

EXHIBIT 9

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

ASSOCIATION OF AMERICAN
PUBLISHERS,

Plaintiff,

v.

BRIAN E. FROSH, Attorney General of the
State of Maryland

Defendant.

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Civil Action No.:
1:21-cv-03133-DLB

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**DECLARATION OF LYNÆ POLK IN SUPPORT OF DEFENDANT’S
CONSOLIDATED MEMORANDUM OF LAW IN SUPPORT OF MOTION TO
DISMISS AND
OPPOSITION TO PLAINTIFF’S MOTION FOR PRELIMINARY INJUNCTION**

I, Lynae Turner Polk, hereby declare as follows:

1. I am an Assistant Attorney General with the Maryland Office of the Attorney General, and I am co-counsel for Defendant, Attorney General Brian E. Frosh, in the above-captioned case.
2. I submit this declaration in support of the Defendant’s Motion to Dismiss and Opposition to Plaintiff’s Motion for Preliminary Injunction filed contemporaneously herewith.
3. Attached hereto as **EXHIBIT 1** is a true and correct copy of the Declaration of Michael Blackwell – Library Director for St. Mary’s County Library. Exhibit 1 also includes Exhibit 1A – a true and correct copy of the Michael Blackwell Support Letter for House Bill 518.
4. Attached hereto as **EXHIBIT 2** is a true and correct copy of the Declaration of Alan Inouye - Senior Director of Public Policy & Government Relations for the American Library Association. Exhibit 2 also includes Exhibit 2 A- a true and correct copy of the American Library Association Support Letter.

5. Attached hereto as **EXHIBIT 3** is a true and correct copy of the Sponsor Statement of Senator Nancy King.
6. Attached hereto as **EXHIBIT 4** is a true and correct copy of Testimony of Delegate Kathleen M. Dumais in support of H.B. 518.
7. Attached hereto as **EXHIBIT 5** is a true and correct copy of the Support Letter from James C. Cooke and Natalie Edington - Interim Co-Directors for the Baltimore County Public Library.
8. Attached hereto as **EXHIBIT 6** is a true and correct copy of Testimony of Morgan Miller – President of the Maryland Library Association.
9. Attached hereto as **EXHIBIT 7** is a true and correct copy of the Declaration of Irene Padilla - State Librarian for the Maryland State Library Agency. Exhibit 7 also includes Exhibit 7A which is a true and correct copy of the Fiscal Year 2020 Report from the Maryland Library System.
10. Attached hereto as **EXHIBIT 8** is a true and correct copy of the Support Letter from Roberta R. Phillips (CEO) and Blane Halliday (Director for Collection Strategies) for the Prince George’s County Memorial Library System.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge, information and belief.

Executed on January 14, 2022 in Baltimore County, Maryland.

/s/ Lynae Turner Polk
Lynae Turner Polk
Co-Counsel for Defendant
Attorney General
Brian E. Frosh