

Exhibit B

1
2 UNITED STATES DISTRICT COURT
3 EASTERN DISTRICT OF WASHINGTON
4 AT SPOKANE
5
6 SARAH BRADBURN, PEARL CHERRINGTON,
7 CHARLES HEINLEN, and THE SECOND
8 AMENDMENT FOUNDATION,
9 Plaintiffs,) NO.
10 vs.) CV-06-327-EFS
11 NORTH CENTRAL REGIONAL LIBRARY
12 DISTRICT,)
13 Defendant.)

14 DEPOSITION UPON ORAL EXAMINATION OF
15 SARAH MARIA BRADBURN

16 TAKEN ON: Monday, August 13th, 2007
17 TAKEN AT: Omak Library
18 30 South Ash
19 Omak, Washington
20 START TIME: 1:42 P.M.
21 END TIME: 2:55 P.M.
22
23
24 REPORTED BY: BARBARA J. SCOVILLE, CCR, RPR
25 CCR NO. 2124

1 I N D E X
2 In re: SARAH BRADBURN vs. NORTH CENTRAL REGIONAL LIBRARY
3 Case No.: CV-06-327-EFS
4 Date: August 13th, 2007
5
6
7 T E S T I M O N Y
8 EXAMINATION PAGE NUMBER
9 By Mr. Adams 4
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20 ALSO PRESENT: MR. DEAN MARNEY
21 MR. DAN HOWARD
22
23
24
25

1 BE IT REMEMBERED that on Monday,
2 August 13th, 2007, at 1:42 p.m., at Omak Library,
3 30 South Ash, Omak, Washington, the testimony of
4 **MRS. SARAH MARIA BRADBURN** was taken before Barbara
5 J. Scoville, Certified Court Reporter and Notary
6 Public. The following proceedings took place:
7
8 **SARAH M. BRADBURN**, being first duly sworn to
9 tell the truth, the whole
10 truth and nothing but the
11 truth, testified as
12 follows:
13
14 EXAMINATION
15 BY MR. ADAMS:
16 Q. Would you state your full name, please.
17 A. **Sarah Maria Bradburn.**
18 Q. Okay. Mrs. Bradburn or Ms. Bradburn?
19 A. **Mrs.**
20 Q. Mrs. Bradburn, my name is Tom Adams, and we had a
21 chance to meet just a moment ago. And I'm the
22 lawyer that's representing North Central Regional
23 Library District in this lawsuit that has been
24 brought by you and others here in Federal Court for
25 the State of Washington. And we're here today to

1 marked previously in another deposition. This is
 2 Deposition Exhibit 6. Tell me if that letter looks
 3 familiar to you, Mrs. Bradburn.
 4 **A. I don't remember this letter in particular. I would
 doubt that I saw this letter.**
 5 Q. Why is that?
 6 **A. It's dated October 31st, 2000. I met my husband in
 7 November 4th of 2000, and he is actually probably
 8 the only one as -- listed as an ACLU member. I
 9 don't know that I am. I may be.**
 10 Q. Okay.
 11 **A. But that was previous to my husband, and I wasn't
 12 getting letters from the ACLU at that time.**
 13 Q. Okay. But you do remember seeing letters addressed
 14 to you from ACLU?
 15 **A. My husband received a card --**
 16 Q. Okay.
 17 **A. -- and I responded to that.**
 18 Q. Okay. Is your membership in ACLU -- Well, I guess
 19 I'm a little confused. Are you a member or is your
 20 husband a member or do you know?
 21 **A. I really don't know.**
 22 Q. Okay.
 23 **A. We get mail and some of it is addressed to both of
 24 us and some is just addressed to him and some, you**
 25

know, obviously just to me.
 2 Q. Okay.
 3 **A. I consider myself part of the ACLU as his wife. I
 4 mean, I support the ACLU.**
 5 Q. Uh-huh.
 6 **A. Did I sign a card to say I'm an ACLU card-carrying
 7 member? I don't know. I probably didn't.**
 8 Q. I bet you could at any time if you wanted. How did
 9 you become involved in this lawsuit?
 10 **A. My husband received a card in the mail. It was a
 11 little postcard. It was not that letter. It was a
 12 little postcard that said, "Have you ever had any
 13 trouble with the filters on the library?"
 14 And he said, "I haven't. Have you?"
 15 And I said, "You know, I think I have."
 16 And I filled it out and here we are.**
 17 Q. Okay. When did those postcards come around to the
 18 best of your knowledge?
 19 **A. That's what I was saying. I think it was 2004 or
 20 five.**
 21 Q. Okay. All right.
 22 **A. It just -- My head for dates, specific dates and
 23 times, is a little fuzzy. I'm sorry, but I don't
 24 carry one of those little date calculators around in
 25 my head, and time flows quickly.**

