

**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,)	Civil Action No. 1:14-cv-00857-TSC-DAR
)	
v.)	PLAINTIFFS' MOTION FOR
)	SUMMARY JUDGMENT AND
)	ENTRY OF A PERMANENT
PUBLIC.RESOURCE.ORG, INC.,)	INJUNCTION
)	
Defendant.)	
)	

Plaintiffs, American Educational Research Association, Inc., American Psychological Association, Inc., and National Council on Measurement in Education, Inc. (collectively, “Plaintiffs”), move this Court pursuant to Fed. R. Civ. P. 56(a) and 65(d) for summary judgment and the entry of a permanent injunction.

Defendant, Public.Resource.Org, Inc. (“Public Resource”), has engaged in acts of copyright infringement and contributory copyright infringement with respect to Plaintiffs’ work, the “Standards for Educational and Psychological Testing” (the “Standards”). There are no genuine issues of material fact in dispute. Plaintiffs own a valid copyright in the Standards. It is undisputed that Public Resource copied the Standards and displayed and distributed its unauthorized copies on the Internet where the public can print, download, and copy the Standards without restriction. Defendant’s asserted defenses are not supported by undisputed facts or relevant case law.

In addition to the entry of summary judgment in their favor, Plaintiffs move for the entry of a permanent injunction. Plaintiffs have suffered, and will continue to suffer, irreparable harm if Public Resource’s copyright infringement is allowed to persist.

In support of their Motion, Plaintiffs are filing simultaneously herewith a Memorandum of Points and Authorities, a Statement of Undisputed Material Facts, and supporting declarations. Plaintiffs also are submitting a Proposed Order. Pursuant to LCvR 7(f), Plaintiffs request an oral hearing on this Motion.

Respectfully submitted,

QUARLES & BRADY LLP

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