

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

<p>AMERICAN SOCIETY FOR TESTING AND MATERIALS d/b/a/ ASTM INTERNATIONAL;</p> <p>NATIONAL FIRE PROTECTION ASSOCIATION, INC.; and</p> <p>AMERICAN SOCIETY OF HEATING, REFRIGERATING, AND AIR CONDITIONING ENGINEERS,</p> <p style="text-align: center;">Plaintiffs/ Counter-Defendants,</p> <p>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>
--	-----------------------------------

**DECLARATION OF NATHAN REHN
IN SUPPORT OF PLAINTIFFS' MOTION TO COMPEL**

I, Nathan Rehn, declare as follows:

1. I am an attorney at the law firm of Munger Tolles & Olson LLP, and am counsel for Plaintiff National Fire Protection Association, Inc. ("NFPA"). I was granted leave to appear pro hac vice in this matter on September 17, 2014. The following facts are based upon my own personal knowledge, and if called upon to do so, I could and would testify competently hereto.

2. On November 13, 2014, Plaintiffs American Society for Testing and Materials d/b/a/ ASTM International ("ASTM"), NFPA, and American Society of Heating, Refrigerating, and Air Conditioning Engineers ("ASHRAE") (collectively "Plaintiffs"), took a deposition pursuant to Rule 30(b)(6) of Point.B.Studios, whose designated witness was Rebecca Malamud (the "Malamud Deposition").

3. Attached hereto as Exhibit 1 is a true and correct copy of Exhibit 21 to the Malamud Deposition.

4. Attached hereto as Exhibit 2 is a true and correct copy of Defendant-Counterclaimant Public.Resource.Org, Inc.'s Responses to Plaintiff-Counterdefendants' First Set of Requests for Production of Documents.

5. Attached hereto as Exhibit 3 are pages excerpted from the transcript of the Malamud Deposition.

6. Attached hereto as Exhibit 4 is a true and correct copy of Exhibit 27 to the Malamud Deposition.

7. Attached hereto as Exhibit 5 is a true and correct copy of a chain of email correspondence between counsel for Plaintiffs and counsel for Public Resource regarding the issues raised in Plaintiffs' Motion to Compel.

8. Counsel for Plaintiffs met and conferred with counsel for Public Resource by telephone on December 5, 2014, and again on December 10, 2014, in an effort to reach common ground and resolve the issues raised in Plaintiffs' Motion to Compel. The parties were not able to resolve these issues.

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

Executed on December 24, 2014

/s/Nathan Rehn
Nathan Rehn