1 Q. It all blurs together. Do you belong to any other
 2 organizations besides ACLU?
 3 **A. I'm a member of Alcoholics Anonymous.**
 4 Q. Okay. Anything else?
 5 **A. I have a membership to the gun club in Republic.**
 6 Q. Okay. Are you a member of the Second Amendment
 7 Foundation?
 8 **A. No, I'm not.**
 9 Q. Okay. Are you familiar with Pearl Cherrington?
 10 **A. No.**
 11 Q. Charles Heinlen?
 12 **A. I vaguely recognize the names. But, no, I don't
 13 know them.**
 14 Q. Okay. You mentioned a moment ago your husband
 15 showed you the postcard. And you indicated in
 16 response or as part of a conversation with him that,
 17 yeah, you had had "a problem," quote unquote, with
 18 the Internet filtering at the NCRL branch in
 19 Republic; is that right?
 20 **A. Uh-huh.**
 21 Q. Is that "yes"?
 22 **A. Yes. Oh, sorry. Yes.**
 23 Q. Okay. Tell me about that. What specifically did
 24 you encounter that you characterize as "a problem"?
 25 **A. When I was a student for the year that I went to**

**Eastern, I commuted. I went to Eastern for the week
 and commuted back to Republic on weekends. So some
 of the assignments that I had, it was important for
 me to do as much as I could over the weekend as well
 as during the week. I went to the library to find
 the research I needed on a particular paper. It was
 a prevention class on teenage use of tobacco. And I
 typed in "tobacco use by teenagers" or "teenage use
 of" -- you know, "teenage tobacco use" or
 "adolescent tobacco use," some particular form of
 those words or maybe many of those and got nothing.
 And I -- I didn't have enough computer savvy to know
 why I got nothing. I didn't know that the Internet
 was the same here as there, so I just concluded that
 I couldn't do my work in Republic. And when I went
 back to Spokane during the week, I went to the
 Spokane library and got oodles of information.**
 18 Q. Typing in the same search?
 19 **A. Yes.**
 20 Q. Exactly the same search?
 21 **A. Yes.**
 22 Q. When you say you "got nothing," what do you mean?
 23 **A. No articles. Nothing came up. I got nothing.**
 24 Q. What showed on the screen?
 25 **A. I don't recall.**

1 Q. Did anything pop up indicating to you that you were
 2 being blocked?
 3 A. **Not that I recall. I just really had no idea why I**
 4 **got no information. I thought it a little odd, but**
 5 **I just waited until I went to Spokane and did the**
 6 **research there.**
 7 **And it didn't -- it didn't ever -- you know, I**
 8 **didn't dwell on that. I didn't think about that at**
 9 **all until this card came, and I went -- then it kind**
 10 **of connected in my head, "Oh, that's why I got no**
 11 **information."**
 12 Q. But you don't recall seeing anything indicating that
 13 the sites that you were attempting to access were
 14 blocked or --
 15 A. **I don't recall that, no.**
 16 Q. Okay. You're talking about a search that you may
 17 have entered on Google or some other search
 18 engine -- is that right? -- or a particular Web site
 19 address?
 20 A. **No particular Web site address. I didn't have one.**
 21 Q. Okay. You were just doing a search.
 22 A. **A search.**
 23 Q. Okay. Did you ask the librarian at the Republic
 24 branch about what you were encountering?
 25 A. **No, I didn't.**

21

Q. Okay. Did you think -- did you think about doing
 2 that, or did you just not think about it?
 3 A. **No, I just didn't do it.**
 4 Q. Okay.
 5 A. **I didn't think about doing it, and I -- it never**
 6 **occurred to me.**
 7 Q. Okay. Are we talking about a single occasion when
 8 this occurred?
 9 A. **Yes.**
 10 Q. Okay. Apart from that, have you ever had any other
 11 instance of not being able to get from the Internet
 12 what you thought you should be able to get at the
 13 Republic branch?
 14 A. **No.**
 15 Q. Okay. Have you been to other branches within the
 16 NCRL system?
 17 A. **Ever?**
 18 Q. Uh-huh.
 19 A. **Yes.**
 20 Q. To use the Internet, I mean.
 21 A. **Probably not.**
 Q. Okay. So your experience with the Internet, the
 23 NCRL's Internet services, have been at the Republic
 24 branch.
 25 A. **Correct.**

