98101-3028

/s/

Aaron H. Caplan, WSBA #22525
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