

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

)	
CODE REVISION COMMISSION)	
on Behalf of and For the Benefit of the)	CIVIL ACTION
GENERAL ASSEMBLY OF GEORGIA,)	NO. 1:15-cv-2594-MHC
and the STATE OF GEORGIA,)	
)	
Plaintiff,)	
)	
v.)	
)	
PUBLIC.RESOURCE.ORG, INC.,)	
)	
Defendant.)	

**DEFENDANT PUBLIC.RESOURCE.ORG, INC.’S RESPONSES AND
OBJECTIONS TO PLAINTIFF CODE REVISION COMMISSION’S
SECOND SET OF INTERROGATORIES**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure (the “Federal Rules”), Defendant Public.Resource.Org, Inc. (“Public.Resource”) hereby responds to the interrogatories contained in Plaintiff Code Revision Commission’s (“Commission” or “Plaintiff”) Second Set of Interrogatories to Public.Resource as follows:

GENERAL OBJECTIONS

Public.Resource incorporates herein by reference its General Objections set forth in Defendant Public.Resource's Objections and Response to Plaintiff's First Set of Interrogatories, served on February 16th, 2016.

SPECIFIC OBJECTIONS AND RESPONSES

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>.*

ANSWER TO INTERROGATORY NO. 7

Public.Resource objects to this request as duplicative and cumulative of Interrogatory No. 2. Public.Resource further objects to this request as seeking confidential information to the extent it seeks the server logs for <https://law.resource.org>, which contain the confidential information of third parties and are not necessary to identify the information requested in this Interrogatory. Subject to and without waiving the foregoing general and specific objections, Public.Resource produced on February 16th, 2016, along with its objections and responses to Plaintiff's First Requests for Production, non-privileged documents identified by the Bates range PRO-000632 to PRO-000644 sufficient to identify the number of times a user has accessed each O.C.G.A. volume or supplement on the website <https://law.resource.org>. Public.Resource reserves the right to supplement these responses as its investigation and discovery continues.

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.*

ANSWER TO INTERROGATORY NO. 8:

Public.Resource objects to this request as duplicative and cumulative of Interrogatory No. 2. Public.Resource further objects to this request as seeking confidential information to the extent it seeks the server logs for www.archive.org, which contain the confidential information of third parties and are not necessary to identify the information requested in this Interrogatory. Public.Resource produced on February 16th, 2016 along with its objections and responses to Plaintiff's First Requests for Production, non-privileged documents identified by the Bates range PRO-000616 to PRO-000621 sufficient to identify the number of times a user has accessed each O.C.G.A. volume or supplement on the website www.archive.org. Public.Resource reserves the right to supplement these responses as its investigation and discovery continues.

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 supplements from the website <https://law.resource.org>.*

ANSWER TO INTERROGATORY NO. 9:

Public.Resource objects to this request as duplicative and cumulative of Interrogatory No. 2. Public.Resource further objects to this request as seeking

confidential information to the extent it seeks the server logs for <https://law.resource.org>, which contain the confidential information of third parties and are not necessary to identify the information requested in this Interrogatory. Subject to and without waiving the foregoing general and specific objections, Public.Resource produced on February 16th, 2016, along with its objections and responses to Plaintiff's First Requests for Production, non-privileged documents identified by the Bates range PRO-000632 to PRO-000644 sufficient to identify the type of downloads and/or access of each O.C.G.A. volume and supplement from the website <https://law.resource.org> at a mutually agreeable time and place. Public.Resource reserves the right to supplement these responses as its investigation and discovery continues.

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 supplements from the website www.archive.org.*

ANSWER TO INTERROGATORY NO. 10:

Public.Resource objects to this request as duplicative and cumulative of Interrogatory No. 2. Public.Resource further objects to this request as seeking confidential information to the extent it seeks the server logs for www.archive.org, which contain the confidential information of third parties and are not necessary to identify the information requested in this Interrogatory. Subject to and without

waiving the foregoing general and specific objections, Public.Resource produced on February 16th, 2016, concurrent with its objections and responses to Plaintiff's First Requests for Production, non-privileged documents identified by the Bates range PRO-000616 to PRO-000621 sufficient to identify the type of downloads and/or access of each O.C.G.A. volume and supplement from the website www.archive.org at a mutually agreeable time and place. Public.Resource reserves the right to supplement these responses as its investigation and discovery continues.

Respectfully submitted,

By: /s/ Sarah P. LaFantano
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VERIFICATION

I, CARL MALAMUD, am President and Founder of Public.Resource.Org, Inc. I have read *Defendant Public.Resource.Org, Inc.'s Responses and Objections to Plaintiff Code Revision Commission's Second Set of Interrogatories*, and know the contents thereof. The responses are true and correct to the best of my information, knowledge, and belief formed after a reasonable inquiry.

Executed on the 17th day of February 2016.

/s/ CARL MALAMUD
CARL MALAMUD

CERTIFICATE OF SERVICE

I hereby certify that the foregoing “Defendant Public.Resource.Org, Inc.’s Responses and Objections to Plaintiff Code Revision Commission’s Second Set of Interrogatories” were served on Plaintiff by sending a copy of same through UPS Overnight to Plaintiff’s counsel at the following address and a courtesy copy via e-mail to:

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This 17th day of February, 2016,

By: /s/ Sarah P. LaFantano
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