22

1 Q. Are you familiar with the NCRL Internet Use Policy?
 2 A. **Not specifically.**
 3 Q. Let me show you a document that we have marked in a
 4 previous deposition as Exhibit 3. Take a look at
 5 that, Mrs. Bradburn, and let me know when you've had
 6 a chance to review it generally.
 7 A. **Okay.**
 8 Q. Have you seen this document before?
 9 A. **I believe it might be posted at our library.**
 10 Q. Okay. In Republic?
 11 A. **Uh-huh.**
 12 Q. And you think you might have seen it near the
 13 computer terminal or somewhere in the library?
 14 A. **Somewhere in the library.**
 15 Q. Okay. So you've read this before today.
 16 A. **I think I have.**
 17 Q. Okay. Is it fair to say that you were aware that
 18 the Internet was being filtered when you sat down to
 19 use it?
 20 A. **I think I understood that, but I didn't understand**
 21 **the extent of it.**
 22 Q. When you sit down at a terminal and you log on, are
 23 there screens that you have to go through?
 24 A. **Yes.**
 25 Q. What do those screens say? What do they tell you or

23

ask of you? Do you have to enter information, who
 2 you are or your password or anything like that?
 3 A. **Yes. I think you have to enter the last four digits**
 4 **of your phone number.**
 5 Q. Okay. Are there any other statements or permissions
 6 that you have to accept or agree to, to proceed?
 7 A. **Gosh, I don't remember.**
 8 Q. You just kind of click through them and off you go?
 9 A. **Yes, I guess.**
 10 Q. Okay. Are you aware of NCRL's procedures,
 11 mechanisms, that a patron is free to invoke if the
 12 patron runs across a Web site that is blocked
 13 because of the Internet policy?
 14 A. **I've heard that you can fill out a request card now**
 15 **requesting that you be allowed access to a site.**
 16 Q. Okay. Have you ever taken that step?
 17 A. **No.**
 18 Q. Okay. Have you ever seen the form that you're
 19 describing?
 20 A. **No.**
 21 Q. Let me show you a document that we marked in an
 22 earlier deposition that as Exhibit Number 2. Take a
 23 look at that if you would, please.
 24 A. **Okay.**
 25 Q. So have you seen a document similar to Exhibit 2

24

1 before?

2 **A. No.**

3 **Q.** And you've never filled one out?

4 **A. No.**

5 **Q.** You've spoken to the one experience about trying to

6 gain access to "teenage tobacco use" and such

7 topics, and I appreciate that testimony. If you

8 were to go to the Republic branch this afternoon or

9 tomorrow and search for something and find a Web

10 site that was blocked that you wanted access to,

11 would you find it burdensome to complete a form like

12 Exhibit 2 to try to gain access?

13 **A. I think I wouldn't -- I wouldn't know what to put.**

14 **I wouldn't have a specific site. I would be, you**

15 **know -- like I was for that paper, I was searching a**

16 **general topic. I didn't have a specific Web site in**

17 **mind. I had no clue.**

18 **Q.** Okay.

19 **A. So, yes, I would find it pretty burdensome.**

20 **Q.** You couldn't proceed --

21 **A. No.**

22 **Q.** -- in that instance, could you?

23 **A. No.**

24 **Q.** Okay. What if you did a search and a Web site

25 looked interesting to you but you couldn't access it

25

1 because of the Internet policy? Could you then take

2 that Web address and put it on this form?

3 **A. I guess I could.**

4 **Q.** If you had that information.

5 **A. I would -- I think I would prefer if the librarian**

6 **could just release that at the time but not go**

7 **through this kind of procedure.**

8 **Q.** Okay. Do you know what happens when a form like

9 this is filled out and given to a librarian?

10 **A. It goes to the main branch and they research it and**

11 **send it back and --**

12 **Q.** Do you know how long all that takes?

13 **A. It sounds like a while.**

14 **Q.** Do you know that for a fact?

15 **A. I don't.**

16 **Q.** Okay.

17 **A. But I know it's not going to be right now.**

18 **Q.** Okay. What would be a reasonable time to get a

19 response?

