

**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,

v.

PUBLIC.RESOURCE.ORG,

Defendant.

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

**REPLY DECLARATION OF
MATTHEW BECKER IN FURTHER
SUPPORT OF DEFENDANT
PUBLIC RESOURCE’S MOTION
FOR SUMMARY JUDGMENT**

Action Filed: May 23, 2014

[REDACTED VERSION]

I, Matthew Becker, declare pursuant to 28 U.S.C. § 1746 as follows:

1. I am an attorney admitted to practice in the District of Columbia and am an associate with the law firm of Fenwick & West LLP, counsel of record for Defendant-Counterclaimant Public.Resource.Org, Inc. (“Public Resource”). Except where otherwise indicated, I have personal knowledge of the facts herein and could and would testify competently hereto.

2. [REDACTED]

3. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

4. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

5. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

6. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

7. Attached as **Exhibit 80** is a true and correct copy of excerpts of the deposition of Plaintiffs' expert S. E. Phillips, dated September 22, 2015.

8. Attached as **Exhibit 81** is a true and correct copy of Public Resource's Second Amended Responses to Plaintiffs' First Set of Interrogatories (No. 8), dated June 4, 2015.

9. Attached as **Exhibit 82** is a true and correct copy of a webpage of the U.S. Department of Justice entitled "Accessibility of State and Local Government Websites to People with Disabilities," at <http://www.ada.gov/websites2.htm>.

10. Attached as **Exhibit 83** is a true and correct copy of the Report of the Advisory Commission on Accessible Instructional Materials in Postsecondary Education for Students with Disabilities, dated December 6, 2011 and published on the U.S. Department of Education website at <http://www2.ed.gov/about/bdscomm/list/aim/meeting/aim-report.pdf>.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 3rd day of March, 2016, at San Francisco, California.

/s/ Matthew Becker

Matthew Becker