

**IN THE 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

**DECLARATION OF ANDREW P.
BRIDGES IN SUPPORT OF
DEFENDANT
PUBLIC.RESOURCE.ORG, INC.'S
REPLY IN SUPPORT OF MOTION TO
COMPEL DISCOVERY**

I, Andrew P. Bridges, hereby declare pursuant to 28 U.S.C. § 1746 as follows:

1. I am an attorney duly licensed to practice law in the State of California and admitted to practice before this Court. I am a partner in the law firm of Fenwick & West LLP and counsel of record for Defendant-Counterclaimant Public.Resource.Org, Inc. ("Public Resource"). I submit this declaration in support of Public Resource's Reply in Support of its Motion to Compel Discovery. I make the following statements based on personal knowledge and, if called as a witness, could competently testify regarding each of these statements.

2. A copy of the letter dated October 10, 2014 from Plaintiff American Society of Heating, Refrigerating, and Air Conditioning Engineers' ("ASHRAE") counsel Andrew Zee to Public Resource's counsel Kathleen Lu is **Exhibit 1**. In this letter, Mr. Zee responds to Public Resource's October 8, 2014 letter and notifies Public Resource of ASHRAE's intent to produce documents by October 17, 2014.

3. A copy of the letter dated October 13, 2014 from the American Society for Testing and Materials' ("ASTM") counsel Kevin Fee to me as Public Resource's counsel in response to Public Resource's September 24, 2014 and October 8, 2014 letters, is **Exhibit 2**. In this letter, Mr. Fee raises issues relating to search terms, custodians and the parties' document production.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 13th day of October 2014.

/s/ Andrew P. Bridges

Andrew P. Bridges