

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF VERMONT

AMERICAN BOOKSELLERS FOUNDATION  
FOR FREE EXPRESSION; AMERICAN CIVIL  
LIBERTIES UNION OF VERMONT; ASSOCIATION  
OF AMERICAN PUBLISHERS; FREEDOM TO READ  
FOUNDATION; NATIONAL ASSOCIATION OF  
RECORDING MERCHANTISERS; NORTHSHIRE  
INFORMATION, INC.; PSINET INC.; RECORDING  
INDUSTRY ASSOCIATION OF AMERICA, INC.;  
THE SEXUAL HEALTH NETWORK, INC.,

Plaintiffs,

v.

HOWARD DEAN, in his official capacity as  
GOVERNOR OF THE STATE OF VERMONT;  
WILLIAM H. SORRELL, in his official  
capacity as ATTORNEY GENERAL OF THE  
STATE OF VERMONT; LAUREN BOWERMAN,  
DAN M. DAVIS, KEITH W. FLYNN, DALE O. GRAY,  
JAMES A. HUGHES, VINCENT ILLUZZI,  
JAMES D. McKNIGHT, JAMES P. MONGEON,  
JOEL W. PAGE, JOHN T. QUINN, GEORGE E. RICE,  
ROBERT L. SAND, TERRY J. TRONO,  
and WILLIAM D. WRIGHT, in their official capacities  
as VERMONT STATE'S ATTORNEYS,

Defendants.

Civil No. 1:01-CV-46

**STIPULATED MOTION TO AMENDED COMPLAINT**

Pursuant to Local Rule 7.1 and 15.1, plaintiffs herein move to amend its complaint seeking declaratory judgment and injunctive relief against the enforcement of Vermont laws which impose criminal penalties on the availability, display and dissemination of constitutionally protected speech on the Internet to take into account recent amendments by the Vermont General

Assembly, which were signed into law on June 13, 2001 and which become effective on July 1, 2001.

Pursuant to L.R. 15.1, a redlined version of the proposed amended complaint is attached hereto. A non-redlined version is also attached hereto.

In support of its motion, plaintiffs rely on the accompanying memorandum of law.

Pursuant to L.R. 7.1(b), plaintiffs have sought and obtained the concurrence of the defendants.

Respectfully submitted,

Dated: \_\_\_\_\_

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