

Exhibit A

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

AMERICAN EDUCATIONAL RESEARCH)		
ASSOCIATION, INC., AMERICAN))	
PSYCHOLOGICAL ASSOCIATION, INC.,))	
and NATIONAL COUNCIL ON))	
MEASUREMENT IN EDUCATION, INC.,))	Civil Action No. 1:14-cv-00857-TSC-DAR
)	
Plaintiffs,))	PLAINTIFFS' SECOND REQUESTS
)	FOR PRODUCTION OF
v.))	DOCUMENTS, THINGS, AND
)	ELECTRONICALLY STORED
PUBLIC.RESOURCE.ORG, INC.,))	INFORMATION
)	
Defendant.))	
)	

Plaintiffs, American Educational Research Association, Inc. (“AERA”), American Psychological Association, Inc. (“APA”), and National Council on Measurement in Education, Inc. (“NCME”) (collectively, “Plaintiffs”), hereby request, pursuant to Fed. R. Civ. P. 34, that Defendant, Public.Resource.Org, Inc. (“Public Resource”), produce each document, thing, and item of electronically stored information (“ESI”) listed below for inspection and copying, and that said production be made accompanying Public Resource’s service of its responses to these Requests upon counsel for Plaintiffs at the offices of OBLON, McCLELLAND, MAIER & NEUSTADT, LLP, 1940 Duke Street, Alexandria, Virginia 22314.

DEFINITIONS AND INSTRUCTIONS

- A. The Definitions and Instructions contained in Plaintiffs’ Second Set of Interrogatories are incorporated herein by reference.

- B. The term “ASTM” refers to American Society of Testing and Materials d/b/a ASTM International.

- C. The term “NFPA” refers to National Fire Protection Association.

D. The term “ASHRAE” refers to American Society of Heating, Refrigerating, and Air Conditioning Engineers.

E. The term “the ASTM Case” refers to *American Society of Testing and Materials d/b/a ASTM International et al. v. Public.Resource.Org, Inc.*, Case No. 1:13-cv-01215-TSC-DAR.

F. The term “the ASTM Plaintiffs” refers collectively to the Plaintiffs in the ASTM Case.

G. With respect to each document, thing, and/or item of ESI requested below for which a claim of privilege, work product, confidentiality, or other rule or doctrine of non-disclosure is asserted, specify (in log form): (i) the nature of the document, thing, and/or item of ESI, (ii) the identity (by name, address, title, and business affiliation) of the author(s) thereof, (iii) the addressee(s) and all recipients thereof, (iv) the general subject matter to which the document, thing, and/or item of ESI relates, and its date, (v) the basis for non-disclosure being claimed and whether it is being asserted in connection with a claim or defense governed by state law, (vi) the non-disclosure rule or doctrine being invoked, and (vii) as to the document, thing, or item of ESI requested, whether any responsive materials exist.

H. Public Resource shall separately identify the Request by number pursuant to which each document, thing, and/or item of ESI is produced.

REQUESTS

PRODUCTION REQUEST NO. 10.

Produce Public Resource’s answers to all sets of interrogatories served by the ASTM Plaintiffs in the ASTM Case.

PRODUCTION REQUEST NO. 11.

Produce Public Resource's responses to all sets of Requests for Production of Documents and Things served by the ASTM Plaintiffs in the ASTM case.

PRODUCTION REQUEST NO. 12.

Produce Public Resource's responses to all sets of Requests for Admissions served by the ASTM Plaintiffs in the ASTM case.

PRODUCTION REQUEST NO. 13.

Produce all transcripts and exhibits from any depositions taken in the ASTM Case.

PRODUCTION REQUEST NO. 14.

Produce those documents, things and/or items of ESI relied upon by Public Resource in calculating how many times the 1999 Standards have been viewed on Public Resource's Website(s) from July 11, 2012 until the present day.

PRODUCTION REQUEST NO. 15.

Produce those documents, things and/or items of ESI relied upon by Public Resource in calculating how many times the 1999 Standards have been downloaded from Public Resource's Website(s) from July 11, 2012 until the present day.

PRODUCTION REQUEST NO. 16.

Produce those documents, things and/or items of ESI relied upon by Public Resource in calculating how many times the 1999 Standards have been accessed on Public Resource's Website(s) from July 11, 2012 until the present day.

PRODUCTION REQUEST NO. 17.

Produce those documents, things and/or items of ESI relied upon by Public Resource in calculating how many times HyperText Transfer Protocol (HTTP) requests for the file name

“aera.standards.1999.pdf” occurred on Public Resource’s Website(s) from July 11, 2012 until the present day.

PRODUCTION REQUEST NO. 18.

Produce those documents, things and/or items of ESI relied upon by Public Resource in calculating how many File Transfer Protocol (FTP) requests for the file name “aera.standards.1999.pdf” occurred on Public Resource’s Website(s) from July 11, 2012 until the present day.

PRODUCTION REQUEST NO. 19.

Produce those documents, things and/or items of ESI relied upon by Public Resource in calculating how many RSync (remote sync) protocol requests for the file name “aera.standards.1999.pdf” occurred on Public Resource’s Website(s) from July 11, 2012 until the present day.

PRODUCTION REQUEST NO. 20.

Produce those documents, things and/or items of ESI regarding Public Resource’s communications with any governmental agency regarding incorporation by reference.

PRODUCTION REQUEST NO. 21.

Produce those documents, things and/or items of ESI regarding Carl Malamud’s communications with any governmental agency on the topic of incorporation by reference.

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Respectfully submitted,

OBLON, McCLELLAND,
MAIER & NEUSTADT,LLP

Dated: January 26, 2015

{431384US; 11595055_1.DOCX}

/s/ Jonathan Hudis

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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing **PLAINTIFFS' SECOND REQUESTS FOR PRODUCTION OF DOCUMENTS, THINGS, AND ELECTRONICALLY STORED INFORMATION** was served on counsel for Defendant, this 26th day of January, 2015 by sending same via e-mail to:

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Counsel for Defendant
PUBLIC.RESOURCE.ORG, INC.

/s/ Jonathan Hudis

Jonathan Hudis