

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

<p>AMERICAN SOCIETY FOR TESTING AND MATERIALS d/b/a/ ASTM INTERNATIONAL;</p> <p>NATIONAL FIRE PROTECTION ASSOCIATION, INC.; and</p> <p>AMERICAN SOCIETY OF HEATING, REFRIGERATING, AND AIR CONDITIONING ENGINEERS,</p> <p style="text-align: center;">Plaintiffs/ Counter-Defendants,</p> <p>v.</p> <p>PUBLIC.RESOURCE.ORG, INC.,</p> <p style="text-align: center;">Defendant/ Counter-Plaintiff.</p>	<p style="text-align: center;">Case No. 1:13-cv-01215-TSC</p>
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PLAINTIFFS’ MOTION FOR LEAVE TO FILE DOCUMENTS UNDER SEAL

Pursuant to Civil Local Rule 5.1(h), Plaintiffs/Counter-Defendants American Society for Testing and Materials d/b/a ASTM International (“ASTM”), National Fire Protection Association, Inc. (“NFPA”), and American Society of Heating, Refrigerating, and Air Conditioning Engineers (“ASHRAE”) (collectively, “Plaintiffs”) respectfully move to file under seal Exhibits 1 and 3 attached to the Declaration of Jordana S. Rubel (“Rubel Declaration”) in support of Plaintiffs’ Motion for Summary Judgment and for a Permanent Injunction.

Plaintiffs request that the foregoing exhibits be filed under seal because they are documents that were designated “Confidential” pursuant to the Stipulated Protective Order in this action (Dkt. 44) and produced by Plaintiffs to Public.Resource.Org, Inc. (“Public Resource”). Section 2 of the Stipulated Protective Order requires that these confidential documents be filed under seal. The documents that Plaintiffs request to file under seal are:

- Exhibit 1 to the Rubel Declaration, which includes the Expert Report of John C. Jarosz.
- Exhibit 3 to the Rubel Declaration, which includes excerpts of the deposition of Carl Malamud, which took place on February 27, 2015 and was designated confidential.

For the foregoing reasons, Plaintiffs respectfully request that the Court issue an Order granting Plaintiffs' Motion to File Documents Under Seal. A proposed Order is attached.

Dated: November 19, 2015

Respectfully submitted,

/s/ J. Kevin Fee

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Motion for Leave to File Documents Under Seal was served this 19th day of November, 2015 via CM/ECF upon the following:

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