

Despite two months of negotiations, and repeated follow-up efforts by Plaintiffs, Defendant has not sufficiently supplemented its deficient responses to Plaintiffs' Discovery Requests. Further, Defendant has not produced many of the non-privileged materials reasonably requested by Plaintiffs, nor has Defendant committed to a date by which any such materials will be produced. The Court additionally finds that the recitation of documents in Defendant's Initial Disclosures pursuant to Fed. R. Civ. P. 26(a)(1)(A)(ii) is deficient.

Having fully considered the moving and opposition papers, and all other matters presented to the Court, it is hereby

ORDERED that Plaintiffs' Amended Motion, to the extent not withdrawn in its Reply Memorandum, is **GRANTED**, and it is further

ORDERED that Defendant's General Objections not specifically tailored to, or specifically recited in its responses to, Plaintiffs' Discovery Requests are hereby waived; and it is further

ORDERED that Defendant produce the materials relied on in its Amended Responses to Plaintiffs' Interrogatory No. 5 and Production Request No. 7; and it is further

ORDERED that Defendant produce materials responsive to Plaintiffs' Production Requests Nos. 1, 2, 5, and 9; and it is further

ORDERED that Defendant supplement its response to Plaintiffs' Interrogatories Nos. 6 and 8; and it is further

ORDERED that Defendant supplement its responses to Plaintiffs' Admission Requests Nos. 3 and 6; and it is further

ORDERED that Defendant supplement its Initial Disclosures required under Fed. R. Civ. P. 26(a)(1)(a)(ii); and it is further

ORDERED that Defendant shall serve the above-noted items, documents and supplementation on Plaintiffs' counsel no later than _____, 2015.

IT IS SO ORDERED:

Dated: _____, 20__

Hon. Deborah A. Robinson
United States District Magistrate Judge

{431384US, 11520668_1.DOCX}

Attorneys to be notified of the entry of this Order:

Counsel for Plaintiffs:

Jonathan Hudis
Kathleen Cooney-Porter
OBLON, SPIVAK, McCLELLAND,
MAIER & NEUSTADT, LLP
1940 Duke Street
Alexandria, VA 22314
Tel. (703) 413-3000
Fax (703) 413-2220
E-Mail jhudis@oblon.com
E-Mail kcooney-porter@oblon.com

Counsel for Defendant:

Andrew P. Bridges
FENWICK & WEST LLP
555 California Street, 112th Floor
San Francisco, CA 94104
abridges@fenwick.com

David Halperin
1530 P Street NW
Washington, DC 20005
davidhalperindc@gmail.com

Mitchell L. Stoltz
Corynne McSherry
ELECTRONIC FRONTIER FOUNDATION
815 Eddy Street
San Francisco, CA 94109
mitch@eff.org
corynne@eff.org