

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

AMERICAN EDUCATIONAL RESEARCH )  
ASSOCIATION, INC., AMERICAN )  
PSYCHOLOGICAL ASSOCIATION, INC., )  
and NATIONAL COUNCIL ON )  
MEASUREMENT IN EDUCATION, INC., )

Civil Action No. 1:14-cv-00857-TSC-DAR

Plaintiffs/Counterdefendants, )

v. )

PUBLIC.RESOURCE.ORG, INC., )

Defendant/Counterclaimant. )

**JOINT STIPULATION AND PROPOSED ORDER TO EXTEND THE DATE ON  
WHICH EXPERT DEPOSITION MAY BE TAKEN**

**STIPULATION**

Counsel for Defendant Public.Resource.Org (“Public Resource”) and Plaintiffs American Educational Research Association, Inc. (“AERA”), American Psychological Association, Inc. (“APA”), and the National Council on Measurement in Education, Inc. (“NCME”) hereby enter into the following Stipulation, and respectfully request the Court’s approval of the Proposed Order.

1. The parties stipulate that the deadline for the deposition of Plaintiffs’ expert witness Dr. Phillips shall be extended to allow the deposition to be completed on September 22, 2015 in Phoenix, AZ.

2. The parties agree that this deposition schedule allows the parties to conduct this deposition in a reasonable manner while accommodating the witness’ and counsels’ various schedules.

3. Fact discovery in this action closed on May 18, 2015. The parties further agree that the closing date for all other expert discovery to be taken in this action remains as September 11, 2015, as directed by the Court's Order of June 11, 2015 (Dkt. 53).

**IT IS SO STIPULATED.**

Dated: September 9, 2015

FENWICK & WEST LLP

By: /s/ Matthew B. Becker  
Andrew P. Bridges  
Matthew B. Becker

DAVID HALPERIN  
David Halperin

ELECTRONIC FRONTIER FOUNDATION  
Corynne McSherry  
Mitchell L. Stoltz

Attorneys for Defendant  
PUBLIC.RESOURCE.ORG

Dated: September 9, 2015

QUARLES & BRADY LLP

By: /s/ Jonathan Hudis  
Jonathan Hudis

OBLON, MCCLELLAND, MAIER &  
NEUSTADT, LLP

Kathleen Cooney-Porter  
Katherine Cappaert

Attorneys for Plaintiffs  
AMERICAN EDUCATIONAL RESEARCH  
ASSOCIATION, INC., AMERICAN  
PSYCHOLOGICAL ASSOCIATION, INC., and  
NATIONAL COUNCIL ON MEASUREMENT  
IN EDUCATION, INC.

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

AMERICAN EDUCATIONAL RESEARCH  
ASSOCIATION, INC., AMERICAN  
PSYCHOLOGICAL ASSOCIATION, INC. and  
NATIONAL COUNCIL ON MEASUREMENT IN  
EDUCATION, INC.

Plaintiffs/Counterdefendants,

v.

PUBLIC.RESOURCE.ORG, INC.,

Defendant/Counterclaimant.

Case No. 1:14-cv-00857-TSC-DAR

**[PROPOSED] ORDER GRANTING  
JOINT STIPULATION TO EXTEND  
THE DATE ON WHICH EXPERT  
DEPOSITION MAY BE TAKEN  
(DKT. NO. 55)**

Having fully considered the Joint Stipulation to Extend the Date on Which Expert  
Deposition May Be Taken (Dkt. 55), and for good cause shown, it is hereby

**ORDERED** that the Joint Stipulation to Extend the Date on Which the Deposition of  
Plaintiffs' expert witness Dr. Phillips may be taken (Dkt. 55) is **GRANTED**, and it is further

**ORDERED** that the date by which the deposition of Plaintiffs' expert witness Dr.  
Phillips may be taken is extended to September 22, 2015, and it is further

**ORDERED** that the closing date for all other expert discovery to be taken in this action  
remains as September 11, 2015, as directed by the Court's Order of June 11, 2015 (Dkt. 53).

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

\_\_\_\_\_  
Hon. Deborah A. Robinson  
United States Magistrate Judge