

UNITED STATES DISTRICT COURT
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

MOTION TO ADMIT SEBASTIAN E. KAPLAN *PRO HAC VICE*

Pursuant to Local Civil Rule 83.2(d), MITCHELL L. STOLTZ, counsel for Defendant Public.Resource.org in this matter, and a member in good standing of the bar of this Court, respectfully moves this Court for an Order admitting Sebastian E. Kaplan as counsel *pro hac vice*. Mr. Kaplan is a member in good standing of the Bar of California and an Associate at Fenwick & West LLP, located at 555 California Street, 12th Floor, San Francisco, California 94104.

Accompanying this Motion is Mr. Kaplan's declaration containing the information required for *pro hac vice* motions pursuant to Local Civil Rule 83.2(d). Counsel for Defendant has conferred with counsel for the Plaintiffs concerning this motion as required by Local Civil Rule 7(m). Plaintiffs consent to the *pro hac vice* motion. In accordance with Local Civil Rule 7(c), a proposed order is filed herewith.

Dated: January 13, 2016

Respectfully submitted,

/s/ Mitchell L. Stoltz

Mitchell L. Stoltz (D.C. Bar No. 978149)
mitch@eff.org
ELECTRONIC FRONTIER FOUNDATION
815 Eddy Street
San Francisco, CA 94109
Telephone: (415) 436-9333
Facsimile: (415) 436-9993