20 **A. I suppose it depends on what you're doing. The**

21 **paper I was doing was due the next week, so no kind**

22 **of timeline except right then would have been**

23 **appropriate.**

24 **Q.** Uh-huh. If you were trying to obtain a book that

25 was unavailable at the Republic branch but might be

26

1 available at the Twisp branch by inter-library loan,

2 would it be reasonable for you to wait a couple days

3 to get that book? Would you expect a book to be

4 delivered along that kind of timeline?

5 **A. Yes.**

6 **Q.** Okay. Not within hours though.

7 **A. No.**

8 **Q.** Okay. What other resources do you use at the

9 Republic branch besides the Internet?

10 **A. I check out books, I check out the DVDs, videos.**

11 **Q.** Okay. What would you say is your primary use of the

12 library's resources if there is a primary use?

13 **A. Probably the books.**

14 **Q.** How often do you check out books?

15 **A. Oh, gosh, it goes in spurts, but there are periods**

16 **where I check out books weekly.**

17 **Q.** Okay. How often do you use the Internet?

18 **A. At the library?**

19 **Q.** Yes.

20 **A. The Internet at the library, I don't use very often.**

21 **Q.** Okay. Where else do you go to access the Internet?

22 **A. I was able to access it at work but no longer, so**

23 **I'll probably be back to the library. But I would**

24 **say once a month maybe.**

25 **Q.** Before your job ended at Ferry County?

27

1 **A. Correct.**

2 **Q.** Okay. Are there any other Internet access points in

3 Republic besides the library?

4 **A. There is a computer center.**

5 **Q.** Okay. Is that a fee-based access point?

6 **A. Yes, it's a donation.**

7 **Q.** Do you use that from time to time?

8 **A. About once a year.**

9 **Q.** Okay. Do you know whether you are accepting the

10 NCRL Internet Usage Policy as a condition of your

11 accessing the computer terminals? That's a poor

12 question. Do you know whether or not by -- you must

13 accept the NCRL Internet Usage Policy in order to

14 proceed further toward using the Internet when you

15 sit down at a terminal? That's not much better, is

16 it.

17 **A. I'm sorry.**

18 **Q.** No, no, it's not you. It's probably me. Do you

19 understand what I'm getting at? The Internet Usage

20 Policy that NCRL has, do you know whether or not you

21 have to accept that in order to use the Internet?

22 MR. MANVILLE: Object to the form.

23 You can answer that.

24 THE WITNESS: Pardon me?

25 MR. MANVILLE: I'm just making an

28

1 objection for the record.
 2 THE WITNESS: And I'm still unclear about
 3 the question. I'm sorry.
 4 Q. (By Mr. Adams) That's okay. Do you know whether or
 5 not the NCRL requires its patrons to agree to and
 6 accept the Internet Usage Policy before the patrons
 7 are permitted to use the NCRL computers?
 8 A. Oh, I would -- I would think so.
 9 Q. Okay. So do you believe that you have, in fact,
 10 accepted the policy and agreed to the policy before
 11 using NCRL's computers?
 12 MR. MANVILLE: Object to the form.
 13 THE WITNESS: I think -- I'm not exactly
 14 sure how to answer that. I don't -- I think I
 15 agree with it to some degree but not entirely that
 16 it's -- that it's necessarily the way it should be
 17 or necessarily the way it needs to be in place at
 18 this time.
 19 Q. (By Mr. Adams) Okay. What would you change about
 20 it?
 21 A. Well, I think -- like this form, I think I would
 22 want to have some kind of ability to go to the
 23 librarian to be able to say, "Look, I'm looking for
 24 information on this topic; and can you unlock the
 25 filter?" or have access at that time not, you know,

however long that procedure takes.
 2 Q. Okay. Do you think it's appropriate for NCRL to
 3 filter for some subjects?
 4 MR. MANVILLE: Object to the form.
 5 THE WITNESS: For adults?
 6 Q. (By Mr. Adams) Yeah.
 7 A. I guess I don't know specifically what you have in
 8 mind.
 9 Q. Well, let's just choose, say, pornography. Do you
 10 think it's appropriate for NCRL to screen out
 11 Web sites that deal with pornography?
 12 A. I don't have any problem with that.
 13 Q. With that kind of screening --
 14 A. Correct.
 15 Q. -- that type of filtering?
 16 A. Correct.
 17 Q. Okay. So filtering for that purpose is all right
 18 from your standpoint.
 19 A. I don't have a problem with that. I don't -- I
 20 certainly don't want children to be able to access
 21 whatever they want to access in that regards.
 22 Q. Okay. So filtering for children in particular
 23 doesn't create an issue for you.
 24 A. No, it doesn't.
 25 Q. Okay. Let's focus on adults for a second. Do you

