

Exhibit C

1
 2 UNITED STATES DISTRICT COURT
 3 EASTERN DISTRICT OF WASHINGTON
 4 AT SPOKANE
 5

6 SARAH BRADBURN, PEARL CHERRINGTON,)
 CHARLES HEINLEN, and THE SECOND)
 7 AMENDMENT FOUNDATION,)

8 Plaintiffs,)

9 vs.)

10 NORTH CENTRAL REGIONAL LIBRARY)
 DISTRICT,)

11 Defendant.)

13 DEPOSITION UPON ORAL EXAMINATION OF
 14 PEARL ANNE CHERRINGTON

15
 16 TAKEN ON: Monday, August 13th, 2007

17 TAKEN AT: Omak Library
 30 South Ash
 18 Omak, Washington

19 START TIME: 10:42 A.M.

20 END TIME: 11:58 A.M.

21
 22
 23
 24
 25 REPORTED BY: BARBARA J. SCOVILLE, CCR, RPR
 CCR NO. 2124

1 the Twisp library branch consists of? I'm sure
 2 you've never paced it off.
 3 **A. Perhaps twice the size of this room.**
 4 **Q.** Okay. Maybe a thousand square feet? Does that
 sound about right?
 5 **A. Yeah, yes.**
 6 **Q.** Does that branch have computer terminals?
 7 **A. Yes.**
 8 **Q.** Okay. How many?
 9 **A. As of Saturday when I went in, three.**
 10 **Q.** Okay.
 11 **A. It only had one up until that time.**
 12 **Q.** Oh, and as of Saturday, they've tripled their --
 13 **A. Yes, they have.**
 14 **Q.** Excellent. Are they all situated in the same area?
 15 **A. No. There's two in a section and then there is one**
 16 **in another section.**
 17 **Q.** Do you have any idea why they're separated?
 18 **A. I think they're separated because we have a card**
 19 **catalog -- We used to have one designated for the**
 20 **card catalog only. It was not Internet. And now**
 21 **this -- they're all Internet access. Plus our card**
 22 **catalog, that's how we have to access our card**
 23 **catalog. I think that one's been sort of set aside**
 24 **so it's not continually used so that we can get**
 25

17

access to look up books.

1 **Q.** Okay.
 2 **A. That's what I'm thinking.**
 3 **Q.** When you say "we," just patrons in general?
 4 **A. Yes, patrons.**
 5 **Q.** Okay. Do you know the library staff at the Twisp
 6 branch?
 7 **A. Yes, I do.**
 8 **Q.** Who is that?
 9 **A. The main librarian is Terry Dixon. Then there's a**
 10 **woman that fills in on Saturdays. I only know her**
 11 **first name. It's Rosie. And then she's added some**
 12 **new staff, and I'm unsure of what their names are.**
 13 **Q.** Okay. Now, when you visit the Twisp branch,
 14 Mrs. Cherrington, what resources do you typically
 15 use?
 16 **A. I look for books mainly.**
 17 **Q.** And, of course, you use the Internet from time to
 18 time; is that right?
 19 **A. We got our own computer two years ago. So I did**
 20 **actually use the Internet Saturday at the library,**
 21 **but it is mainly to look up books actually.**
 22 **Q.** The card catalog?
 23 **A. Yes, yes.**
 24 **Q.** Okay. So you have your own computer at home?
 25

18

1 **A. Not at home. It's in my husband's office in Twisp.**
 2 **Q.** I see. And are you able to use that computer as you
 3 need to more or less?
 4 **A. Occasionally. We mainly keep it for business. I**
 5 **do -- If I need to get on it to look for**
 6 **information, I will use that over the library's now.**
 7 **Q.** Okay. And that computer has Internet access, of
 8 course.
 9 **A. Yes, it does.**
 10 **Q.** And I don't mean to put words in your mouth. Is
 11 that your preferred point of access to the Internet
 12 now?
 13 **A. Yes.**
 14 **Q.** And is that computer completely unfiltered?
 15 **A. Yes.**
 16 **Q.** So your access is not impeded in any way?
 17 **A. No, it's not.**
 18 **Q.** And when you come to the Twisp branch to use the
 19 Internet now, as I understand it, your usage is
 20 primarily directed toward looking up books.
 21 **A. Right.**
 22 **Q.** Okay. Do you even have to go on the Internet for
 23 that purpose or is that internal?
 24 **A. Actually, no, I don't have to go on the Internet for**
 25 **that; right.**

