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' RESPONSE TO DEFENDANTS' MOTION FOR LEAVE TO FILE A MOTION IN LIMINE TO PREVENT PLAINTIFFS FROM INTRODUCING IMPROPER EXPERT TESTIMONY

At 9:26 p.m. on May 14, the Saturday night before trial, Defendants sought leave to file an untimely motion *in limine*. The premise offered for this extraordinary relief is the false suggestion that Plaintiffs' trial brief (filed on April 29) and their opposition to another motion *in limine* (filed May 9) revealed for the first time that Plaintiffs "planned to present evidence on the issue of market harm." Defs.' Mot., Docket No. 313 at 1. The unjustifiable timing of the motion is hardly

counterbalanced by its merit, of which there is none. Without even the pretense of legal support, Defendants assert incorrectly that proof of market harm requires expert testimony and that Plaintiffs' lay witnesses should be precluded from testifying as to the adverse impact on their businesses of the ongoing infringement at GSU. Because Defendants' motion is both untimely and baseless, it should be denied.

ARGUMENT AND CITATION OF AUTHORITY

I. PLAINTIFFS TIMELY DISCLOSED THE EVIDENCE OF MARKET HARM THEY INTEND TO INTRODUCE AT TRIAL

Last December, Plaintiffs supplemented their responses to several of Defendants' interrogatories pursuant to the Court's November 5, 2010 Order. In those supplemental responses, Plaintiffs disclosed the evidence they intended to offer at trial on the issue of market harm. For example, in response to Defendants' Interrogatory No. 15, which asked Plaintiffs to identify "the amount of harm in U.S. dollars that the markets or potential market for Plaintiffs' Copyrights have suffered as a result of the posting of excerpts of works covered by Plaintiffs' Copyrights on ERes, uLearn, and/or course and faculty websites at GSU from April 2005 to the present," Plaintiffs identified all four of the witnesses Plaintiffs will call at trial (Frank Smith, Niko Pfund, Carol Richman, and Tracey Armstrong), and they directed Defendants to summary judgment declarations filed 879316.1

by knowledgeable employees of each Plaintiff as illustrative of the market harm testimony those witnesses would offer at trial. Plaintiffs' Supplemental Responses and Objections to Defendants' First and Second Set of Interrogatories to Plaintiffs at No. 15, attached hereto as Exhibit A. Plaintiffs also referenced the portions of several of their previous submissions, including Plaintiffs' extensive summary judgment briefing, that explained in detail the legal and factual basis for Plaintiffs' contention that the ongoing, systematic copyright infringement at GSU is harming the market for their works. *Id*.

Further, in response to another of Defendants' interrogatories, Plaintiffs identified numerous specific documents of the sort they will introduce at trial to show market harm, including financial information about each Plaintiff and licensing and permissions data for the specific works at issue in this case. *Id.* at No. 17. Those documents, and others, are included on Plaintiffs' trial exhibit list, and to the extent Defendants wished to object to them (or to file a motion *in limine* as to them), they had ample opportunity to do so.

In short, Defendants' eleventh-hour assertion that they were surprised by Plaintiffs' decision not to rely solely on the testimony of Debra Mariniello to show market harm is not credible. Because Plaintiffs thoroughly briefed the issue at the summary judgment stage, Defendants have known for well over a year the legal

basis for Plaintiffs' market harm arguments, and through Plaintiffs' supplemental interrogatory responses, Defendants have had the names of the potential fact witnesses Plaintiffs could call on this issue for over six months. Defendants' motion is therefore untimely. It would, if granted, severely prejudice Plaintiffs' ability to present their case beginning on Tuesday, and on that basis alone it should be denied.

II. EXPERT TESTIMONY IS NOT REQUIRED TO SHOW MARKET HARM

Defendants' proposed motion also fails on the merits. Defendants do not cite any authority for the proposition that copyright market harm must be established through an expert witness. In fact, as Plaintiffs explained in their opposition brief to Defendants' Motion to Exclude Debra J. Mariniello as an Expert, courts routinely find copyright market harm without expert testimony. Plaintiffs' Brief in Opposition to Defendants' Motion to Exclude Debra J. Mariniello as an Expert, Docket No. 135 at 16-20.

