

The Honorable Edward F. Shea

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

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

**PLAINTIFFS' MOTION FOR
SUMMARY JUDGMENT**

Plaintiffs Sarah Bradburn, Pearl Cherrington, Charles Heinlen and the Second Amendment Foundation move for summary judgment pursuant to Rule 56(c) of the Federal Rules of Civil Procedure. The basis for this Motion is more fully set forth in Plaintiffs' Memorandum of Law in Support of Their Motion for Summary Judgment; Plaintiffs' Statement of Material Facts in Support of Their Motion for Summary Judgment; and the Declaration of Duncan Manville, filed concurrently herewith.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

Plaintiffs move for entry of an order:

A. Directing that summary judgment be entered in favor of Plaintiffs; and

B. Directing that a permanent injunction be entered as follows: NCRL is enjoined from operating its Internet filtering system unless it establishes policies and procedures to ensure that the filter will be immediately disabled upon the request of any adult library patron.

DATED this 4th day of February, 2008.

AMERICAN CIVIL LIBERTIES UNION OF WASHINGTON FOUNDATION

By: /s/ Duncan Manville
Duncan Manville, WSBA #30304
1629 2nd Avenue W.
Seattle, WA 98119
Tel. (206) 288-9330
Fax (206) 624-2190
duncan.manville@yahoo.com

Aaron H. Caplan, WSBA #22525
American Civil Liberties Union of Washington Foundation
705 Second Avenue, Third Floor
Seattle, WA 98103
Tel. (206) 624-2184
Fax (206) 624-2190
caplan@aclu-wa.org

Catherine Crump, pro hac vice
American Civil Liberties Union Foundation
125 Broad Street, 18th Floor
New York, NY 10004
Tel. (212) 519-7806
ccrump@aclu.org

Counsel for Plaintiffs