

The Honorable Edward F. Shea

Thomas D. Adams  
Celeste Mountain Monroe  
KARR TUTTLE CAMPBELL  
1201 Third Avenue, Suite 2900  
Seattle, Washington 98101-3028  
(206) 223-1313  
Attorneys for North Central Regional Library District

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON  
AT SPOKANE

SARAH BRADBURN, PEARL	)	
CHERRINGTON, CHARLES	)	
HEINLEN, and THE SECOND	)	NO. CV-06-327-EFS
AMENDMENT FOUNDATION,	)	
	)	DECLARATION OF THOMAS D.
Plaintiffs,	)	ADAMS IN SUPPORT OF
	)	DEFENDANT'S MOTION FOR
v.	)	SUMMARY JUDGMENT
	)	
NORTH CENTRAL REGIONAL	)	
LIBRARY DISTRICT,	)	
	)	
Defendant.	)	

I, Thomas D. Adams, declare as follows:

1. I am over the age of 18 and competent to testify to the matters set forth herein.

DECLARATION OF THOMAS D.

ADAMS - 1  
CV-06-327-EFS  
#656588 v1 / 42703-001

*Law Offices*  
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1           2.     Attached as **Ex. A** are relevant portions of the transcript from  
2 Mr. Alan Gottlieb's deposition (Second Amendment Foundation 30(b)(6)  
3 deposition) taken September 12, 2007.  
4

5           3.     Attached as **Ex. B** are relevant portions of the transcript from  
6 Ms. Sarah Bradburn's deposition taken August 13, 2007.  
7

8           4.     Attached as **Ex. C** are relevant portions of the transcript from  
9 Ms. Pearl Cherrington's deposition taken August 13, 2007.  
10

11          5.     Attached as **Ex. D** are relevant portions of Ms. Cherrington's  
12 responses to Defendant's First Interrogatories and Requests for Production.  
13

14          6.     Attached as **Ex. E** are relevant portions of the transcript from  
15 Mr. Heinlen's deposition taken on August 13, 2007.  
16

17          7.     Attached as **Ex. F** is a January 15, 2008 article from The Dallas  
18 Morning News, "On Dallas Library Computers, Porn is a Regular Sight,"  
19 obtained on-line January 22, 2008.  
20

21          8.     Attached as **Ex. G** is a August 16, 2003 article from  
22 Brainerddispatch.com, "Librarians Settle Internet Porn Case," obtained on-line  
23 January 30, 2008.  
24

25 //

26 //

28 DECLARATION OF THOMAS D.

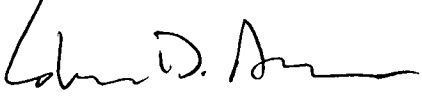
ADAMS - 2  
CV-06-327-EFS  
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I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated this 4<sup>th</sup> day of February, 2007 at Seattle, Washington.



Thomas D. Adams

DECLARATION OF THOMAS D.

ADAMS - 3  
CV-06-327-EFS  
#656588 v1 / 42703-001

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1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on February 4, 2008, I electronically filed the foregoing with the Clerk of the Court  
3 using the CM/ECF system which will send notification of such filing to the persons listed below:

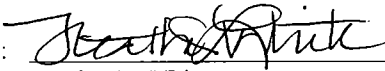
4 Duncan Manville  
5 1629 2nd Ave. W  
6 Seattle, WA 98119

Aaron Caplan  
ACLU of Washington  
705 Second Ave., Ste. 300  
Seattle, WA 98103

6 Notice has been delivered by U.S. Mail to:

7 Catherine Crump  
8 American Civil Liberties Union Foundation  
9 125 Broad Street, 17<sup>th</sup> Floor  
10 New York, NY 10004

11 KARR TUTTLE CAMPBELL

12 By:   
13 Heather L. White  
14 hwhite@karrtuttle.com

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28 **DECLARATION OF THOMAS D.**

**ADAMS - 4**  
CV-06-327-EFS  
#656588 v1 / 42703-001

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