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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

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

Plaintiffs,

v.

NORTH CENTRAL REGIONAL LIBRARY
DISTRICT,

Defendant.

No. CV-06-327-EFS

**DECLARATION OF DUNCAN
MANVILLE IN SUPPORT OF
PLAINTIFFS’ MOTION FOR
SUMMARY JUDGMENT**

I, Duncan Manville, declare as follows:

1. I am one of the attorneys for Plaintiffs Sarah Bradburn, Pearl Cherrington, Charles Heinlen and the Second Amendment Foundation. I am competent to testify to the matters stated herein. I make this declaration on personal knowledge.

2. Attached as Exhibit A. to Plaintiffs’ Statement of Facts in Support of Their Motion for Summary Judgment is a true and correct copy of Plaintiffs’ Complaint for Declaratory and Injunctive Relief.

1 3. Attached as Exhibit B. to Plaintiffs' Statement of Facts in Support of Their
2 Motion for Summary Judgment is a true and correct copy of the Answer and Affirmative
3 Defenses of Defendant North Central Regional Library District.

4 4. Attached as Exhibit C. to Plaintiffs' Statement of Facts in Support of Their
5 Motion for Summary Judgment is a true and correct copy of Plaintiff Sarah Bradburn's
6 Objections, Answers and Responses to Defendant's First Interrogatories and Requests for
7 Production to Plaintiff Sarah Bradburn.

8 5. Attached as Exhibit D. to Plaintiffs' Statement of Facts in Support of Their
9 Motion for Summary Judgment is a true and correct copy of Plaintiff Pearl Cherrington's
10 Objections, Answers and Responses to Defendant's First Interrogatories and Requests for
11 Production to Plaintiff Pearl Cherrington.

12 6. Attached as Exhibit E. to Plaintiffs' Statement of Facts in Support of Their
13 Motion for Summary Judgment is a true and correct copy of Plaintiff Charles Heinlen's
14 Objections, Answers and Responses to Defendant's First Interrogatories and Requests for
15 Production to Plaintiff Charles Heinlen.

16 7. Attached as Exhibit F. to Plaintiffs' Statement of Facts in Support of Their
17 Motion for Summary Judgment is a true and correct copy of Plaintiff Second Amendment
18 Foundation's Objections, Answers and Responses to Defendant's First Interrogatories and
19 Requests for Production to the Second Amendment Foundation.

20 8. Attached as Exhibit G. to Plaintiffs' Statement of Facts in Support of Their
21 Motion for Summary Judgment is a true and correct copy of Defendant's Responses to
22 Plaintiffs' First Interrogatories and Requests for Production, and Exhibits B and C thereto.

23 9. Attached as Exhibit H. to Plaintiffs' Statement of Facts in Support of Their
24 Motion for Summary Judgment is a true and correct copy of excerpts from the Deposition of
25 Sally W. Beesley.

1 10. Attached as Exhibit I. to Plaintiffs' Statement of Facts in Support of Their
2 Motion for Summary Judgment is a true and correct copy of excerpts from the Deposition
3 Upon Oral Examination of Sarah Maria Bradburn.

4 11. Attached as Exhibit J. to Plaintiffs' Statement of Facts in Support of Their
5 Motion for Summary Judgment is a true and correct copy of excerpts from the Deposition
6 Upon Oral Examination of Pearl Anne Cherrington.

7 12. Attached as Exhibit K. to Plaintiffs' Statement of Facts in Support of Their
8 Motion for Summary Judgment is a true and correct copy of excerpts from the Deposition
9 Upon Oral Examination of Alan Merrill Gottlieb.

10 13. Attached as Exhibit L. to Plaintiffs' Statement of Facts in Support of Their
11 Motion for Summary Judgment is a true and correct copy of excerpts from the Deposition
12 Upon Oral Examination of Bennett Haselton.

13 14. Attached as Exhibit M. to Plaintiffs' Statement of Facts in Support of Their
14 Motion for Summary Judgment is a true and correct copy of excerpts from the Deposition
15 Upon Oral Examination of Charles Merle Heinlen.

16 15. Attached as Exhibit N. to Plaintiffs' Statement of Facts in Support of Their
17 Motion for Summary Judgment is a true and correct copy of excerpts from the Deposition
18 Upon Oral Examination of Daniel A. Howard.

19 16. Attached as Exhibit O. to Plaintiffs' Statement of Facts in Support of Their
20 Motion for Summary Judgment is a true and correct copy of excerpts from the Deposition
21 Upon Oral Examination of Dean Marney.

22 17. Attached as Exhibit P. to Plaintiffs' Statement of Facts in Support of Their
23 Motion for Summary Judgment is a true and correct copy of excerpts from the Deposition of
24 Kenton Oliver.