1 have any particular objection to NCRL's filtering
 2 Web content, Internet-based content, that deals with
 3 pornographic topics?
 4 A. For an adult, I don't know. But I know the library
 5 isn't a place that's private. So in that sense, I
 6 don't have a problem with them filtering that even
 7 for adults.
 8 Q. Okay. What about other illegal activity? Let's say
 9 online gambling or let's say Web sites that promote
 10 hacking or the proliferation of spyware, things that
 11 are against the law, do you think it's appropriate
 12 for NCRL to filter Web-based content deriving from
 13 sites that promote illegal activity?
 14 A. I don't think I have a problem with that either.
 15 Q. Okay. So for some subjects such as we're talking
 16 about -- illegal activity, pornography -- Internet
 17 filtering doesn't trouble you.
 18 A. No.
 19 Q. As a conceptual matter or in the way that NCRL is
 20 doing it; is that correct?
 21 A. Correct.
 22 MR. MANVILLE: Object to the form.
 23 Q. (By Mr. Adams) You can answer.
 24 A. Correct.
 25 MR. MANVILLE: It's also subject to lack

1 of foundation.
 2 Q. (By Mr. Adams) What do you know about the -- if
 3 anything, about the filtering software and filtering
 4 service employed today by the NCRL?
 5 A. I don't have any idea.
 6 Q. Okay. Have you heard the brand name Fortinet,
 7 F-o-r-t-i-n-e-t?
 8 A. I saw it today.
 9 Q. Okay. In what context?
 10 A. On the computer.
 11 Q. Okay. Tell me what you saw.
 12 A. Just saw that name.
 13 Q. "Filtering by Fortinet" or something?
 14 A. (Witness nodding her head)
 15 Q. Is that a "yes"?
 16 A. Yes.
 17 Q. Okay. Do you know anything about the Fortinet
 18 service?
 19 A. No idea.
 20 Q. Okay. Do you know what categories of information or
 21 types of content NCRL does filter for now?
 22 A. No.
 23 Q. Okay. Same question as to the previous software
 24 that NCRL had in place, something called "Bess,"
 25 B-e-s-s, do you know anything about that type of

1 software?
 2 **A. No.**
 3 **Q.** Okay. Or what categories were filtered by NCRL
 4 using that software?
 5 **A. No.**
 6 **Q.** Do you know anything about how Fortinet classifies
 7 particular Web sites within certain topical areas or
 8 other topical areas?
 9 **A. No.**
 10 **Q.** Okay. Having been a substitute librarian for a time
 11 in Republic, do you have a thought about how
 12 libraries -- how NCRL goes about making
 13 content-based decisions in determining what is in or
 14 not in its collections?
 15 **A. No, I don't.**
 16 **Q.** Have you ever -- Were you ever a part of any
 17 collection decisions?
 18 **A. No.**
 19 **Q.** Okay. Are you familiar with NCRL's mission
 20 statement, Mrs. Bradburn?
 21 **A. Off the top of my head, no.**
 22 **Q.** Let me show you a document that we've marked
 23 previously as Exhibit 4. You're free to look at it
 24 in its entirety, but I'm really only interested in
 25 asking you a question or two about the mission

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statement that's articulated in the first paragraph.
 2 **A. I think it was reiterated also on your second**
 3 **document.**
 4 **Q.** Okay. The Internet Usage Policy?
 5 **A. Yes.**
 6 **Q.** Okay. So the mission statement as articulated by
 7 NCRL is "to promote reading and lifelong learning."
 8 Correct?
 9 **A. Uh-huh.**
 10 **Q.** Okay. Is that "yes"?
 11 **A. Yes, sorry.**
 12 **Q.** Okay. And is that in your view as a former
 13 substitute librarian an appropriate encapsulation of
 14 NCRL's mission?
 15 **A. Yes.**
 16 **Q.** And is NCRL's further stated goal of "creating a
 17 safe place for children to come and learn" an
 18 appropriate objective for the library to strive for?
 19 **A. Yes.**
 20 **Q.** Okay. Would you agree that the library exists to
 21 serve the needs of all its patrons of any age?
 22 **A. Yes.**
 23 **Q.** Okay. Young kids and adults alike?
 24 **A. Yes.**
 25 **Q.** Okay. Would you also agree that in serving the

