

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

AMERICAN EDUCATIONAL RESEARCH)	
ASSOCIATION, INC., AMERICAN)	
PSYCHOLOGICAL ASSOCIATION, INC.,)	Civil Action No. 1:14-cv-00857-TSC-DAR
and NATIONAL COUNCIL ON)	
MEASUREMENT IN EDUCATION, INC.,)	PLAINTIFFS’ MOTION ON
)	CONSENT FOR EXTENSION OF
<i>Plaintiffs,</i>)	TIME TO RESPOND TO
)	DEFENDANT’S MOTION TO STRIKE
v.)	GEISINGER DECLARATION, AND
)	BRIEFING SCHEDULE THEREFORE
PUBLIC.RESOURCE.ORG, INC.,)	
)	
<i>Defendant.</i>)	

Plaintiffs, American Educational Research Association, Inc. (“AERA”), American Psychological Association, Inc. (“APA”), and National Council on Measurement in Education, Inc. (“NCME”) (collectively, “Plaintiffs”), move this Court, with Defendant’s consent, for an extension of time to respond to the motion of Defendant/Counterclaimant, Public.Resource.Org, Inc. (“Defendant”) (Dkt. No. 67) to strike the Declaration of Kurt Geisinger (filed in Support of Plaintiffs’ Motion for Summary Judgment and a Permanent Injunction - Dkt. No. 60), and for a briefing schedule on Defendant’s motion.

Pursuant to LCvR 7(m), Plaintiffs’ undersigned counsel discussed this motion with Defendant’s counsel, Matthew Becker and Sebastian Kaplan, via e-mail on January 19 and 22, 2016, in a good faith effort to determine whether there would be any opposition to the relief sought by Plaintiffs. Defendant consents to the relief requested in this motion.

Statement of Points and Authorities

On January 21, 2016, Defendant filed a motion to strike the Declaration of Kurt Geisinger Ph.D. (filed in Support of Plaintiffs’ Motion for Summary Judgment and a Permanent Injunction) (Dkt. No. 67).

The parties agree that the time for Plaintiffs to file a response to Defendant's motion to strike the Geisigner Declaration will be by February 18, 2016, and that the time for Defendant to file a reply brief in support of the motion to strike the Geisinger Declaration will be March 3, 2016.

Good cause exists for the granting of this motion. The extended briefing dates agreed to by the parties on Defendant's motion to strike the Geisinger Declaration will track the summary judgment briefing schedule set by the Court in its Minute Order of November 4, 2015. This will promote the just, speedy and less expensive determination of the parties' summary judgment motions and other motions filed relating thereto. Fed. R. Civ. P. 1.

WHEREFORE, Plaintiffs request that this motion be granted.

Respectfully submitted,

QUARLES & BRADY LLP

Dated: January 25, 2016

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