All Plaintiffs are required to show to establish market harm is that "the effect of [Defendants'] use upon the *potential* market for or value of the copyrighted work," 17 U.S.C. § 107(4) (emphasis added) – i.e., "whether unrestricted and widespread conduct of the sort engaged in by the defendant . . . would result in a

substantially adverse impact on the potential market." *Campbell v. Acuff-Rose Music, Inc.*, 510 U.S. 569, 590 (1994) (internal quotation marks omitted).

Plaintiffs intend to make this showing at trial by offering testimony from three (non-expert) Plaintiff witnesses intimately familiar with their businesses and the academic market to establish the adverse impact that a continuation and proliferation nationally of GSU's practices would have on the viability of Plaintiffs' businesses. Plaintiffs also intend to offer testimony from the CEO of the Copyright Clearance Center, who will establish, among other things, that there is a viable and efficient permissions market for the works of publishers, including Plaintiffs, authorizing the very sorts of copying activities that are involved in this lawsuit.

There is ample precedent for evaluating copyright market harm without expert testimony. For example, in its analysis of fair use factor four, the Sixth Circuit in *Princeton University Press v. Michigan Document Servs., Inc.*, 99 F.3d 1381 (6th Cir. 1996), found that "most of the copyshops that compete with [defendant] in the sale of coursepacks pay permission fees for the privilege of duplicating and selling excerpts from copyrighted works"; that "[t]he three plaintiffs together have been collecting permission fees at a rate approaching \$500,000 a year"; and that "[i]f copyshops across the nation *were to start doing*

what the defendants have been doing here, this revenue stream would shrivel and the potential value of the copyrighted works of scholarship published by the plaintiffs would be diminished accordingly." *Princeton Univ. Press*, 99 F.3d at 1387 (emphasis added). The court did not require expert testimony to reach that straightforward, commonsense conclusion concerning likely market harm.

Similarly, in *American Geophysical Union v. Texaco, Inc.*, 60 F.3d 913 (2d Cir. 1995), the Second Circuit pointed to the existence of "a viable market" for licensing the rights to the journal articles in question; found it "appropriate that potential licensing revenues for photocopying be considered in a fair use analysis"; and affirmed the district court's conclusion that the plaintiff publishers' revenues would "increase significantly" if Texaco's fair use defense were rejected and Texaco were required to pay for the right to reproduce the plaintiffs' articles. 60 F.3d at 929-30. No expert testimony was deemed necessary.

This Court should reach a similar conclusion after trial based on non-expert testimony and documentary evidence that will provide the Court with ample grounds for making the necessary findings of market harm to reject Defendants' fair use defense and to award Plaintiffs injunctive relief.

CONCLUSION

Because Plaintiffs timely disclosed the witnesses and evidence on which they intend to rely to show market harm, and because there is no requirement that copyright market harm be established through expert testimony, Plaintiffs respectfully request that this Court deny Defendants' motion for leave to file an untimely motion *in limine*.

Respectfully submitted this 16th day of May, 2011.

/s/ John H. Rains IV Edward B. Krugman Georgia Bar No. 429927 John H. Rains IV Georgia Bar No. 556052

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Attorneys for Plaintiffs

879316.1

CERTIFICATE OF COMPLIANCE

Pursuant to Local Rule 7.1(D), I hereby certify that this document complies with the font and point selections set forth in Local Rule 5.1. This document was prepared in Times New Roman 14 point font.

/s/ John H. Rains IV John H. Rains IV

CERTIFICATE OF SERVICE

I hereby certify that I have this day filed the foregoing **PLAINTIFFS**'

RESPONSE TO DEFENDANTS' MOTION FOR LEAVE TO FILE A

MOTION IN LIMINE TO PREVENT PLAINTIFFS FROM INTRODUCING

IMPROPER EXPERT TESTIMONY with the Clerk of Court using the

CM/ECF filing system which will send e-mail notification of such filing to opposing counsel as follows:

Stephen M. Schaetzel, Esq. John W. Harbin, Esq. Natasha H. Moffitt, Esq. Kristen A. Swift, Esq. C. Suzanne Johnson, Esq. Mary Katherine Bates, Esq. KING & SPALDING 1180 Peachtree Street Atlanta, Georgia 30309

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Anthony B. Askew, Esq. MCKEON, MEUNIER, CARLIN & CURFMAN, LLC 817 W. Peachtree Street, Suite 900 Atlanta, Georgia 30308 Mary Jo Volkert, Esq. Assistant State Attorney General 40 Capitol Square Atlanta, Georgia 30334

This 16th day of May, 2011.

