

The Honorable Edward F. Shea

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON
AT SPOKANE

13	SARAH BRADBURN, PEARL)	
14	CHERRINGTON, CHARLES)	
15	HEINLEN, and THE SECOND)	NO. CV-06-327-EFS
15	AMENDMENT FOUNDATION,)	
16)	DECLARATION OF BARBARA
17	Plaintiffs,)	WALTERS IN SUPPORT OF
18)	DEFENDANT NORTH CENTRAL
18	v.)	LIBRARY DISTRICT'S REPLY TO
19)	ITS MOTION FOR SUMMARY
20	NORTH CENTRAL REGIONAL)	JUDGMENT
20	LIBRARY DISTRICT,)	
21)	
22	Defendant.)	
22)	

DECLARATION OF BARBARA
WALTERS IN SUPPORT OF
DEFENDANT NORTH CENTRAL
LIBRARY DISTRICT'S REPLY TO ITS
MOTION FOR SUMMARY

JUDGMENT - 1
CV-06-327-EFS
#661598 v1 / 42703-001

Law Offices
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1 I, Barbara Walters, declare as follows:

2 1. I am over the age of 18 and competent to testify to the matters set
3
4 forth herein.

5 2. I am the Information Technology Manager for NCRL.

6
7 3. Internet access was gradually made available at NCRL branch
8 locations. Plaintiffs' correctly note that the first branch with Internet access was
9
10 NCRL's Omak branch, which went online in November 1999.

11 4. The second branch was NCRL's Wenatchee branch, which went
12
13 online in January 2000.

14 5. NCRL used a Surfwatch brand filter at both the Wenatchee and
15
16 Omak locations, however, the filtering software consistently froze the public use
17
18 computers that they were installed on.

19 6. NCRL implemented its first system-wide Internet filter in
20
21 December 2000 and that filter was referred to as "BESS."

22 7. In December 2000, most of NCRL's branches did not have public
23
24 internet computers. In fact, Internet access was not available at all 28 branches

25 DECLARATION OF BARBARA
26 WALTERS IN SUPPORT OF
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1 until November 2002, following the receipt of a grant from the Bill and Melinda
2 Gates Foundations for the purchase of additional computers.

3
4 8. NCRL has allowed access to all specific websites requested by
5 Plaintiffs, except some requested by Charles Heinlen. Certain requests were
6 rejected by NCRL administration because the content was inconsistent with
7 NCRL's Mission and Collection Development Policy.

8
9
10 9. I have personally researched the feasibility of disabling the filter
11 for adult patrons.

12
13 10. Without having to purchase additional authentication software or
14 hardware, or purchasing a new filtering solution, it is my understanding that
15 NCRL might have to designate one computer at each location for unfiltered
16 access which is not permitted by CIPA.

17
18 11. Internet access on staff computers at all NCRL branches is filtered.
19 Staff computers at the administration building in Wenatchee are filtered, but
20 certain computers are enabled to review Internet sites requested by patrons.
21

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1 I declare under penalty of perjury under the laws of the United States of
2 America that the foregoing is true and correct.

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4 Dated this 3rd day of March, 2008 at Wenatchee, Washington.

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6 
7 Barbara Walters

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25 DECLARATION OF BARBARA
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JUDGMENT - 4

CV-06-327-EFS

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1 **CERTIFICATE OF SERVICE**

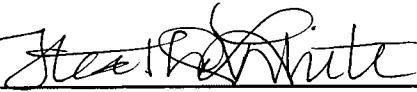
2 I hereby certify that on March 3, 2008, I electronically filed the foregoing
3
4 with the Clerk of the Court using the CM/ECF system which will send
5 notification of such filing to the persons listed below:
6

7 Duncan Manville
8 1629 2nd Ave. W
9 Seattle, WA 98119

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10 Catherine Crump
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17 By: 
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JUDGMENT - 5
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