

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
SECOND 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”) hereby responds to the document requests contained in Plaintiff Code Revision Commission’s (“Commission” or “Plaintiff”) Second Requests for Production of Documents (“Second 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, served on February 16th, 2016.

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 Second RFPs as follows:

SPECIFIC OBJECTIONS AND RESPONSES

REQUEST NO. 7: *Documents relating to usage reports regarding users accessing the O.C.G.A. on the website <https://law.resource.org>.*

ANSWER TO REQUEST 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. Subject to and without waiving the foregoing general and specific objections, Public.Resource produced on February 16th, 2016, along with its responses and objections to Plaintiff's First Request for Production of Documents, non-privileged documents in its possession, custody or control sufficient to identify the number and type of downloads and/or accesses of the O.C.G.A. volumes and supplements from the website <https://law.resource.org> from the date of posting to

the present. Public.Resource reserves the right to supplement these responses as its investigation and discovery continues.

REQUEST NO. 8: *Documents relating to usage reports regarding users accessing the O.C.G.A. on the website www.archive.org.*

ANSWER TO REQUEST 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 responses and objections to Plaintiff's First Request for Production of Documents, non-privileged documents in its possession, custody or control sufficient to identify the number and type of downloads and/or accesses of the O.C.G.A. volumes and supplements from the website www.archive.org from the date of posting to the present. Public.Resource reserves the right to supplement these responses as its investigation and discovery continues.

REQUEST NO. 9: *Documents that identify the number and type (e.g., a PDF access, a .xml access) of downloads and/or accesses of O.C.G.A. volumes and*

supplements from the website <https://law.resource.org> from the date of said volume or supplement posting to the present.

ANSWER TO REQUEST NO. 9:

Public.Resource objects to this request as duplicative and cumulative of Interrogatory No. 2. Subject to and without waiving the foregoing general and specific objections, Public.Resource produced on February 16th, 2016, along with its responses and objections to Plaintiff's First Request for Production of Documents, non-privileged documents in its possession, custody or control sufficient to identify the number and type of downloads and/or accesses of the O.C.G.A. volumes and supplements from the website <https://law.resource.org> from the date of posting to the present. Public.Resource reserves the right to supplement these responses as its investigation and discovery continues.

REQUEST NO. 10: *Documents that identify the number and type (e.g., a PDF access, a .xml access) of downloads and/or accesses of O.C.G.A. volumes and supplements from the website www.archive.org from the date of said volume or supplement posting to the present.*

ANSWER TO REQUEST NO. 10:

Public.Resource objects to this request as duplicative and cumulative of Interrogatory No. 2. Subject to and without waiving the foregoing general and specific objections, Public.Resource produced on February 16th, 2016, along with

its responses and objections to Plaintiff's First Request for Production of Documents, non-privileged documents in its possession, custody or control sufficient to identify the number and type of downloads and/or accesses of the O.C.G.A. volumes and supplements from the website www.archive.org from the date of posting to the present. Public.Resource reserves the right to supplement these responses as its investigation and discovery continues.

Respectfully submitted,

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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 Second 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 17th day of February, 2016,

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