

Hedy Weinberg - April 30, 2018

36

1 Admission No. 10, appearing in Exhibit 8, is,
2 (as read) Admit that ACLU of Tennessee has no evidence
3 that the ACLU of Tennessee's board of directors
4 approved or adopted bylaws submitted by the WTCLU or
5 The American Civil Liberties of/in West Tennessee,
6 Inc., to become the West Tennessee chapter of the ACLU
7 Tennessee prior to the 1976 Kendrick litigation.

8 And the response to that is an objection. But
9 then it says, (as read) ACLU of Tennessee admits it
10 has no records in its possession, custody, or control
11 that evidence ACLU Tennessee approving or adopting
12 bylaws for an entity known as the West Tennessee Civil
13 Liberties Union, Inc. ACLU of Tennessee denies that
14 it has no records evidencing approval or bylaws for
15 its West Tennessee chapter.

16 So I guess my question was: I took that to
17 mean that perhaps there are records that reflect
18 approval of bylaws for the West Tennessee chapter, and
19 I was wondering if you knew where they were?

20 A. I don't know where they are.

21 Q. All right.

22 A. We have a lot of paper in our office.

23 Q. All right. Well, again, I may have missed --

24 MR. WELLFORD: Tom, if you think I missed
25 it, you could probably point me to it. And if there