

**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, INC.

Plaintiffs/Counter-defendants,

v.

PUBLIC.RESOURCE.ORG, INC.,

Defendant/Counterclaimant.

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

**DECLARATION OF ANDREW P.  
BRIDGES IN SUPPORT OF  
PUBLIC.RESOURCE.ORG, INC.'S  
MOTION FOR PROTECTIVE ORDER**

Filed: August 6, 2013

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

1. I am a member of the bar of the State of California and am 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 Motion for Protective Order.

2. On January 26, 2015, Public Resource received a second set of requests for production of documents from the AERA Plaintiffs in the AERA Case, Case No. 1:14-cv-00857-TSC-DAR. These requests for production included requests for "responses to all sets of Requests for Production of Documents and Things served by the ASTM Plaintiffs in the ASTM case," "responses to all sets of Requests for Admissions served by the ASTM Plaintiffs in the ASTM case," and "all transcripts and exhibits from any depositions taken in the ASTM Case." A

copy of the AERA Plaintiffs' second set of requests for production of documents is **Exhibit A** to this declaration.

I declare under penalty of perjury that the foregoing is true and correct. Executed on February 20, 2015.

/s/Andrew P. Bridges  
Andrew P. Bridges