EXHIBIT B

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-Counterdefendants,

v.

PUBLIC.RESOURCE.ORG, INC.,

Defendant-Counterclaimant.

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

DECLARATION OF ANDREW P. BRIDGES IN SUPPORT OF DEFENDANT-COUNTERCLAIMANT PUBLIC.RESOURCE.ORG, INC.'S RESPONSE TO PLAINTIFFS' MOTION FOR PROTECTIVE ORDER

Action Filed: May 23, 2014

I, ANDREW P. BRIDGES, declare as follows:

- 1. I am an attorney duly licensed to practice law in the State of California (Cal. State Bar No. 122761) and admitted to practice before this Court. I am a partner in the law firm of Fenwick & West LLP, pro bono counsel for Defendant-Counterclaimant Public.Resource.Org, Inc. ("Public Resource"). I submit this declaration in support of Public Resource's Response to Plaintiffs' Motion for Protective Order. I make the following statements based on personal knowledge and, if called as a witness, could competently testify regarding each of these statements.
- 2. A copy of a model Stipulated Protective Order For Standard Litigation, approved for use by the U.S. District Court for the Northern District of California, is attached as **Exhibit 1**.
- 3. A copy of a Model Protective Order, approved for use by the U.S. District Court for the Western District of Washington, is attached as **Exhibit 2**.
 - 4. A copy of an Order Approving Stipulated Protective Order (Dkt. No. 42) Subject

To Stated Conditions, entered by the Hon. William Alsup on December 2, 2013 in the action captioned *Raymat Materials, Inc. v. A&C Catalysts, Inc.*, Case No. C 13-00567 WHA (N.D. Cal.), is attached as **Exhibit 3**.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 24th day of July 2014, in San Francisco, California.

/s/ Andrew P. Bridges
Andrew P. Bridges