/s/ John H. Rains IV John H. Rains IV

EXHIBIT A

BONDURANT, MIXSON & ELMORE, LLP

ATTORNEYS AT LAW
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December 10, 2010

VIA HAND DELIVERY

Stephen M. Schaetzel, Esq. King & Spalding LLP 1180 Peachtree Street NE Atlanta, GA 30309-3521

Re:

Cambridge University Press, et al. v. Mark P. Becker, et al. United States District Court, Northern District of Georgia

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

Dear Steve:

Pursuant to the terms of the November 5, 2010 Scheduling Order in the above-referenced case and the parties' agreements concerning supplemental discovery, enclosed please find documents bearing the following Bates ranges: CUPX000001 – 289, OUPX000001 – 1134, SAGEX000001 - 1089. This production is comprised of both electronic and paper documents. Also in enclosed are Plaintiff's Supplemental Interrogatory Responses. Please let me know if you have any questions.

Sincerely.

John H. Rains IV

Enclosures

cc:

Edward B. Krugman, Esq. (w/out enclosures) Todd Larson, Esq. (via e-mail; w/out enclosures)

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

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

Plaintiffs,

- vs. -

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 RESPONSES AND OBJECTIONS TO DEFENDANTS' FIRST AND SECOND SET OF INTERROGATORIES TO PLAINTIFFS

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure and the Order of this Court dated November 5, 2010, Cambridge University Press, Oxford University Press, Inc., and Sage Publications, Inc. ("Plaintiffs"), hereby supplement their October 14, 2008 Responses and Objections to Defendants' First Set of Interrogatories to Plaintiffs (the "Initial Responses"), their February 9, 2009 and April 2, 2010 Supplemental Responses and Objections to Defendants' First Set

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of Interrogatories to Plaintiffs (the "Supplemental Responses"), and their June 12, 2009 Responses and Objections to Defendants' Second Set of Interrogatories to Plaintiffs (the "Second Responses"). The following supplemental responses are made subject to, and incorporate by reference, the prefatory paragraphs, General Objections, and Objections to Definitions and Instructions stated in the Initial Responses, and the Specific Objections stated in the Supplemental Responses and Second Responses.

SPECIFIC SUPPLEMENTAL RESPONSES AND OBJECTIONS Interrogatory No. 2

Identify each of Plaintiffs' copyrights that you allege GSU has infringed, including, but not limited to, indicating each certificate of registration by registration number for each such copyright.

Response to Interrogatory No. 2

Plaintiffs incorporate by reference their Initial and Supplemental Responses to this Interrogatory and all objections included or referenced therein. Subject to and without waiving said objections, Plaintiffs refer Defendants to Docket No. 228, Plaintiffs' response to the Court's orders of August 11 and 12, 2010 ("Plaintiffs' August Response"), as well as to Attachment A to this document, which lists, to the extent available, the registration number for (1) each work in Plaintiffs' August Response, and (2) each additional infringed work

identified on the updated ERes reports produced by Defendants on November 5, 2010 for the 2009 Maymester, Summer 2009 term, and Fall 2009 term (collectively, the "Subject Works"). Plaintiffs also state that they are producing copies of all registration certificates for the Subject Works that could be located after a reasonable search, and reserve the right to supplement that production as additional certificates are located or copies are obtained from the U.S. Copyright Office. Plaintiffs further state that given the present focus on works infringed after commencement of the litigation, Plaintiffs are seeking expedited registration of certain Subject Works not yet registered and will provide registration certificates and documents related to such registrations as soon as they are available.

Interrogatory No. 3

Describe in detail how and when you obtained ownership of Plaintiffs' copyrights and identify each Person with knowledge or information regarding your ownership of such copyrights.

Response to Interrogatory No. 3

Plaintiffs incorporate by reference their Initial Response to this

Interrogatory and all objections included or referenced therein. Subject to and
without waiving said objections, Plaintiffs also state that they are producing the
actual agreements by which they came to own or control the copyrights in the
Subject Works (or by which they became exclusive licensees) and reserve the right

to supplement that production as additional agreements are located. Plaintiffs also refer Defendants to Attachment A, which lists, to the extent available, the persons with knowledge or information regarding Plaintiffs' ownership/control of the Subject Works; in instances where the person who participated directly in negotiating with the author of the Subject Work cannot be identified, or has since left the Plaintiff company, Attachment A identifies the person(s) at the Plaintiff company with general knowledge and information as to the company's author contracts and contracting process.

