

# EXHIBIT F

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

AMERICAN SOCIETY FOR TESTING AND  
MATERIALS D/B/A ASTM INTERNATIONAL;  
NATIONAL FIRE PROTECTION, INC.;  
AND AMERICAN SOCIETY OF HEATING,  
REFRIGERATING, AND AIR-CONDITIONING  
ENGINEERS, INC.

Plaintiffs,  
Counter-Defendants,

Case No.:

vs.

1:13-cv-01215-EGS

PUBLIC.RESOURCE.ORG, INC.

Defendant/  
Counter-Plaintiff

---

VIDEOTAPED DEPOSITION OF THE 30 b) 6) OF  
PUBLIC.RESOURCE.ORG

DATE: Thursday, February 26, 2015

TIME: 10:07

LOCATION: 1 Market Street, Spear Tower, Suite  
2000, San Francisco, California

Reported by: Ashley Soevyn  
Certified Shorthand Reporter  
License Number 12019

Capital Reporting Company  
30(b)(6) Public.Resource.Org 02-26-2015

<p style="text-align: right;">106</p> <p>1 any information regarding federal government 2 employees' actual contributions to the writing of 3 standards. 4 MR. BRIDGES: All the same objections and 5 limitations and instructions as -- as to the 6 earlier questions. 7 THE WITNESS: I don't want to discuss 8 my -- my discussions with -- with my attorneys on 9 that subject. 10 BY MR. FEE: 11 Q So you can't identify any nonprivileged 12 information that's responsive to my question? 13 MR. BRIDGES: Same objections. 14 THE WITNESS: No, I can't. 15 BY MR. FEE: 16 Q Is the same true for the other two 17 plaintiffs? 18 MR. BRIDGES: Objection, vague and 19 ambiguous, lacks foundation and all the other same 20 objections, totally lacks foundation. 21 THE WITNESS: So for NFPA, I -- I gave you 22 a -- a much more specific example. 23 BY MR. FEE: 24 Q Okay. So for NFPA, you were aware of some 25 information regarding specific contributions made by</p>	<p style="text-align: right;">108</p> <p>1 Q So it's your understanding that the NFPA 2 web -- NFPA website has evidence of federal 3 government employees attempting to assign whatever 4 copyrights they have to NFPA? 5 MR. BRIDGES: All the same objections as 6 to the earlier line of questions and same 7 instruction. 8 THE WITNESS: Yes. 9 BY MR. FEE: 10 Q Did you see similar information with 11 respect to the other plaintiffs in this case? 12 MR. BRIDGES: All the same objections, 13 plus lacks foundation, vague and ambiguous. 14 THE WITNESS: I actually don't recall. 15 BY MR. FEE: 16 Q Aside from federal government employees, 17 are you aware of any other evidence that 18 participants in the standard development for any of 19 the plaintiffs failed to properly transfer their 20 copyright interests to the plaintiffs in this case? 21 MR. BRIDGES: All the same objections. 22 THE WITNESS: That's totally beyond my 23 expertise. I -- I can't answer that question. 24 BY MR. FEE: 25 Q Does Public Resource claim to be the owner</p>
<p style="text-align: right;">107</p> <p>1 federal -- federal government employees to 2 particular standards at issue in this case? 3 MR. BRIDGES: All the same objections as 4 to the earlier line of questioning. 5 THE WITNESS: Yes. 6 BY MR. FEE: 7 Q What about with respect to ASHRAE? 8 MR. BRIDGES: All the same objections as 9 to the line of questions -- as to the earlier line 10 of questions. 11 THE WITNESS: The same as with ASTM; a 12 number of government officials played key 13 leadership roles in the formulation of the 14 standards at issue. 15 BY MR. FEE: 16 Q Do you have any knowledge regarding 17 whether or not these federal government employees 18 purported to assign whatever copyright interests 19 they might have to the plaintiff organizations? 20 MR. BRIDGES: Objection, lacks competence, 21 may call for speculation, vague and ambiguous, may 22 call for a legal conclusion, argumentative. 23 THE WITNESS: The submissions on the NFPA 24 website appeared to do that. 25 BY MR. FEE:</p>	<p style="text-align: right;">109</p> <p>1 of any copyrighted interest in any of the standards 2 at issue in this case? 3 MR. BRIDGES: Objection, calls for a legal 4 conclusion. 5 THE WITNESS: No. 6 BY MR. FEE: 7 Q Do you personally claim to be the owner of 8 any copyright interest for any of the standards at 9 issue in this case? 10 MR. BRIDGES: Same objections. 11 THE WITNESS: No. 12 BY MR. FEE: 13 Q Do you acknowledge that the writing of 14 plaintiffs' standards requires some sort of 15 creativity to actually put words on paper? 16 MR. BRIDGES: Objection to the extent it 17 calls for a legal conclusion, assumes many facts 18 not in evidence, lacks foundation, competence, 19 calls for speculation and vague and ambiguous. 20 THE WITNESS: I'm not qualified to answer 21 that question, sir. 22 23 BY MR. FEE: 24 Q Are you aware of any evidence that would 25 suggest that any of the standards at issue in this</p>