

**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.,)	
)	
Plaintiffs/Counterclaim Defendants,)	Civil Action No. 1:14-cv-00857-CRC
)	
v.)	JOINT REPORT ON THE STATUS OF DISCOVERY
)	
PUBLIC.RESOURCE.ORG, INC.,)	
)	
Defendant/Counterclaim Plaintiff.)	
)	

Pursuant to the Court’s Order of March 9, 2015, requesting that counsel meet and confer in advance of the March 19, 2015 Status Conference in an effort to reach a consensus regarding the expeditious completion of discovery, Plaintiffs, American Educational Research Association, Inc. (“AERA”), American Psychological Association, Inc. (“APA”), and National Council on Measurement in Education, Inc. (“NCME”) (collectively, “Plaintiffs”), and Defendant, Public.Resource.Org, Inc. (“Defendant” or “Public Resource”) (collectively, “the Parties”), by and through undersigned counsel, respectfully submit this Joint Report on the Status of Discovery.

STATUS OF DISCOVERY

The Parties are currently working to resolve multiple paper discovery disputes. Public Resource sent Plaintiffs a letter on March 2, 2015 critiquing Plaintiffs’ responses to Public Resource’s First Set of Interrogatories and First Set of Requests for Production. Plaintiffs responded to this letter on March 6, 2015. On March 6, 2015, Plaintiffs also sent Public Resource a letter critiquing Public Resource’s responses to Plaintiffs’ Second Set of

Interrogatories and Second Set of Requests for Production. The Parties met and conferred by telephone in a good faith effort to resolve these disputes on March 12, 2015. Following that telephone conference, the Parties are attempting to work out the discovery issues that remain among them.

The Parties also are awaiting the Court's ruling on Plaintiffs' pending Amended Motion to Compel Discovery, Privilege Log, and Further Initial Disclosures, filed with the Court on December 15, 2014, and argued on January 22, 2015.

Plaintiffs have moved, with the consent and concurrence of Defendant, for an extension of the fact discovery deadline and subsequent deadlines. The requested extension will allow the parties time to resolve paper discovery issues and conduct depositions.

Respectfully submitted,

OBLON, McCLELLAND,
MAIER & NEUSTADT, LLP

Dated: March 17, 2015

/s/ Jonathan Hudis
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Dated: March 17, 2015

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CERTIFICATE OF SERVICE

I hereby certify that on March 17, 2015 the foregoing **JOINT REPORT ON THE STATUS OF DISCOVERY** was filed using the CM/ECF system that sent notice of the filing of these documents to all counsel of record, and was also served via e-mail to:

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