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**IN THE CIRCUIT COURT FOR THE STATE OF OREGON
COUNTY OF MARION**

**BRYN HAZELL, FRANCIS
NELSON, TOM CIVILETTI, DAVID
DELK, GARY DUELL, JOAN
HORTON, and KEN LEWIS,**

Plaintiffs,

v.

**BILL BRADBURY, Secretary of
State of the State of Oregon,**

and

**HARDY MYERS, Attorney General
of the State of Oregon,**

Defendants.

and

**CENTER TO PROTECT FREE
SPEECH, INC., an Oregon
nonprofit corporation, and FRED
VANNATTA,**

**Intervenor-Defendants and
Cross-Claimants**

Case No. 06C-22473

**DECLARATION OF
LINDA K. WILLIAMS**

**EXPLAINING RESEARCH METHODS
IN SUPPORT OF HORTON
PLAINTIFFS MEMORANDUM
OPPOSING SUMMARY JUDGMENT
FOR DEFENDANTS AND
INTERVENORS**

**Judge Mary M. James
Hearing: June 18, 2007
9:30 a.m.**

I, LINDA K. WILLIAMS, under penalty of perjury, make the following statements from my own personal knowledge.

- 1 1. I represent certain plaintiffs herein. During February and March of 2007, I
2 conducted research in support of Plaintiffs' arguments in support of summary
3 judgment and in opposition to cross-motions for summary judgment herein.
4
- 5 2. Some of this research material has not heretofore been widely available, so I
6 make this declaration to explain my research methods.
7
- 8 3. The historical texts discussed at pages 24-54 and the Appendix to the
9 Memorandum filed this date are all available in digital form from Google
10 Books: <http://books.google.com> (also accessible from the "more" menu at the
11 main Google page.) This is a free database and the research project has
12 been widely reported in the press. Many university libraries are participating in
13 the on-going development of this resource by making their original
14 manuscripts and published material available for optical scanning. In order to
15 view and search texts, one needs Adobe Acrobat, a widely available free
16 program.
17
- 18 4. Each of the referenced texts is available in some university collections, and all
19 of the texts I cite show they were digitalized in 2005 and 2006. Each of the
20 digitalized texts includes the pages with the imprint of the library source, cover
21 and title pages. For these reasons, and based on information in ¶ 3, I believe
22 the texts to be what they purport to be, and that they are in fact true digital
23 copies of the originals in the library collections.
24
- 25 5. Associated information under the "more about this book" link includes the
26 physical location of copies of the book. This is the source of the list of
27 locations showing the wide distribution of OBSERVATION ON CORN LAWS
28 PRAVITY AND INGRATITUDE in the United States, Appendix pages 3-4.
29
- 30 6. The search function is similar to performing a search in WestLaw or Lexis
31 legal databases. I undertook the initial research by typing in keywords (such
32 as: electioneer campaign) with the publication date field limited to relevant
33 time periods. To view a text cited in the Memorandum or Appendix, one may
34 type the title of the book into the search field. This results in a display of the
35 digitalized version, or versions, of that title. Clicking on the title link will yield a
36 digitalized version of the book, which can be viewed and (in many cases)
37 downloaded. From the book display, one can either go to a cited page via the
38 page number function of Acrobat, or the scroll function. Within each book
39 there is a further search function, so that entering the keywords of a quotation
40 into the search field will find that text in the book, highlighted.
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7. The copy of the portion of the penal code of Texas, appended hereto, was obtained by downloading the text pages from DIGEST OF THE GENERAL STATUTES OF THE STATE OF TEXAS (UPON AUTHORITY OF THE LEGISLATURE), (Goldham & White 1859), and printing.

Linda K. Williams

Dated: This 30th day of March, 2007
In Portland, Multnomah County,
Oregon

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CERTIFICATE OF SERVICE

I hereby certify that I served a true copy of the foregoing DECLARATION by (1) e-mail and (2) first class mail to all parties listed below, deposited in the U.S. Postal Service at Portland, Oregon, with first class postage prepaid.

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Dated: March 30, 2007

Linda K. Williams