

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

<p>AMERICAN SOCIETY FOR TESTING AND MATERIALS dba ASTM INTERNATIONAL; NATIONAL FIRE PROTECTION ASSOCIATION, INC.; and AMERICAN SOCIETY OF HEATING, REFRIGERATING, AND AIR CONDITIONING ENGINEERS,</p> <p style="text-align: center;">Plaintiffs/ Counter-Defendants,</p> <p style="text-align: center;">v.</p> <p>PUBLIC.RESOURCE.ORG, INC.,</p> <p style="text-align: center;">Defendant/ Counter-Plaintiff.</p>	<p>Case No. 1:13-cv-01215-TSC</p>
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CONSENT MOTION TO EXTEND TIME FOR DISCOVERY AND CASE SCHEDULE

Defendant/Counter-Plaintiff Public Resource, Inc. (“Public Resource”) respectfully moves to extend the fact discovery deadline and remaining deadlines on the case schedule, currently set by Dkt. No. 30, by two months. Pursuant to LCvR 7(m), the undersigned counsel discussed this motion with counsel for Plaintiffs/Counter-Defendants 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”). Plaintiffs consented to this Motion and agreed to the dates listed below.

Extending the deadlines by two months allows the parties to conduct substantial remaining discovery in an organized and timely fashion after this Court’s resolution of the pending protective order motion. Public Resource has discussed the schedule with Plaintiffs, and Plaintiffs agree to the below dates as a reasonable extension of the schedule.

Public Resource (with Plaintiffs’ agreement) respectfully asks that the Court modify the

remaining schedule as follows:

	Current Date	Proposed Date
Close of fact discovery	10/3/2014	12/05/2014
Joint status report	11/3/2014	1/5/2015
Opening expert disclosures	12/2/2014	2/2/2015
Opposition expert disclosures	1/16/2015	3/16/2015
Rebuttal expert disclosures	3/2/2015	5/4/2015
Reply expert disclosures	3/16/2015	5/18/2015
Close of expert discovery	4/16/2015	6/16/2015
Joint status report	4/23/2015	6/23/2015
Status conference	4/30/2015	At the Court's convenience

Exhibit A is a Proposed Order setting these dates.

Dated: August 15, 2014

Respectfully Submitted,

/s/ Andrew P. Bridges

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Plaintiffs' Consent Motion to Extend Discovery and Case Schedule was served this 15th day of August, 2014 via CM/ECF upon the following:

Counsel for Plaintiffs:

Jonathan H. Blavin

Jeffrey S. Bucholtz

Kenneth L. Steinthal

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J. Kevin Fee

Kelly Klaus

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/s/ Andrew P. Bridges
Andrew P. Bridges