

**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-Counterdefendants,

v.

PUBLIC.RESOURCE.ORG, INC.,

Defendant-Counterclaimant.

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

**MOTION OF THE REPORTERS COMMITTEE FOR FREEDOM OF THE PRESS FOR  
LEAVE TO FILE BRIEF AS *AMICUS CURIAE* IN SUPPORT OF DEFENDANT-  
COUNTERCLAIMANT'S MOTION FOR SUMMARY JUDGMENT AND IN  
OPPOSITION TO PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT AND FOR A  
PERMANENT INJUNCTION**

The Reporters Committee for Freedom of the Press ("Reporters Committee") hereby requests permission to submit the attached brief as *amicus curiae* in support of Defendant-Counterclaimant's motion for summary judgment and in opposition to Plaintiffs-Counterdefendants' motion for summary judgment and for a permanent injunction. The Reporters Committee is an unincorporated nonprofit association of reporters and editors dedicated to safeguarding the First Amendment rights and freedom of information interests of

the news media and the public. The Reporters Committee has provided assistance, guidance, and research in First Amendment and freedom of information litigation since 1970.

The Reporters Committee submits the attached brief to aid the Court in understanding the First Amendment and freedom of information issues raised by the current litigation from the viewpoint of the news media. The Reporters Committee seeks to explain to the Court how a scenario under which citizens must pay money to obtain access to standards incorporated by reference raises important public policy questions that implicate the First Amendment and Freedom of Information Act.

The Reporters Committee has informed all parties to this matter of its intent to submit the attached brief. Defendant-Counterclaimant has consented to its filing. Plaintiffs-Counterdefendants have no objection to its filing.

For the foregoing reasons, the Reporters Committee respectfully requests leave to file the attached brief.

Dated: January 11, 2016

/s/ Bruce D. Brown  
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Bruce D. Brown (D.C. Bar No. 57317)  
THE REPORTERS COMMITTEE  
FOR FREEDOM OF THE PRESS  
1156 15th St. NW, Ste. 1250  
Washington, D.C. 20005  
Telephone: (202) 795-9303  
Email: [bbrown@rcfp.org](mailto:bbrown@rcfp.org)

**CERTIFICATE OF SERVICE**

I hereby certify that on January 11, 2016, the foregoing document was filed electronically with the Clerk of the Court through the Court's CM/ECF system, which will automatically serve all counsel of record.

Dated: January 11, 2016

/s/ Bruce D. Brown

Bruce D. Brown (D.C. Bar No. 57317)

THE REPORTERS COMMITTEE

FOR FREEDOM OF THE PRESS

1156 15th St. NW, Ste. 1250

Washington, D.C. 20005

Telephone: 202.795.9303

Email: [bbrown@rcfp.org](mailto:bbrown@rcfp.org)

*Counsel for Amicus Curiae*