Interrogatory No. 6

For each of Plaintiffs' copyrights for which a certificate of registration has not issued, please state whether an application for registration was made to the Copyright Office for each such copyright and the date(s) of such application.

Response to Interrogatory No. 6

Plaintiffs incorporate by reference their Initial Response to this

Interrogatory and all objections included or referenced therein. Subject to and
without waiving said objections, Plaintiffs refer Defendants to Attachment A,
which indicates, in the penultimate column, the works for which a U.S. copyright
registration number has not been assigned to date. Plaintiffs state that given the
present focus on works infringed after commencement of the litigation, they are
seeking expedited registration of those works and will provide registration

certificates and documents related to such registrations as soon as they are available. Plaintiffs note, however, that no applications have been or will be made for those works identified on Attachment A as "First Published in the United Kingdom."

Interrogatory No. 9

Identify each Person to whom a license to reproduce in whole or in part the works that are the subject of Plaintiffs' copyrights has been granted.

Response to Interrogatory No. 9

Plaintiffs incorporate by reference their Initial and Supplemental Responses to this Interrogatory and all objections included or referenced therein. Subject to and without waiving the foregoing objections, Plaintiffs refer Defendants to CUPX 000237 – CUPX 000289, OUPX 000643 – OUPX 000651, OUPX 000652 – OUPX 000800, SAGEX 000454 – SAGEX 000501, and SAGEX 000503 – SAGEX 001043, which provide the requested information for each Subject Work.

Interrogatory No. 15

Identify the amount of harm in U.S. dollars that the markets or potential market for Plaintiffs' Copyrights have suffered as a result of the posting of excerpts of works covered by Plaintiffs' Copyrights on ERes, uLearn, and/or course and faculty websites at GSU from April 2005 to the present.

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Response to Interrogatory No. 15

Plaintiffs incorporate by reference their response to this Interrogatory from the Second Responses and all objections included or referenced therein.

(References in the Second Response to Plaintiffs' "response to Interrogatory 17" should be understood to encompass and refer as well to Plaintiffs' supplemental response to Interrogatory 17 below, which lists, among other things, financial documents identifying Plaintiffs' revenues for book sales, licensing, and rights and permissions for the Subject Works.) Plaintiffs also refer Defendants to the following filings and testimony that further describe how Plaintiffs have been harmed by Defendants' activities, including infringement of the Subject Works:

- Plaintiffs' August Response, Docket No. 228;
- Declaration of Sara van Valkenberg, SAGE Publications, Exhibit 3 ISO
 Plaintiffs' Motion for Summary Judgment, Docket No. 143 (¶¶ 8-16, 3343); deposition testimony of Ms. van Valkenberg and anticipated testimony
 of Ms. van Valkenberg and/or Carol Richman, Director of Licensing for
 SAGE Publications;
- Declaration of Niko Pfund, Oxford University Press, Exhibit 5 ISO Plaintiffs' Motion for Summary Judgment, Docket No. 143 (¶¶ 7-8, 17-20, 34-44); deposition and anticipated testimony of Mr. Pfund and/or John Challice, V.P. and Publisher for OUP Higher Ed. Division;
- Declaration of Frank Smith, Cambridge University Press, Exhibit 4 ISO Plaintiffs' Motion for Summary Judgment, Docket No. 143 (¶¶ 30-42); deposition and anticipated testimony of Mr. Smith;
- Declaration of Steven Sheffrin, Exhibit 9 ISO Plaintiffs' Motion for

- Summary Judgment, Docket No. 143 (in its entirety); deposition and anticipated testimony of Mr. Sheffrin;
- Affidavit of Debra J. Mariniello (attaching expert report), Exhibit 10 ISO
 Plaintiffs' Motion for Summary Judgment, Docket No. 143 (pp. 16-19, 2022 of expert report); deposition testimony of Ms. Mariniello and anticipated
 testimony of Ms. Mariniello and/or Tracey Armstrong, CEO of Copyright
 Clearance Center;
- Plaintiffs' Memorandum of Law in Opposition to Defendants' Motion to Exclude Debra J. Mariniello as an Expert, Docket No. 134 (pp. 8-20);
- Plaintiffs' Memorandum of Law ISO Motion for Summary Judgment, Docket No. 142, (pp. 10-12, 16-21, 32-35, 54-58);
- Plaintiffs' Local Rule 56.1 Statement of Facts ISO Their Motion for Summary Judgment, Docket No. 165 (pp. 16-20, 33-49, 64-76);
- Plaintiffs' Response in Opposition to Defendants' Motion for Summary Judgment, Docket No. 185 (pp. 4-9);
- Plaintiffs' Reply Memorandum of Law In Further Support of Their Motion for Summary Judgment, Docket No. 206 (pp. 12-16, 18-19).