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1 diverse needs of the patrons the library has to
 2 balance what is necessary and appropriate for the
 3 needs of one group versus the other?
 4 **A. Yes.**
 5 **Q.** It's all about balance, isn't it?
 6 **A. Yes.**
 7 **Q.** Now, in your Complaint, Mrs. Bradburn, the central
 8 tenant of the complaint seems to be that you and the
 9 other plaintiffs are disputing the NCRL's policy of
 10 not disabling the Internet filter upon the request
 11 of an adult patron; is that right?
 12 **A. Yes.**
 13 **Q.** Okay. But you do agree, as you just testified, that
 14 filtering in some instances is appropriate; is that
 15 correct?
 16 **A. Yes.**
 17 **Q.** Okay. So is it reasonable in your view for NCRL to
 18 balance those things, those thoughts, by undertaking
 19 a site-by-site review of a blocked Web site when
 20 that occurs in the course of a patron's use of the
 21 Internet?
 22 **MR. MANVILLE:** Object to the form.
 23 **THE WITNESS:** I didn't really follow that
 24 completely.
 25 **Q.** (By Mr. Adams) Okay, sure. Well, your Complaint

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1 states NCRL's got a policy of not disabling the
 2 Internet filter entirely when an adult requests that
 3 occur. Yet you've also testified that you believe
 4 it is appropriate to maintain a filter for some
 5 topics, some categories of information -- illegal
 6 activity, pornography, spyware. We talked about
 7 some things; right?
 8 **A. Yes.**
 9 **Q.** Okay. So with those thoughts in mind, do you think
 10 that it's an appropriate compromise, in addition to
 11 that, the goal of furthering the interests of
 12 children and adults alike? So with all of those
 13 goals in mind and thoughts in mind, is it
 14 appropriate in your view for the NCRL to say, "You
 15 know what? We'll leave this Internet filter in
 16 place; and if an adult patron runs into a block,
 17 we'll undertake a site-by-site review and maybe
 18 unblock it"?
 19 **MR. MANVILLE:** Object to the form.
 20 **THE WITNESS:** I can see how that could
 21 work in some instances but not in others.
 22 **Q.** (By Mr. Adams) Okay. Give me an example of an
 23 instance where it would not work.
 24 **A. For instance, in writing my paper that was due that**
 25 **week and I was only home for two days Saturday and**

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1 **Sunday and then returning to Spokane on Monday,**
 2 **there wasn't time to on Saturday fill out a form and**
 3 **have that information back before I had to go, you**
 4 **know, commute.**
 Q. Uh-huh. Would you feel differently if you had
 undertaken your research for your school paper two
 weeks ahead of time or three weeks? I mean, it's
 your need that makes the policy unworkable; is that
 correct?
 A. **Yes, but I don't know that I always had that**
information that far in advance.
 Q. Okay. By analogy if you were working at the library
 on a term paper and you had no computer access and
 the book that you needed to complete your term paper
 was in Twisp, would you blame the library if the
 library couldn't get it to you before your term
 paper deadline?
 A. **No.**
 Q. Okay.
 MR. DEAN MARNEY: Tom, can we take a
 break so I can ask you a question?
 MR. ADAMS: Sure, let's take a little
 break.
 (A BRIEF RECESS WAS TAKEN.)

MR. ADAMS: Why don't we go ahead and
 mark this.
 (EXHIBIT 14 WAS MARKED AND
 EXHIBIT 15 WAS MARKED.)
 Q. (By Mr. Adams) Mrs. Bradburn, I've handed you a
 document that we've marked as Deposition Exhibit 15,
 and it constitutes -- it's a multi-page document
 consisting of your "Objections, Answers and
 Responses to Interrogatories and Requests for
 Production." I suspect you've had a chance to
 review this earlier in the afternoon, but feel free
 to take another look through it if you would like.
 A. **Yes.**
 Q. Is that your signature on page 11?
 A. **Yes.**
 Q. In your answer to Interrogatory Number 5 on page 4
 and extending on to the top of page 5, I'm a little
 confused by that. In the third sentence, I believe,
 you write, "The computer responded that no links
 were accessible for these queries." Do you see
 that?
 A. **Yes.**
 Q. Now, I understood from your testimony earlier that

