

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)	
GENERAL ASSEMBLY OF GEORGIA,)	CIVIL ACTION
and the STATE OF GEORGIA,)	NO. 1:15-cv-2594-MHC
)	
Plaintiff,)	
)	
v.)	
)	
PUBLIC.RESOURCE.ORG, INC.,)	
)	
Defendant.)	

**DEFENDANT PUBLIC.RESOURCE.ORG, INC.’S RESPONSES AND
OBJECTIONS TO PLAINTIFF CODE REVISION COMMISSION’S FIRST
REQUESTS FOR PRODUCTION OF DOCUMENTS**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure (the “Federal Rules”), Defendant Public.Resource.Org, Inc. (“Public.Resource”) responds to the document requests contained in Plaintiff Code Revision Commission’s (“Commission” or “Plaintiff”) First Requests for Production of Documents (“First RFPs”) to Public.Resource as follows:

GENERAL OBJECTIONS

Public.Resource incorporates by reference and reasserts as if fully set forth herein each and every General Objection contained in Public.Resource's Responses and Objections to Plaintiff's First Set of Interrogatories.

Without waiving or limiting in any manner any of its General Objections, but rather incorporating such objections into each of the following responses to the extent applicable, Public.Resource responds to the specific document requests contained in Plaintiff's First RFPs as follows:

SPECIFIC OBJECTIONS AND RESPONSES

REQUEST NO. 1: *All documents relating to the O.C.G.A., excluding the O.C.G.A. volumes and supplements posted on Public.Resource's website <https://law.resource.org> and/or on the website www.archive.org.*

ANSWER TO REQUEST NO. 1:

Public.Resource objects to this request as vague, overly broad and unduly burdensome to the extent it requests "all documents relating" to the O.C.G.A. Public.Resource further objects to this request to the extent that it requests documents protected from disclosure by the attorney/client privilege, attorney work product doctrine, or any other applicable privilege or immunity. Subject to and without waiving the foregoing general and specific objections, Public.Resource herewith produces non-privileged documents relating to

Public.Resource's posting of the O.C.G.A. volumes and supplements relevant to this action in its possession, custody or control responsive to this Request. Public.Resource reserves the right to supplement these responses as its investigation and discovery continues.

REQUEST NO. 2: *All documents relating to the State of Georgia, the General Assembly of the State of Georgia or the Code Revision Commission of the State of Georgia.*

ANSWER TO REQUEST NO. 2:

Public.Resource objects to this request as vague, overly broad and unduly burdensome to the extent it requests "all documents relating" to the "State of Georgia, the General Assembly of the State of Georgia or the Code Revision Commission of the State of Georgia." Public.Resource further objects to this request to the extent that it requests documents protected from disclosure by the attorney/client privilege, attorney work product doctrine, or any other applicable privilege or immunity. Subject to and without waiving the foregoing general and specific objections, Public.Resource produces herewith non-privileged documents relevant to this action in its possession, custody or control responsive to this Request. Public.Resource reserves the right to supplement these responses as its investigation and discovery continues.

REQUEST NO. 3: *Documents sufficient to show Public.Resource's non-profit entity status at the times it copied the O.C.G.A.*

ANSWER TO REQUEST NO. 3:

Subject to and without waiving the foregoing general objections, Public.Resource produces herewith non-privileged documents in its possession, custody or control sufficient to establish Public.Resource's non-profit entity status. Public.Resource reserves the right to supplement these responses as its investigation and discovery continues.

REQUEST NO. 4: *Documents sufficient to identify all of Public.Resource's officers, directors, employees, and board members between 2010 and present.*

ANSWER TO REQUEST NO. 4:

Subject to and without waiving the foregoing general objections, Public.Resource produces herewith responsive, non-privileged documents in its possession, custody, or control at a mutually agreeable time and place. Public.Resource reserves the right to supplement these responses as its investigation and discovery continues.

REQUEST NO. 5: *Carl Malamud's publication titled 10 Rules for Radicals.*

ANSWER TO REQUEST NO. 5:

Subject to and without waiving the foregoing general objections, Public.Resource produces herewith a copy of Carl Malamud's *10 Rules for Radicals*.

REQUEST NO. 6: *All documents identified in Public.Resource's responses to all interrogatories or used, relied on, or considered by Public.Resource in drafting its response to interrogatories.*

ANSWER TO REQUEST NO. 6:

Subject to and without waiving the foregoing general objections, Public.Resource produces herewith non-privileged documents in its possession, custody or control responsive to this Request at a mutually agreeable date and time. 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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CERTIFICATE OF SERVICE

I hereby certify that the foregoing “Defendant Public.Resource.Org, Inc.’s Responses and Objections to Plaintiff Code Revision Commission’s First Requests for Production of Documents” 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 16th day of February, 2016,

By: /s/ Sarah P. LaFantano
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