Plaintiffs reserve the right to supplement this response as new documents are identified, and after reviewing Defendants' production of documents (including course syllabi, fair-use checklists, etc.) related to the Subject Works.

Interrogatory No. 16

Identify the amount of revenue in U.S. dollars that Plaintiffs have lost as a result of the postings of excerpts of works covered by Plaintiff's Copyrights on Eres, uLearn, and/or course and faculty websites from April 2005 to the present.

Response to Interrogatory No. 16

Plaintiffs incorporate by reference their responses and objections to

Interrogatories No. 15 above and 17 below, as well as their response to this Interrogatory from the Second Responses and all objections included or referenced therein.

Interrogatory No. 17

Identify all facts and all documents (by bates-number) that support Plaintiffs' contention that Plaintiffs' have suffered market harm for the works covered by Plaintiffs' Copyrights as a result of the posting of excerpts of such works on Eres, uLearn, and/or course and faculty websites at GSU from April 2005 to the present.

Response to Interrogatory No. 17

Plaintiffs incorporate by reference their response to this Interrogatory from the Second Responses and all objections included or referenced therein.

(References in the Second Responses to Plaintiffs' "responses and objections to Interrogatory No. 15" should be understood to encompass and refer as well to Plaintiffs' supplemental response to Interrogatory 15 above.) Subject to and without waving said objections, Plaintiffs refer Defendants to Plaintiffs' August Response (which detailed lost permissions fees and book sale prices associated with infringement of the Subject Works), as well as all documents produced by Defendants and Plaintiffs in this proceeding, including in particular (a) the documents listed in Plaintiffs' response to this Interrogatory from the Second Response and (b) the following recently produced documents related to the Subject

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Works:

- GSU Eres Reports
 - o GaState0064598-65065.
- Plaintiffs' Revenue/Financial Documents
 - o CUPX 000170 CUPX 000236;
 - o OUPX 000639; OUPX 000640 OUPX 000642;
 - o SAGEX 000502; SAGEX 000414 SAGEX 000453, SAGEX 001044.
- Plaintiffs' Revenue from Licensing and Permissions (attributable to CCC and in-house permissions department activities)
 - o CUPX 000237 CUPX 000289;
 - OUPX 000643 OUPX 000651; OUPX 000652 OUPX 000800;
 - o SAGEX 000454 SAGEX 000501; SAGEX 000503 SAGEX 001043.

Plaintiffs reserve the right to supplement this response as new documents are identified, and after reviewing Defendants' production of documents (including course syllabi, fair-use checklists, etc.) related to the Subject Works.

Interrogatory No. 18

Identify all facts and all documents (by bates-number) that support Plaintiffs' contention that "Georgia State's ongoing unauthorized digital distribution of Plaintiffs' copyrighted materials is directly substituting both for student purchases or [sic] copyrighted books and for 'coursepaks' or 'copy pocks' [sic].

Response to Interrogatory No. 18

Plaintiffs incorporate by reference their responses and objections to Interrogatories No. 15 and 17 above.

Interrogatory No. 19

Identify all documents (by bates-number) that support Plaintiffs' contention that "Plaintiffs, authors, and the publishing community at large will continue to face a certain, substantial, and continuing loss of revenue."

Response to Interrogatory No. 19

Plaintiffs incorporate by reference their responses and objections to Interrogatory No. 17 above.

Respectfully submitted this 10th day of December.