1 you don't recall getting any response at all. Did I
 2 understand that right?
 3 **A. Yes.**
 4 **Q.** So there wasn't an affirmative response, was there,
 5 saying, "No links are accessible"?
 6 **A. I don't -- I don't recall what came up.**
 7 **Q.** Was it a blank screen?
 8 **A. There was no information. The information I was**
 9 **trying to find, you know, I don't remember whether**
 10 **it said it was "Filtered," whether it said, "There**
 11 **is no information, no matches, to your search." I**
 12 **don't remember specifically what happened, but I got**
 13 **no information.**
 14 **Q.** Is it possible that the screen went blank because of
 15 a technical difficulty?
 16 **A. I have -- I haven't any idea.**
 17 **Q.** Okay. Do you recall whether the screen was blank?
 18 **A. No.**
 19 **Q.** You just don't recall.
 20 **A. I don't.**
 21 **Q.** It sounds like you packed up and went to Spokane at
 22 that point --
 23 **A. Yes.**
 24 **Q.** -- not literally but figuratively.
 25 **A. Yes.**

1 **Q.** Now, Interrogatory Number 11 on page 6 asks whether
 2 you have accessed or attempted to access the
 3 Internet since the Complaint was filed at an NCRL
 4 branch. And you have amended your answer to say
 5 "yes"; is that right?
 6 **A. Yes.**
 7 **Q.** Okay. And then in Number 12, you say you don't
 8 remember the specific Web sites for which you claim
 9 access was denied; is that correct?
 10 **A. Yes.**
 11 **Q.** Okay. Are you sure that access was denied?
 12 **A. No.**
 13 **Q.** Okay. Tell me about that a little bit. I
 14 understand that you don't recall the specific
 15 Web sites that you were trying to enter. Or perhaps
 16 this was an Internet query. Which was it?
 17 **A. This was similar to the work that I did when I was**
 18 **in school. I just went back and did the same kind**
 19 **of search, "adolescent tobacco use." And I did**
 20 **receive some information. At that point, I would**
 21 **have been able to do my research.**
 22 **Q.** Okay. We're talking now about the occasion after
 23 the Complaint was filed.
 24 **A. Yes.**
 25 **Q.** Okay. And on that occasion, you, again, went to a

1 search engine. Was it Google?
 2 **A. I believe it was.**
 3 **Q.** Okay. So you went to Google and you entered some
 4 terms --
 5 **A. Yes.**
 6 **Q.** -- and you clicked "Search."
 7 **A. Yes.**
 8 **Q.** And what happened?
 9 **A. There were Web sites.**
 10 **Q.** Okay. So you got a positive response to your
 11 search.
 12 **A. Yes.**
 13 **Q.** Okay. And did you click on the links?
 14 **A. Yes.**
 15 **Q.** And what happened?
 16 **A. Information.**
 17 **Q.** You got the information.
 18 **A. Yes.**
 19 **Q.** So you weren't blocked at all.
 20 **A. Not then.**
 21 **Q.** Okay. I guess I was a little confused because the
 22 question -- the predicate of this area of inquiry in
 23 Interrogatory 12 is, "Identify Web sites for which
 24 you claim access was denied." But, in fact, access
 25 was not denied.

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1 **Q.** Okay.
 2 **A. But I entered words and nothing happened, nothing**
 3 **came up, no information.**
 4 **Q.** And you don't remember what was on the screen in
 5 front of you.
 6 **A. I don't.**
 7 **Q.** That's fine. What school district did you work in
 8 as a substitute school teacher?
 9 **A. Omak, Tonasket, Republic. I don't think I ever made**
 10 **it to Oroville.**
 11 **Q.** Okay. What period of time are we talking about?
 12 **A. '91 to 2001.**
 13 **Q.** Okay. Toward the end of that period, were you
 14 teaching in schools that offered Internet access to
 15 students?
 16 **A. Yes.**
 17 **Q.** Okay. Do you know whether or not Internet access to
 18 students was filtered?
 19 **A. I don't really know.**
 20 **Q.** Okay. Did teachers themselves have access to school
 21 computers with Internet access during that period of
 22 time? As a substitute teacher, could you sit down
 23 at a terminal and use it if you wanted to?
 24 **A. I don't recall that. I don't.**
 25 **Q.** You never did it, it sounds like.