19

1 **Q.** Am I correct then in thinking that you today rarely
 2 access the Internet through the Twisp branch
 3 computers?
 4 **A. Yes.**
 5 **Q.** Okay. Have you ever tried to access the Internet
 6 through a library computer and been blocked from
 7 reaching a site you desired to go to?
 8 **A. Yes.**
 9 **Q.** When did that occur?
 10 **A. About 2005.**
 11 **Q.** Okay. Do you have a specific recollection of that
 12 incident?
 13 **A. I have a -- Yes, I do. I went -- plugged in my**
 14 **Web site for an art gallery that I was looking for**
 15 **in Idaho and a "STOP" sign came up and I was**
 16 **surprised to see that.**
 17 **Q.** Do you recall the Web site?
 18 **A. I don't recall the Web site.**
 19 **Q.** Okay. What did the pop-up, if you will, inform you
 20 of?
 21 **A. It said, "STOP." And I don't remember exactly what**
 22 **else was said there, what -- why it was stopping.**
 23 **That's when I got up and asked the librarian why**
 24 **that was showing, why I couldn't get into that site.**
 25 **Q.** Was that Terry?

20

1 **A. Yes, it was.**
 2 **Q.** Okay. And what did Terry say?
 3 **A. And Terry said that she was unable to -- that it was**
 4 **filtered and that she was unable to unlock it.**
 5 **Q.** Okay. Did you recall having a discussion with Terry
 6 about a mechanism for taking it up a chain, if you
 7 will, and seeing about unblocking access to that
 8 site?
 9 **A. I don't recall doing that at the time.**
 10 **Q.** You don't recall a discussion about that?
 11 **A. No, I don't.**
 12 **Q.** Okay. Did you attempt to reach that same Web site
 13 address through another computer unaffiliated with
 14 the library?
 15 **A. No, I didn't.**
 16 **Q.** You didn't have one at your husband's business then?
 17 **A. Right.**
 18 **Q.** Okay. Are you familiar with NCRL's Internet Public
 19 Use Policy?
 20 **A. No, I'm not.**
 21 **Q.** Have you ever seen anything in printed form or heard
 22 anybody discuss what the parameters of the Internet
 23 Public Use Policy might be?
 24 **A. I just remember seeing a sign posted -- this was on**
 25 **our older computer -- that said something about not**

1 **to tamper with the system and not to do any hacking.**
 2 **And that's all I recall that it said. It was a**
 3 **little sign.**
 4 **Q.** In a previous deposition, we marked this as
 5 Deposition Exhibit 3, and I'm going to show this to
 6 you now, Mrs. Cherrington. And let me just ask you
 7 to take a quick look at that and let me know when
 8 you've had a chance to do that.
 9 **A. Okay. I've read it.**
 10 **Q.** Have you had a chance to look at Exhibit 2 (sic)?
 11 **A. Uh-huh.**
 12 **Q.** Have you seen this before?
 13 **A. Now that I see it, I have seen it on the screen, but**
 14 **I really didn't take the time to read it thoroughly.**
 15 **Q.** Okay.
 16 **A. There are certain words in and there phrases in**
 17 **there that I can recall seeing -- having seen.**
 18 **Q.** Were you generally aware that Internet access was
 19 filtered?
 20 **A. At the time I went in there, I wasn't aware of it.**
 21 **Q.** Okay. When I showed you this document a moment ago,
 22 I don't recall if I made reference to "Deposition
 23 Exhibit 2" or "Deposition Exhibit 3." I meant to
 24 say "3" if I said "2". And I just want to make sure
 25 that we're clear that we're referring to Exhibit 3.

1 **A. Yes.**
 2 **Q.** In the pile of deposition exhibits I've put in front
 3 of you now, Deposition -- the document that we have
 4 previously marked as Deposition Exhibit 2 is a
 5 one-page document. Will you take a look at that for
 6 a moment, please.
 7 **A. Okay.**
 8 **Q.** Have you seen this document which is called a
 9 "Material Selection Review Form" prior to my just
 10 showing it to you just now?
 11 **A. No.**
 12 **Q.** Okay. So you didn't fill out a form like this when
 13 you were blocked at getting to the Idaho gallery
 14 Web site?
 15 **A. No, no, I did not.**
 16 **Q.** Apart from this Idaho gallery's Web site, have you
 17 ever experienced a similar episode where you tried
 18 to get to a Web site and have been denied access?
 19 **A. Yes, I do.**
 20 **Q.** Do you recall any specific Web sites?
 21 **A. I don't recall the specific Web site.**
 22 **Q.** In general, can you tell me were they related
 23 Web sites to a particular topic?
 24 **A. No, they weren't. It was -- Well, yeah, I can tell**
 25 **you the topic. I Googled it. It was "anal**

