

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA,
ATLANTA DIVISION**

CAMBRIDGE UNIVERSITY PRESS,
OXFORD UNIVERSITY PRESS, INC.,
and SAGE PUBLICATIONS, INC.,

Plaintiffs,

- v. -

MARK P. BECKER, in his official
capacity as Georgia State University
President, et al.,

Defendants.

Civil Action No.
1:08-CV-1425-ODE

PLAINTIFFS' SUPPLEMENTAL INITIAL DISCLOSURES

Plaintiffs hereby supplement their initial disclosures as follows:

(1) State precisely the classification of the cause of action being filed, a brief factual outline of the case including plaintiff's contentions as to what defendant did or failed to do, and a succinct statement of the legal issues in the case.

In addition to the outline of the case set forth in the initial disclosures,

Plaintiffs state the following:

Seven months into the discovery process in this action, Defendants informed the Plaintiffs that the University System of Georgia Board of Regents

had unilaterally revised its copyright policies. Defendants claimed that this development would alter practice at GSU going forward (and thus the litigation as well). However, the deposition testimony and the documents produced under Defendants’ continuing discovery obligations have demonstrated that the new policy has changed little, if anything, in terms of copyright compliance at GSU. Georgia State University’s unauthorized and infringing uses of Plaintiffs’ works have continued unabated under the auspices of this new policy.

(4) Provide the name of any person who may be used at trial to present evidence under Rules 702, 703, or 705 of the Federal Rules of Evidence.

Plaintiffs may use the following individuals at trial to present evidence under Rules 702, 703, or 705 of the Federal Rules of Evidence: Robert B. K. Dewar, Debra Mariniello, and Steven Sheffrin. The Expert Reports of Robert Dewar, Debra Mariniello, and Steven Sheffrin are attached hereto as Exhibit A, B, and C, respectively.

Name	Last Known Address and Telephone Number
Robert B. K. Dewar, President and CEO, Ada Core Technologies	1591 Carpenter Hill Road, Bennington VT, 05201 (212) 741-0957

Debra Mariniello, Director, Rightsholder Relations & Inventory Strategy, Copyright Clearance Center	Copyright Clearance Center 222 Rosewood Drive Danvers, MA 01923 (978) 646-2409
Steven Sheffrin Professor of Economics, University of California, Davis	University of California, Davis One Shields Avenue Davis, CA 95616 (530) 752-1576

Respectfully submitted this 15th day of October, 2009.

/s/ Edward B. Krugman

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Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that I have this filed the foregoing **PLAINTIFFS'**
SUPPLEMENTAL INITIAL DISCLOSURES with the Clerk of Court using the
CM/ECF filing system which will automatically send e-mail notification of such
filing to opposing counsel as follows:

Anthony B. Askew, Esq.
Stephen M. Schaetzel, Esq.
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This 15TH day of October 2009.

/s/Edward B. Krugman