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A. Right. Sorry.
 2 **Q.** That's okay. No, no, I just wanted to be clear.
 3 **MR. MANVILLE:** Tom, let me jump in. I
 4 think that the amended answer there was referring to
 5 the denial of access on the prior occasion, and
 6 probably this should have just stayed "NA" given
 7 that this Interrogatory 12 was referring back to
 8 Interrogatory Number 11 if that's helpful --
 9 **THE WITNESS:** Okay.
 10 **MR. MANVILLE:** -- although Interrogatory
 11 Number 12 is a bit vague in that it says, "Identify
 12 all Web sites for which you claim access was
 13 denied." And she doesn't remember the specific
 14 Web sites for which access was denied prior to the
 15 filing of the lawsuit.
 16 **MR. ADAMS:** Prior to the filing of the
 17 Complaint.
 18 **MR. MANVILLE:** Subsequent to the filing
 19 of the Complaint, I don't think she has been denied
 20 access as far as she knows.
 21 **Q.** (By Mr. Adams) Okay. And prior to the Complaint,
 22 you entered some search terms, probably in Google --
 23 right? -- and that's all you remember.
 24 **A. Yeah. I don't remember that it was Google. I**
 25 **really don't.**

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1 **A. I don't think so.**
 2 **Q.** You don't recall that.
 3 **A. I don't recall it.**
 4 **MR. ADAMS:** Okay. Let's take a quick
 5 break.
 6
 7 (A BRIEF RECESS WAS TAKEN.)
 8
 9 **MR. ADAMS:** Thank you very much. We're
 10 all done.
 11 **THE WITNESS:** Thanks.
 12 **MR. ADAMS:** You will have an opportunity
 13 to review the transcript once it's been completed.
 14 And your attorney, Mr. Manville, will make that
 15 available to you, or it may come directly from the
 16 court reporter come to think of it. And you'll have
 17 an opportunity to review the transcript. And if you
 18 think errors have been made in the transcription of
 19 your testimony, you can indicate that on an errata
 20 sheet that is attached to the back. We don't change
 21 "yes" to "no" or anything else. Her recording is
 22 what becomes the official record, but you can amend
 23 that with your own errata sheet if you think that's
 24 appropriate.
 25 **THE WITNESS:** Okay. All right.

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1 MR. ADAMS: Very good.
 2 THE WITNESS: Thanks.
 3
 4 (DEPOSITION CONCLUDED AT 2:55 P.M.)
 (SIGNATURE RESERVED)
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IN RE: SARAH BRADBURN vs. NORTH CENTRAL REGIONAL LIBRARY NO. CV-06-327-EFS

2
 3 CORRECTION SHEET
 4 CHANGES IN FORM AND SUBSTANCE REQUESTED BE MADE IN THE
 FOREGOING ORAL EXAMINATION TRANSCRIPT:
 5
 6 PAGE LINE CORRECTION AND REASON
 7
 8
 9
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 15
 16
 17 I hereby certify that this is a true and correct copy of my
 testimony, with the exception of the corrections noted above.
 18
 19 **SARAH MARIA BRADBURN**
 Date _____
 20
 21 Notary Public in and for the state
 of Washington residing at _____
 Subscribed and sworn to before me on
 this ____ day of _____, 2007.
 My commission expires on _____.
 22
 23
 24 See: Wash. Reports 34A, Rule 30 (e)
 25 USCA 28, Rule 30 (e)

1 CERTIFICATE
 2 STATE OF WASHINGTON)
 3 COUNTY OF CHELAN) ss.
 4
 5 THIS IS TO CERTIFY that I, Barbara J. Scoville,
 6 Notary Public in and for the State of Washington, residing
 7 at Entiat, reported the within and foregoing testimony; said
 8 testimony being taken before me as a Notary Public on the
 9 date herein set forth; that the witness was first by me duly
 10 sworn; that said examination was taken by me in shorthand
 11 and thereafter under my supervision transcribed, and that
 12 same is a full, true and correct record of the testimony of
 13 said witness, including all questions, answers and
 14 objections, if any, of counsel, to the best of my ability.
 15 I further certify that I am not a relative, employee,
 16 attorney, counsel of any of the parties; nor am I
 17 financially interested in the outcome of the cause.
 18 Transcribed notes will be destroyed three years from
 19 the affixed date unless requested by counsel to retain them.
 20 IN WITNESS WHEREOF, I have hereunto set my hand and
 21 affixed my official seal this _____ day of
 22 _____, 2007.
 23
 24 Barbara J. Scoville, CCR, RPR
 CCR NO. 2124
 25