1 **fissure," and it blocked that -- me from putting**
 2 **that in.**
 3 **Q.** Okay. You were just researching a health topic?
 4 **A. Yes, I was.**
 5 **Q.** Okay. Did you bring that to the attention of Terry
 6 or anyone else at NCRL?
 7 **A. I didn't because I knew -- I realized, well, it's**
 8 **one of those that was filtered.**
 9 **Q.** Okay. So, again, you would not have filled out a
 10 Material Selection Review Form?
 11 **A. Right.**
 12 **Q.** Okay. Have you ever sought out assistance from the
 13 Twisp branch staff about how you might formulate an
 14 Internet inquiry to get around a blocked-site
 15 notice?
 16 **A. No.**
 17 **Q.** Have you ever talked to Terry or anyone else at
 18 Twisp about Internet searching generally, about how
 19 to be effective in Internet searching?
 20 **A. No.**
 21 **Q.** Is it your position in this lawsuit,
 22 Mrs. Cherrington, that adult patrons of NCRL
 23 branches should have unfiltered access to the
 24 Internet?
 25 **A. Yes.**

1 Q. Do you think a filter is appropriate for any topic?
 2 A. No.
 3 Q. Okay. What about, say, pornography?
 4 A. You would have to define what "pornography" is.
 5 Q. Okay. Let's use your definition of "pornography,"
 6 and you don't even have to tell me what your
 7 definition is. We all know it when we see it. I
 8 think the Supreme Court has told us.
 9 A. Uh-huh.
 10 Q. But with your definition in mind, do you agree or
 11 disagree that it's proper for NCRL to filter out
 12 Web sites that would touch upon that definition of
 13 "pornography" that you have in mind?
 14 MR. MANVILLE: Object to the form of the
 15 question.
 16 But you can go ahead and answer.
 17 THE WITNESS: Could you repeat the
 18 question, please.
 19 MR. ADAMS: I'm not sure I can.
 20 I'll let you reread it.
 21
 22 (CONTINUE ON THE FOLLOWING PAGE.)
 23
 24
 25

(THE FOLLOWING RECORD WAS READ:

2
 3 "Q But with your definition in mind, do
 4 you agree or disagree that it's
 5 proper for NCRL to filter out
 6 Web sites that would touch upon that
 7 definition of 'pornography' that you
 8 in mind?")

9
 10 THE WITNESS: Okay. Well, my definition
 11 of "pornography" is I know there are forms of
 12 pornography that are illegal that the Supreme Court
 13 has said. Those would be the ones that would be
 14 filtered if they are illegal.

15 Q. (By Mr. Adams) Would you agree that filtering for
 16 that purpose is proper?

17 A. Yes.

18 Q. And you wouldn't have a problem with the library
 19 filtering for those particular Web sites?

20 A. If it's against the law, I wouldn't have a problem.

21 Q. Okay. Does that extend to -- does that reasoning
 22 extend to other topics that would be against the
 23 law, let's say, online gambling or, let's say,
 24 Web sites focused on teaching people how to hack
 25 into computers --

1 A. Uh-huh.
 2 Q. -- things that are clearly illegal?
 3 A. Okay. If they're clearly illegal, then they could
 4 be filtered.
 5 Q. Okay. Do I take it from your statements then that
 6 you would agree that there are some types of speech
 7 which are not constitutionally protected?
 8 MR. MANVILLE: I'll object to the form.
 9 Q. (By Mr. Adams) You can still answer.
 10 A. I'm sorry, the question?
 11 Q. Would you agree with me that there are some
 12 categories of speech, of expression, which are not
 13 constitutionally protected?
 14 MR. MANVILLE: Object to the form.
 15 THE WITNESS: I don't understand the
 16 question. I'm sorry.
 17 Q. (By Mr. Adams) Okay. Let me try it a slightly
 18 different way. Would you agree with me that there
 19 are certain categories of speech, certain topics of
 20 content, which if access is blocked raise no
 21 Constitutional issue?
 22 MR. MANVILLE: Object to the form of the
 23 question.
 24 THE WITNESS: It's still confusing to me.
 25 Q. (By Mr. Adams) I don't mean to belabor this. You

1 told me that you don't have an issue with the
 2 library blocking Web sites devoted to the sorts of
 3 pornographic content which have been deemed illegal;
 4 correct?

