

The Honorable Edward F. Shea

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON
AT SPOKANE

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

Plaintiffs,

v.

NORTH CENTRAL REGIONAL
LIBRARY DISTRICT,

Defendant.

)
)
) NO. CV-06-327-EFS
)

) *ERRATA* TO DEFENDANT NORTH
) CENTRAL LIBRARY DISTRICT'S
) MOTION FOR SUMMARY
) JUDGMENT
)
)

ERRATA TO DEFENDANT NORTH
CENTRAL LIBRARY DISTRICT'S
MOTION FOR SUMMARY

JUDGMENT - 1
CV-06-327-EFS
#659327 v1 / 42703-001

Law Offices
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1 Defendant North Central Regional Library (“NCRL”) files this *Errata* to
2 correct two typographical errors contained in its Motion for Summary Judgment,
3
4 filed on February 4, 2008.

5 1. At page 10/lines 22-26, NCRL’s Motion for Summary Judgment,
6
7 reads: “NCRL blocks the following categories: malware, spyware, hacking,
8 proxy avoidance, phishing, gambling, adult materials, nudity/risqué,
9 pornography, web chat, instant messaging, and personal relationships. (NCRL
10 Statement, ¶54).”

12 NCRL does not block personal relationships. The current filtering profile
13
14 is accurately set forth in NCRL’s Statement of Facts at ¶54 as cited in the
15 motion and in the corresponding Declaration of Barbara Walters offered in
16 support of the same.
17

18 2. At page 19/lines 8-14, NCRL’s Motion for Summary Judgment,
19
20 reads: “Although a degree of underblocking and overblocking is inevitable,
21 NCRL expert (Professor Paul Resnick) determined that only 20 web pages were
22 incorrectly blocked out of approximately 600,000 web pages accessed across the
23 NCRL network in a recent one week period. (NCRL Statement, ¶110).”
24

25
26
27 *ERRATA TO DEFENDANT NORTH*
28 *CENTRAL LIBRARY DISTRICT’S*
MOTION FOR SUMMARY
JUDGMENT - 2

CV-06-327-EFS
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1 Professor Resnick determined that “only 20 pages were incorrectly
2 blocked out of 60,000 web pages access across the NCRL network” during the
3 period of August 23-29, 2007. This fact is set forth accurately in NCRL’s
4 Statement of Facts at ¶110 as cited in the motion and in the corresponding
5 Declaration of Paul Resnick offered in support of the same.
6
7

8 DATED this 13th day of February, 2008.

9
10 KARR TUTTLE CAMPBELL

11 By: /s/ Thomas D. Adams

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27 *ERRATA* TO DEFENDANT NORTH
28 CENTRAL LIBRARY DISTRICT’S
MOTION FOR SUMMARY

JUDGMENT - 3

CV-06-327-EFS

#659327 v1 / 42703-001

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CERTIFICATE OF SERVICE

I hereby certify that on February 13, 2008, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the persons listed below:

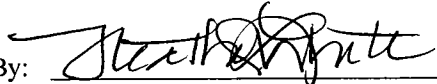
Duncan Manville
1629 2nd Ave. W
Seattle, WA 98119

Aaron Caplan
ACLU of Washington
705 Second Ave., Ste. 300
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Notice has been delivered by U.S. Mail to:

Catherine Crump
American Civil Liberties Union
Foundation
125 Broad Street, 17th Floor
New York, NY 10004

KARR TUTTLE CAMPBELL

By: 
Heather L. White
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**ERRATA TO DEFENDANT NORTH
CENTRAL LIBRARY DISTRICT'S
MOTION FOR SUMMARY**

JUDGMENT - 4
CV-06-327-EFS
#659327 v1 / 42703-001

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