

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

AMERICAN EDUCATIONAL RESEARCH
ASSOCIATION, INC.;

AMERICAN PSYCHOLOGICAL
ASSOCIATION, INC.; and

NATIONAL COUNCIL OF MEASUREMENT IN
EDUCATION, INC.,

Plaintiffs,

v.

PUBLIC.RESOURCE.ORG, INC.,

Defendant

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

**UNOPPOSED MOTION FOR
LEAVE TO FILE AMICUS
CURIAE BRIEF IN SUPPORT
OF DEFENDANT**

Action Filed: May 23, 2014

Sina Bahram respectfully moves for leave to file an amicus curiae brief in support of Defendant in the above-captioned matter. The proposed brief is attached to this motion.

Mr. Bahram is a digital accessibility researcher and advocate and chief technology officer and co-founder of the International Association of Visually Impaired Technologists (“IAVIT”). In addition to researching human computer interaction, intelligent user interfaces, and artificial intelligence with the goal of helping users with disabilities, Mr. Bahram advocates on behalf of disabled individuals and organizations representing their interests. Mr. Bahram has authored numerous publications advocating for technical solutions to accessibility challenges, *see* Sina Bahram, *Publications*, <https://www.sinabahram.com/publications.php> (last visited Feb. 11, 2016), and has been honored by the White House as a “Champion of Change” for his accessibility work. *See* Matt Shipman, *White House Honors Sina Bahram as a “Champion of Change,”* CSC News (May 7, 2012), <http://www.csc.ncsu.edu/news/1322>; The White House, *Champions of Change: Sina Bahram*, <https://www.whitehouse.gov/champions/stem-equality-for->

americans-with-disabilities/sina-bahram- (last visited Feb. 11, 2016). Additionally, Mr. Bahram serves on several boards of conferences and organizations related to accessibility and, through his consulting service Prime Access Consulting, works with clients to achieve digital accessibility goals. *See* Sina Bahram, *Consulting*, <https://www.sinabahram.com/consulting.php> (last visited Feb. 11, 2016).

As a visually-impaired individual himself and in his capacity as an advocate for other disabled persons, Mr. Bahram has a substantial interest in this case, which is likely to have a profound effect on the ability of persons with disabilities to access, understand, and participate in the development of the law. Disabled individuals like Mr. Bahram and those for whom he advocates are acutely affected by changes in public safety or accessibility law—changes that may, as in this case, incorporate standards crafted by standards development organizations (“SDOs”). Defendant’s Statement of Material Facts (“DSMF”) ¶¶ 20, 21. When SDOs fail to provide accessible versions of incorporated standards, they prevent millions of disabled individuals from reading the laws that govern them. As an expert on, an advocate for, and a user of accessibility technologies, Mr. Bahram is particularly well-positioned to explain these problems and the potential impact of this case on disabled individuals.

This Court has allowed amicus curiae participation when the amicus “has unique information or perspective that can help the court beyond the help that the lawyers for the parties are able to provide.” *Jin v. Ministry of State Sec.*, 557 F. Supp. 2d 131, 137 (D.D.C. 2008) (quoting *Ryan v. Commodity Futures Trading Comm’n*, 125 F.3d 1062, 1064 (7th Cir. 1997)); *Cobell v. Norton*, 246 F. Supp. 2d 59, 62 (D.D.C. 2003). Too often, policymakers overlook the impact of the law upon disabled persons, and fail to consider their needs. Mr. Bahram’s unique perspective as an advocate for and expert on accessibility technology will help the Court to

understand the implications of this case for an important and vulnerable segment of the population.

The Parties have agreed that they will not oppose any amicus filing in support of either side. *See* Joint Report on Proposed Summary Judgment Briefing Schedule at 3, Docket No. 58 (Oct. 30, 2015).

DATED: February 11, 2016

Respectfully Submitted,



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