5 A. Yes, uh-huh.

6 Q. Okay. So would you also agree that if the library,
 7 the NCRL, blocked access to those sites that it
 8 would not be invading the Constitutional rights
 9 under the First Amendment or the Constitutional
 10 rights under the Washington State Constitution of a
 11 user such as yourself?

12 MR. MANVILLE: Object to the form of the
 13 question.

14 THE WITNESS: If just -- All I can say
 15 is if it's illegal, then they have a right to filter
 16 it if it is deemed illegal by the Supreme Court or
 17 the State of Washington.

18 Q. (By Mr. Adams) Okay. And the flip side of that is
 19 you would not claim, would you, a Constitutional
 20 right to access it through NCRL's computers?

21 A. That is right. That is right.

22 Q. Thank you.

23 A. Sorry.

24 Q. So filtering for some purposes can be appropriate in
 25 your view; true?

1 **A. Yes.**
 2 **Q.** Okay. I appreciate from your prior testimony that
 3 you've never invoked the NCRL's procedure for
 4 reviewing blocked sites and possibly unblocking
 5 them, but I'll ask you to just take it as a given
 6 that such a procedure exists. All right?
 7 **A. Okay.**
 8 **Q.** If you were to invoke such a procedure, what would
 9 you believe to be a reasonable time to get a
 10 response back from the library?
 11 **A. Within the hour.**
 12 **Q.** Okay. What about within a day?
 13 **A. I think within a day is too long because those of us**
 14 **that live ten miles out would have to come in the**
 15 **next day to get an answer or we could call. But you**
 16 **have to wait too long. And if you need information**
 17 **quickly, that's too long to wait given that the**
 18 **Internet is so instantaneous. So waiting a day is**
 19 **still not good.**
 20 **Q.** Okay. If a branch had no computer terminals but you
 21 wanted to get access to a certain book --
 22 **A. Uh-huh.**
 23 **Q.** -- how long would you expect to wait for that book
 24 if it came by inter-library loan?
 25 **A. We wait about a week.**

29

Q. Is that reasonable?
 2 **A. Yes, I would say it's reasonable.**
 3 **Q.** So you would be willing to wait a week for a book
 4 and not find that unreasonable, but you wouldn't be
 5 willing to wait more than an hour to gain access to
 6 a blocked Web site.
 7 **A. Right.**
 8 **Q.** Okay. And help me understand that. Explain that to
 9 me.
 10 **A. Because a blocked Web site -- Getting a book**
 11 **through the mail takes time, but a blocked Web site**
 12 **is interfering with my right to have information**
 13 **accessed at that time.**
 14 **Q.** Aren't we still talking about ultimate access to the
 15 content? It's just the time it takes to get it.
 16 **A. No, not necessarily.**
 17 **Q.** Okay. Let's -- Work with me a little bit on this
 18 hypothetical. Let's say this Idaho gallery whose
 19 Web site you couldn't get to from --
 20 **A. Right.**
 21 **Q.** -- the NCRL terminal --
 22 **A. Right.**
 23 **Q.** -- let's say they had a book that included
 24 everything that you wanted to know about the Idaho
 25 gallery --

30

1 **A. Uh-huh.**
 2 **Q.** -- and you could get that book by waiting a week.
 3 **A. Uh-huh.**
 4 **Q.** Would that not be an appropriate solution to your
 5 need for information?
 6 **A. Not necessarily because of the time. If it's dated**
 7 **material -- If it were dated -- So to me, it**
 8 **wouldn't -- Still waiting a day for the Internet is**
 9 **still too long.**
 10 **Q.** So if your need is time sensitive, then a quick
 11 response is important to you.
 12 **A. Yes, it is.**
 13 **Q.** Okay. If your need is not time sensitive, then
 14 what?
 15 **A. Then it's -- I can wait.**
 16 **Q.** Okay. But, again, not having invoked the NCRL's
 17 mechanism for reviewing blocked Web sites, you don't
 18 know how long it takes.
 19 **A. Right.**
 20 **Q.** It might be an hour; right?
 21 **A. It could be an hour. That would be great.**
 22 **Q.** Yeah, okay. Do you know anything about the type of
 23 filtering software now in use at the library?
 24 **A. A small -- I know a little bit.**
 25 **Q.** Tell me what you know.

