THE HONORABLE EDWARD F. SHEA		
UNITED STATES DISTRICT COURT		
EASTERN DISTRIC	CT OF WASHINGTON	
SARAH BRADBURN, PEARL	No. CV-06-327-EFS	
CHERRINGTON, CHARLES HEINLEN, and the SECOND		
AMENDMENT FOUNDATION,		
Plaintiffs,	PLAINTIFFS' MOTIONS IN LIMINE	
V.		
NORTH CENTRAL REGIONAL LIBRARY DISTRICT,		
Defendant		
Plaintiffs move that the court issue	e the following orders on three evidentiary	
issues in advance of trial:		
1. NCRL may not present testi	mony from witnesses Connie Kuhlman,	
Sharon Reddick, Katy Sessions and Deb	orah Moore, because they were not timely	
identified. See Fed. R. Civ. P. 37(c)(1).		
PLAINTIFFS' MOTIONS IN LIMINE 1	American Civil Liberties Union of Washington Foundation	

OF WASHINGTON FOUNDATION 705 Second Avenue, Suite 300 Seattle, Washington 98104-1799 (206) 624-2184

1		2.	NCRL may not introduce	e hearsay statements from branch librarians.	
2	<u>See</u> F	<u>See</u> FRE 803.			
3 4		3.	NCRL may not introduce	e hearsay statements from newspaper articles	
5	about events allegedly occurring in other libraries (proposed defense exhibits 706-				
6	715). <u>See</u> FRE 803.				
7	This motion is supported by the accompanying memorandum and the				
8 9	Declaration of Duncan Manville.				
10					
11	DATED this 31 st day of March, 2008.				
12				AMERICAN CIVIL LIBERTIES UNION	
13 14				OF WASHINGTON FOUNDATION	
15				By: /s/ Aaron H. Caplan	
16				Aaron H. Caplan, WSBA #22525 American Civil Liberties Union of	
17				Washington Foundation	
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25 26					
20					
	PLAIN	TIFFS	' MOTIONS IN LIMINE 2	AMERICAN CIVIL LIBERTIES UNION OF WASHINGTON FOUNDATION 705 Second Avenue, Suite 300 Seattle, Washington 98104-1799 (206) 624-2184	

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		AMERICAN CIVIL LIBERTIES UNION
	PLAINTIFFS' MOTIONS IN LIMINE 3	OF WASHINGTON FOUNDATION 705 Second Avenue, Suite 300 Seattle, Washington 98104-1799 (206) 624-2184

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2	CERTIFICATE OF SERVICE		
3	I hereby certify that on March 31, 2008, I electronically filed the foregoing		
4 5	document with the Clerk of Court using the CM/ECF system, which will send		
6	notification of such filing to the persons listed below:		
7			
8	Thomas D. Adams Celeste Mountain Monroe		
9	KARR TUTTLE CAMPBELL 1201 Third Avenue, Suite 2900		
10	Seattle, WA 98101		
11	Attorneys for Defendant		
12			
13 14	DATED this 31 st day of March, 2008.		
14			
16	AMERICAN CIVIL LIBERTIES UNION		
17	OF WASHINGTON FOUNDATION		
18	By: /s/ Aaron H. Caplan		
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	PLAINTIFFS' MOTIONS IN LIMINE PLAINTIFFS' MOTIONS IN LIMINE AMERICAN CIVIL LIBERTIES UNION OF WASHINGTON FOUNDATION 705 Second Avenue, Suite 300 Seattle, Washington 98104-1799 (206) 624-2184		