

**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/Counterclaim Defendants,)	[PROPOSED] ORDER GRANTING JOINT STIPULATION REGARDING EXTENSION OF FACT AND EXPERT DISCOVERY DEADLINES (DKT. NO. __)
v.)	
PUBLIC.RESOURCE.ORG, INC.,)	
Defendant/Counterclaimant.)	

Having fully considered the Joint Stipulation to Extend Fact and Expert Discovery Deadlines (Dkt. No. __), and for good cause shown, it is hereby

ORDERED that the Joint Stipulation to Extend Fact and Expert Discovery Deadlines (Dkt. No. __) is **GRANTED**, and it is further

ORDERED that the fact and expert discovery deadlines herein are extended as follows:

	Current Date (per Dkt. No. 22)	Stipulated Date
Close of Fact Discovery	March 16, 2015	May 18, 2015
Opening Expert Disclosures	April 15, 2015	June 15, 2015
Rebuttal Expert Disclosures	May 15, 2015	July 15, 2015
Replies to Rebuttal Disclosures	May 29, 2015	July 29, 2015
Final Replies to Expert Disclosures	June 12, 2015	August 12, 2015
Close of Discovery	July 13, 2015	September 12, 2015
Post-Discovery Conference	July 15, 2015	September 15, 2015

Dated: _____

Hon. Deborah A. Robinson
United States Magistrate Judge

CERTIFICATE OF SERVICE

I hereby certify that on April 15, 2015, the foregoing **JOINT STIPULATION REGARDING EXTENSION OF FACT AND EXPERT DISCOVERY DEADLINES** 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:

Andrew P. Bridges
Matthew B. Becker
FENWICK & WEST LLP
555 California Street, 112th Floor
San Francisco, CA 94104
abridges@fenwick.com
mbecker@fenwick.com

David Halperin
1530 P Street NW
Washington, DC 20005
davidhalperindc@gmail.com

Mitchell L. Stoltz
Corynne McSherry
ELECTRONIC FRONTIER FOUNDATION
815 Eddy Street
San Francisco, CA 94109
mitch@eff.org
corynne@eff.org

Counsel for Defendant
PUBLIC.RESOURCE.ORG, INC.

/s/ Jonathan Hudis

Jonathan Hudis