31

1 **A. Very little. I just know that there's a certain**
 2 **name for it.**
 3 **Q.** "Fortinet"? Does that sound familiar?
 4 **A. No, it doesn't. I think it started with an S.**
 5 **Q.** "Bess"?
 6 **A. No. And then it listed the names of categories of**
 7 **things that it filters. I can't recall all of them.**
 8 **I know one I thought was "alcohol". I don't know --**
 9 **It might have had "drugs". It had "nudity". There**
 10 **are just certain words. The "gambling" that I**
 11 **picked up because there was a big long list of them.**
 12 **Q.** How did you get access to that list?
 13 **A. I had the list, I believe, in some of the -- Is it**
 14 **the documents from the ACLU? I believe there was a**
 15 **description of what the library uses to filter.**
 16 **Q.** Okay. The categories?
 17 **A. Yes, yes.**
 18 **Q.** Okay. Are you aware that since your lawsuit has
 19 been filed the library in the normal course has
 20 changed its filtering system and gone to a different
 21 software program and service provider?
 22 **A. I had heard about that, not in great detail. I had**
 23 **just heard that they had gone to a different**
 24 **filtering system.**
 25 **Q.** Okay. And as you sit here today, do you know the

32

1 categories presently blocked by NCRL?

2 **A. I do not.**

3 **Q.** Okay. So it might be the same, might be broader,

4 might be less broad than what was previously brought

5 to your attention as the blocked categories?

6 **A. Okay.**

7 **Q.** Is that true?

8 **A. Yes.**

9 **Q.** I gather since you're not overly familiar with the

10 Fortinet namebrand and Fortinet service, which I

11 will represent to you is the current service, you're

12 unaware of Fortinet's own mechanism for any person

13 to challenge Fortinet's classification of a

14 particular Web site.

15 **A. Right, I am unaware.**

16 **Q.** Okay. We spoke about your inability to get to the

17 Idaho gallery, and we spoke about your efforts to do

18 research on the health topic.

19 **A. Uh-huh.**

20 **Q.** Were there any other Web sites that you were unable

21 to get access to?

22 **A. Yes. I went in and tried to get YouTube mainly**

23 **because there seemed to be a lot of talk about it**

24 **and I thought, "What is this?" I was curious. And**

25 **I was blocked from that.**

33

Q. Okay. Did you bring that to anyone's attention?

2 **A. I did not.**

3 **Q.** You did not.

4 **A. No, I didn't.**

5 **Q.** When did you try to get access to YouTube?

6 **A. It seems like it was six to ten months ago --**

7 **Q.** Okay.

8 **A. -- as I recall.**

9 **Q.** At that time, did you have access to your -- the

10 computer in your husband's office?

11 **A. Yes, I did.**

12 **Q.** Were you able to access YouTube there?

13 **A. I didn't try.**

14 **Q.** You could; is that true?

15 **A. I could have, yes.**

16 **Q.** Do you know whether the blocking of the Idaho

17 gallery could have been the result of a technical

18 issue as opposed to the operation of the software?

19 **A. I don't know that.**

20 **Q.** It just said "Blocked"?

21 **A. Yes.**

22 **Q.** Okay. The reason I ask is that there's information

23 in this case that if a Web site is hosted on a type

24 of server that it might create an incompatibility

25 issue that would prevent access at the terminal

34

1 level.

2 **A. Yes.**

3 **Q.** And you're not aware of that occurring?

4 **A. It did not occur. Usually when it -- if you have**

5 **trouble getting onto somebody's Web site, the page**

6 **will come up, "This page is unable to be accessed**

7 **because the Web site is under construction or out of**

8 **date." But this was a big red "STOP" sign that was**

9 **definitely filtered.**

10 **Q.** Blocked by the filter.

11 **A. Yes.**

12 **Q.** Okay. Do you post online under any kind of a

13 pseudonym?

14 **A. No.**

15 **Q.** You e-mail though, of course.

16 **A. Yes.**

17 **Q.** Okay. But you don't maintain any kind of a -- you

18 know, a screen name for blogging or anything like

19 that?

20 **A. No.**

21 **Q.** You never posted on a blog?

22 **A. No.**

23 **MR. ADAMS: Let's mark this Number 13.**

24

25 (EXHIBIT 13 WAS MARKED.)

