

**IN THE 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,

Plaintiffs/Counter-defendants,

v.

PUBLIC.RESOURCE.ORG, INC.,

Defendant/Counterclaimant.

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

**PUBLIC.RESOURCE.ORG, INC.'S
NOTICE OF FILING WITH PROPOSED
ORDER REGARDING THE SCHEDULE
FOR COMPLETION OF DISCOVERY**

Filed: August 6, 2013

Public.Resource.Org hereby provides notice to the Court of the attached proposed order, in response to the Court's Orders of June 10 and June 16, 2015. Public Resource has met and conferred with Plaintiffs on three occasions in the past week-and-a-half and exchanged numerous emails in an effort to reach an agreement. Public Resource has also offered Plaintiffs an additional one to two weeks to take the deposition of Public Resource's expert, whose deposition Plaintiffs noticed only this afternoon, but Plaintiffs have declined that offer. Accordingly, the proposed order is attached.

Dated: June 24, 2015

Respectfully submitted,

/s/ Andrew P. Bridges

Andrew P. Bridges (admitted)
abridges@fenwick.com
Kathleen Lu (pro hac vice)
klu@fenwick.com
Matthew B. Becker (pro hac vice)
mbecker@fenwick.com
FENWICK & WEST LLP
555 California Street, 12th Floor
San Francisco, CA 94104
Telephone: (415) 875-2300
Facsimile: (415) 281-1350

David Halperin (D.C. Bar No. 426078)
davidhalperindc@gmail.com
1530 P Street NW
Washington, DC 20005
Telephone: (202) 905-3434

Mitchell L. Stoltz (D.C. Bar No. 978149)
mitch@eff.org
Corynne McSherry (pro hac vice)
corynne@eff.org
ELECTRONIC FRONTIER FOUNDATION
815 Eddy Street
San Francisco, CA 94109
Telephone: (415) 436-9333
Facsimile: (415) 436-9993

*Attorneys for Defendant-Counterclaimant
Public.Resource.Org, Inc.*