

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

CODE REVISION COMMISSION on
behalf of and for the benefit of THE
GENERAL ASSEMBLY OF
GEORGIA, and THE STATE OF
GEORGIA,

Plaintiff,

v.

PUBLIC.RESOURCE.ORG, INC.

Defendant.

CIVIL ACTION NO.

1:15-CV-02594-MHC

**PLAINTIFF COMMISSION'S
SECOND SET OF INTERROGATORIES (Nos. 7-10)**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, the Local Rules of the United States District Court for the Northern District of Georgia, and in accordance with this Court's Scheduling Order (*see* Dkt. No. 013), Plaintiff Code Revision Commission on Behalf of and For the Benefit of the General Assembly of Georgia and the State of Georgia ("Commission"), by and through its attorneys, hereby requests that Defendant Public.Resource.Org, Inc. ("Public.Resource") answer the following Second Set of Interrogatories ("Interrogatories") fully in writing, under oath, unless the interrogatory is objected to, in which event Public.Resource shall state the reason for objection and shall

answer to the extent the interrogatory is not objectionable. The answers shall be served within thirty (30) days after service.

Each interrogatory set forth below is addressed to the knowledge of Public.Resource, as well as to the knowledge, information, and documents in the possession, custody, or control of Public.Resource's attorneys, accountants, agents, employees, officers, directors, investigators, consultants, and other representatives. Thus, when an interrogatory is directed to Public.Resource, it is also directed to Carl Malamud as an officer of Public.Resource and to each of the other above-described persons.

DEFINITIONS

The Commission incorporates herein by reference the Definitions set forth in Plaintiff Commission's First Set of Interrogatories (Nos. 1-6), served on January 15, 2016.

INSTRUCTIONS

The Commission incorporates herein by reference the Instructions set forth in Plaintiff Commission's First Set of Interrogatories (Nos. 1-6), served on January 15, 2016.

INTERROGATORIES

INTERROGATORY NO. 7: Identify the number of times a user has accessed each O.C.G.A. volume or supplement on the website <https://law.resource.org>.

INTERROGATORY NO. 8: Identify the number of times a user has accessed each O.C.G.A. volume or supplement on the website www.archive.org.

INTERROGATORY NO. 9: Identify the type (e.g., a PDF access, a .xml access) of downloads and/or accesses of each O.C.G.A. volume and supplement from the website <https://law.resource.org>.

INTERROGATORY NO. 10: Identify the type (e.g., a PDF access, a .xml access) of downloads and/or accesses of each O.C.G.A. volume and supplement from the website www.archive.org.

January 19, 2016




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*Counsel for the Plaintiff, Code Revision
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benefit of the General Assembly of
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CERTIFICATE OF SERVICE

I certify that on Tuesday, January 19, 2016, the foregoing **Plaintiff Commission's Second Set of Interrogatories (Nos. 7 - 10)** was served on counsel for Defendant Public.Resource.Org by hand at the address listed below.

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