35

1 **Q.** (By Mr. Adams) Mrs. Cherrington, I've handed you a

2 document marked Deposition Exhibit 13. And for the

3 record, I'll state that this document constitutes

4 your "Objections, Answers and Responses to

5 Defendant's First Interrogatories and Requests for

6 Production."

7 I believe you've already reviewed these

8 answers and objections, but go ahead and familiarize

9 yourself with them if you feel you need to. I just

10 have a few questions for you.

11 Is that your signature --

12 **A. Okay.**

13 **Q.** I'm sorry, go ahead.

14 **A. Okay.**

15 **Q.** Okay. Is that your signature on page 11?

16 **A. Yes.**

17 **Q.** In your answer to Interrogatory Number 5 on

18 page 4 --

19 **A. Okay.**

20 **Q.** -- in the first sentence, your answer states, "The

21 NCRL's filter denied access to certain Web sites for

22 art galleries in the Pacific Northwest that were

23 included on a list obtained from Artist Trust." Do

24 you see that?

25 **A. Right, yes.**

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Exhibit D

- 1 2. The NCRL's filter blocked a search engine query for the term "anal fissure,"
2 presenting a "STOP" sign instead of returning results.
- 3 3. The NCRL's filter blocked access to www.youtube.com. The message
4 displayed indicated that the site was being blocked because it had chat
5 capability.

6 **INTERROGATORY NO. 6:** Prior to the filing of the Complaint, were you aware of
7 NCRL's Internet Usage Policy?

8 **ANSWER:** Ms. Cherrington was not familiar with any particular document known as the
9 Internet Usage Policy prior to the filing of the Complaint. She remembers seeing a sign
10 posted near the computer terminal that she was using which stated that users should not
11 tamper with or hack into the library's computer system, but she does not recall this document
12 saying anything about Internet filtering.

13 **INTERROGATORY NO. 7:** Did you accept NCRL's Internet Usage Policy before
14 accessing the Internet on NCRL computers?

15 **ANSWER:** Ms. Cherrington objects to the word "accept" as vague and ambiguous. Subject
16 to and without waiver of the foregoing objection, Ms. Cherrington states that she does not
17 recall signing or orally agreeing to any specific terms before accessing the Internet on any of
18 the NCRL's computers.

19 **INTERROGATORY NO. 8:** With respect to each website identified in Interrogatory No. 5,
20 state the reason(s) that you sought access to the site.

21 **ANSWER:**

- 22 1. Ms. Cherrington was looking for art gallery websites because she is a
23 professional photographer and was hoping to find art galleries at which to sell
24 her work.
- 25 2. Ms. Cherrington wished to learn about anal fissures because of health problems
26 she was experiencing.

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- 1 3. Ms. Cherrington wished to explore www.youtube.com because it was a topic of
2 public discussion and debate that she wished to become familiar with.

3 **INTERROGATORY NO. 9:** Discuss what efforts, if any, you made to bring your concerns
4 about the blocked sites (identified in Interrogatory No. 5) to the attention of NCRL personnel,
5 including the name of any individual that you spoke with, the date of the conversation and the
6 response.

7 **ANSWER:**

- 8 1. The denial of access to the art gallery Web sites occurred in early summer
9 2005. On the day access was denied, Ms. Cherrington spoke with librarian
10 Terry Dixon. Ms. Dixon said that the denial of access resulted from the
11 library's filtering software and that she was unable to do anything to allow
12 access to the blocked sites.
13 2. The blockage of the "anal fissure" search occurred shortly after the first
14 incident. Ms. Cherrington did not bother the librarian about it, since she had
15 been told that the filter could not be turned off.
16 3. The denial of access to www.youtube.com occurred sometime during the
17 winter of 2006-07. Ms. Cherrington did not speak to a librarian about this.

18 **INTERROGATORY NO. 10:** Discuss what efforts, if any, you made to bring you concerns
19 about the blocked sites (identified in Interrogatory No. 5) to the attention of any other person
20 or entity (other than your attorney), including state or federal officials/employees. For each
21 individual identify their (its) name, the date of the conversation and the response.

22 **ANSWER:** Ms. Cherrington spoke about the blocked sites to her husband and friends, but not
23 to any state or federal officials.

24 **INTERROGATORY NO 11:** Have you accessed, or attempted to access, the Internet at an
25 NCRL branch since the Complaint was filed?

26 **ANSWER:** Yes.

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