

**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/Counterdefendants,)

v.)

PUBLIC.RESOURCE.ORG, INC.,)

Defendant/Counterclaimant.)

**JOINT STIPULATION AND PROPOSED ORDER TO EXTEND THE DATE ON
WHICH EXPERT DEPOSITION MAY BE TAKEN**

STIPULATION

Counsel for Defendant Public.Resource.Org (“Public Resource”) and Plaintiffs American Educational Research Association, Inc. (“AERA”), American Psychological Association, Inc. (“APA”), and the National Council on Measurement in Education, Inc. (“NCME”) hereby enter into the following Stipulation, and respectfully request the Court’s approval of the Proposed Order.

1. The parties stipulate that the deadline for the deposition of Plaintiffs’ expert witness Dr. Phillips shall be extended to allow the deposition to be completed on September 22, 2015 in Phoenix, AZ.

2. The parties agree that this deposition schedule allows the parties to conduct this deposition in a reasonable manner while accommodating the witness’ and counsels’ various schedules.

3. Fact discovery in this action closed on May 18, 2015. The parties further agree that the closing date for all other expert discovery to be taken in this action remains as September 11, 2015, as directed by the Court's Order of June 11, 2015 (Dkt. 53).

IT IS SO STIPULATED.

Dated: September 9, 2015

FENWICK & WEST LLP

By: /s/ Matthew B. Becker
Andrew P. Bridges
Matthew B. Becker

DAVID HALPERIN
David Halperin

ELECTRONIC FRONTIER FOUNDATION
Corynne McSherry
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Attorneys for Defendant
PUBLIC.RESOURCE.ORG

Dated: September 9, 2015

QUARLES & BRADY LLP

By: /s/ Jonathan Hudis
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Attorneys for Plaintiffs
AMERICAN EDUCATIONAL RESEARCH
ASSOCIATION, INC., AMERICAN
PSYCHOLOGICAL ASSOCIATION, INC., and
NATIONAL COUNCIL ON MEASUREMENT
IN EDUCATION, INC.

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Plaintiffs/Counterdefendants,

v.

PUBLIC.RESOURCE.ORG, INC.,

Defendant/Counterclaimant.

Case No. 1:14-cv-00857-TSC-DAR

**[PROPOSED] ORDER GRANTING
JOINT STIPULATION TO EXTEND
THE DATE ON WHICH EXPERT
DEPOSITION MAY BE TAKEN
(DKT. NO. 55)**

Having fully considered the Joint Stipulation to Extend the Date on Which Expert
Deposition May Be Taken (Dkt. 55), and for good cause shown, it is hereby

ORDERED that the Joint Stipulation to Extend the Date on Which the Deposition of
Plaintiffs' expert witness Dr. Phillips may be taken (Dkt. 55) is **GRANTED**, and it is further

ORDERED that the date by which the deposition of Plaintiffs' expert witness Dr.
Phillips may be taken is extended to September 22, 2015, and it is further

ORDERED that the closing date for all other expert discovery to be taken in this action
remains as September 11, 2015, as directed by the Court's Order of June 11, 2015 (Dkt. 53).

Dated: _____

Hon. Deborah A. Robinson
United States Magistrate Judge