

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

AMERICAN SOCIETY FOR TESTING
AND MATERIALS d/b/a ASTM
INTERNATIONAL;

NATIONAL FIRE PROTECTION
ASSOCIATION, INC.; and

AMERICAN SOCIETY OF HEATING,
REFRIGERATING, AND AIR
CONDITIONING ENGINEERS,

Plaintiffs-Counterdefendants,

v.

PUBLIC.RESOURCE.ORG, INC.,

Defendant-Counterclaimant.

Case No. 1:13-cv-01215-TSC-DAR

**MOTION OF THE REPORTERS COMMITTEE FOR FREEDOM OF THE PRESS FOR
LEAVE TO FILE BRIEF AS *AMICUS CURIAE* IN SUPPORT OF DEFENDANT-
COUNTERCLAIMANT'S MOTION FOR SUMMARY JUDGMENT AND IN
OPPOSITION TO PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT AND FOR A
PERMANENT INJUNCTION**

The Reporters Committee for Freedom of the Press (“Reporters Committee”) hereby requests permission to submit the attached brief as *amicus curiae* in support of Defendant-Counterclaimant’s motion for summary judgment and in opposition to Plaintiffs-Counterdefendants’ motion for summary judgment and for a permanent injunction. The Reporters Committee is an unincorporated nonprofit association of reporters and editors dedicated to safeguarding the First Amendment rights and freedom of information interests of

the news media and the public. The Reporters Committee has provided assistance, guidance, and research in First Amendment and freedom of information litigation since 1970.

The Reporters Committee submits the attached brief to aid the Court in understanding the First Amendment and freedom of information issues raised by the current litigation from the viewpoint of the news media. The Reporters Committee seeks to explain to the Court how a scenario under which citizens must pay money to obtain access to standards incorporated by reference raises important public policy questions that implicate the First Amendment and Freedom of Information Act.

The Reporters Committee has informed all parties to this matter of its intent to submit the attached brief. Defendant-Counterclaimant has consented to its filing. Plaintiffs-Counterdefendants have no objection to its filing.

For the foregoing reasons, the Reporters Committee respectfully requests leave to file the attached brief.

Dated: January 11, 2016

/s/ Bruce D. Brown
Bruce D. Brown (D.C. Bar No. 57317)
THE REPORTERS COMMITTEE
FOR FREEDOM OF THE PRESS
1156 15th St. NW, Ste. 1250
Washington, D.C. 20005
Telephone: (202) 795-9303
Email: bbrown@rcfp.org

CERTIFICATE OF SERVICE

I hereby certify that on January 11, 2016, the foregoing document was filed electronically with the Clerk of the Court through the Court's CM/ECF system, which will automatically serve all counsel of record.

Dated: January 11, 2016

/s/ Bruce D. Brown

Bruce D. Brown (D.C. Bar No. 57317)

THE REPORTERS COMMITTEE

FOR FREEDOM OF THE PRESS

1156 15th St. NW, Ste. 1250

Washington, D.C. 20005

Telephone: 202.795.9303

Email: bbrown@rcfp.org

Counsel for Amicus Curiae