1 18. Attached as Exhibit Q. to Plaintiffs' Statement of Facts in Support of Their
2 Motion for Summary Judgment is a true and correct copy of excerpts from the Deposition
3 Upon Oral Examination of June Pinnell-Stephens.

4 19. Attached as Exhibit R. to Plaintiffs' Statement of Facts in Support of Their
5 Motion for Summary Judgment is a true and correct copy of excerpts from the Deposition of
6 Paul Resnick.

7 20. Attached as Exhibit S. to Plaintiffs' Statement of Facts in Support of Their
8 Motion for Summary Judgment is a true and correct copy of excerpts from the Deposition
9 Upon Oral Examination of Barbara G. Walters.

10 21. Attached as Exhibit T. to Plaintiffs' Statement of Facts in Support of Their
11 Motion for Summary Judgment is a true and correct copy of Deposition Exhibit 3.

12 22. Attached as Exhibit U. to Plaintiffs' Statement of Facts in Support of Their
13 Motion for Summary Judgment is a true and correct copy of Deposition Exhibit 21, the expert
14 report that Plaintiffs' expert Bennett Haselton prepared. Mr. Haselton authenticated this
15 exhibit during his deposition at 17:23-18:7.

16 23. Attached as Exhibit V. to Plaintiffs' Statement of Facts in Support of Their
17 Motion for Summary Judgment is a true and correct copy of Deposition Exhibit 25, the expert
18 report that Plaintiffs' expert June Pinnell-Stephens prepared (without appendices). Ms.
19 Pinnell-Stephens authenticated this exhibit during her deposition at 73:16-22.

20 24. Attached as Exhibit W. to Plaintiffs' Statement of Facts in Support of Their
21 Motion for Summary Judgment is a true and correct copy of Deposition Exhibit 30.

22 25. Attached as Exhibit X. to Plaintiffs' Statement of Facts in Support of Their
23 Motion for Summary Judgment is a true and correct copy of Deposition Exhibit 31.

24 26. Attached as Exhibit Y. to Plaintiffs' Statement of Facts in Support of Their
25 Motion for Summary Judgment is a true and correct copy of Deposition Exhibit 38.

1 27. Attached as Exhibit Z. to Plaintiffs' Statement of Facts in Support of Their
2 Motion for Summary Judgment is a true and correct copy of Deposition Exhibit 41.

3 28. Attached as Exhibit AA. to Plaintiffs' Statement of Facts in Support of Their
4 Motion for Summary Judgment is a true and correct copy of Deposition Exhibit 45.

5 29. Attached as Exhibit BB. to Plaintiffs' Statement of Facts in Support of Their
6 Motion for Summary Judgment is a true and correct copy of Deposition Exhibit 46.

7 30. Attached as Exhibit CC. to Plaintiffs' Statement of Facts in Support of Their
8 Motion for Summary Judgment is a true and correct copy of Deposition Exhibit 48.

9 31. Attached as Exhibit DD. to Plaintiffs' Statement of Facts in Support of Their
10 Motion for Summary Judgment is a true and correct copy of Deposition Exhibit 49.

11 32. Attached as Exhibit EE. to Plaintiffs' Statement of Facts in Support of Their
12 Motion for Summary Judgment is a true and correct copy of Deposition Exhibit 50.

13 33. Attached as Exhibit FF. to Plaintiffs' Statement of Facts in Support of Their
14 Motion for Summary Judgment is a true and correct copy of Deposition Exhibit 52.

15 34. Attached as Exhibit GG. to Plaintiffs' Statement of Facts in Support of Their
16 Motion for Summary Judgment is a true and correct copy of Deposition Exhibit 54, the expert
17 report that NCRL's expert Paul Resnick prepared (without appendices). Dr. Resnick
18 authenticated this exhibit during his deposition at 31:5-8.

19 35. Attached as Exhibit HH. to Plaintiffs' Statement of Facts in Support of Their
20 Motion for Summary Judgment is a true and correct copy of Deposition Exhibit 62.

21 36. Attached as Exhibit II. to Plaintiffs' Statement of Facts in Support of Their
22 Motion for Summary Judgment is a true and correct copy of Deposition Exhibit 63.

23 37. Attached as Exhibit JJ. to Plaintiffs' Statement of Facts in Support of Their
24 Motion for Summary Judgment are true and correct copies of a printout of the myspace.com
25 splash page and printouts of the splash pages of the MySpace profiles of Hillary Clinton,
26

1 Mike Huckabee, John McCain, Barack Obama, Ron Paul and Mitt Romney. I retrieved these
2 documents from the myspace.com Web site.

3 38. Attached as Exhibit KK. to Plaintiffs' Statement of Facts in Support of Their
4 Motion for Summary Judgment is a true and correct copy of a printout of the myspace.com
5 Terms & Conditions, which I retrieved from the myspace.com Web site.

6 DATED this 4th day of February, 2008.

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