Edward B. Krugman krugman@bmelaw.com Georgia Bar No. 429927 John H. Rains IV rains@bmelaw.com Georgia Bar No. 556052

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Randi Singer (pro hac vice) Jonathan Bloom (pro hac vice) Todd D. Larson (pro hac vice)

WEIL, GOTSHAL & MANGES LLP 767 Fifth Avenue New York, New York 10153 Telephone: (212) 310-8000

Attorneys for Plaintiffs

Facsimile: (212) 310-8007

CERTIFICATE OF SERVICE

I hereby certify that I have this day caused a true and correct copy of the

foregoing PLAINTIFFS' SUPPLEMENTAL RESPONSES AND

OBJECTIONS TO DEFENDANTS' FIRST AND SECOND SET OF

INTERROGATORIES TO PLAINTIFFS to be served as indicated:

Via Electronic Mail and Hand Delivery

Anthony B. Askew, Esq. Stephen M. Schaetzel, Esq. Kristen A. Swift, Esq. C. Suzanne Johnson, Esq. King & Spalding 1180 Peachtree Street Atlanta, Georgia 30309

Via Electronic Mail and First Class Mail

Kristina M. Quicker, Esq. BALLARD SPAHR, LLP 999 Peachtree Street, Suite 1000 Atlanta, GA 30309

Mary Jo Volkert, Esq. Assistant S. Attorney General 40 Capitol Square Atlanta, Georgia 30334

This 10th day of December, 2010.

John H. Rains IV

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

CAMBRIDGE UNIVERSITY PRESS, et al.,

Plaintiffs,

- VS -

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

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

Defendants.

VERIFICATION OF INTERROGATORY ANSWERS

I, Barbara Cohen, hereby declare pursuant to section 1746 of title 28 of the United States Code:

I am the General Counsel for Oxford University Press, Inc. I am authorized to execute the answers to interrogatories on behalf of Oxford University Press, Inc. I have read the supplemental answers to Interrogatories No. 2, 3, 6, 9, and 15-19. These responses are based on information provided by multiple persons, and neither I nor any other single individual has personal knowledge of all the information set forth in the responses or considered in their preparation. The responses are also necessarily limited by the records and information still in existence and discovered in the course of this action. Subject to these limitations, to the best of my knowledge, information and belief, I have determined that the supplemental answers to Interrogatories No. 2, 3, 6, 9, and 15-19 are true and correct to the extent they provide information related to Oxford University Press, Inc.

I verify, under penalty of perjury, that the foregoing is true and correct.

Executed on December 10, 2010.

Barbara Cohen

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

CAMBRIDGE UNIVERSITY PRESS, et al.,

Plaintiffs,

- vs. -

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

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

Defendants.

VERIFICATION OF INTERROGATORY ANSWERS

I, Sara van Valkenburg, hereby declare pursuant to section 1746 of title 28 of the United States Code:

I am the Contracts Manager for SAGE Publications, Inc. I am authorized to execute the answers to interrogatories on behalf of SAGE Publications. I have read the supplemental answers to Interrogatories No. 2, 3, 6, 9, and 15-19. These responses are based on information provided by multiple persons, and neither I nor any other single individual has personal knowledge of all the information set forth in the responses or considered in their preparation. The responses are also necessarily limited by the records and information still in existence and discovered in the course of this action. Subject to these limitations, to the best of my knowledge, information and belief, I have determined that the supplemental answers to Interrogatories No. 2, 3, 6, 9, and 15-19 are true and correct to the extent they provide information related to SAGE Publications, Inc.

I verify, under penalty of perjury, that the foregoing is true and correct.

Executed on December 10, 2010.

Sara van Valkenburg

EXHIBIT A

Course Title	Instructor	Title of Work	Copyright Cowner/ Licensee of Work	# of Chapters Distributed	Page Range	# of Pages Distributed	Copyright Registration Number (Interrogatory No. 2 Response)	Interrogatory No. 3 Response
		Pronunciation Games	Cambridge	Selections	8-27	20	First published in United Kingdom	Kevin Taylor, Director of Strategy & Intellectual Property Claire Cole, Development Editor, English Language Teaching
	Murphy	Keep Talking: Communicative Fluency Activities for Language Teaching	Cambridge	1 (partial)	58-98	41	First published in United Kingdom	Kevin Taylor, Director of Strategy & Intellectual Property Claire Cole, Development Editor, English Language Teaching
AL8480 -		More Grammar Games: Cognitive, Affective and Drama Activities for EFL Students	Cambridge	Selections	58-93	36	Registration pending	Kevin Taylor, Director of Strategy & Intellectual Property Robert Vernon, Senior Development Editor, English Language Teaching
Classroom Practices in Teaching ESL/EFL		Grammar Practice Activities (1st edition)	Cambridge	Selections	44-102	59	First published in United Kingdom	Kevin Taylor, Director of Strategy & Intellectual Property Alison Sharpe, Editor
		Five-Minute Activities: A Resource Book of Short Activities	Cambridge	Selections	1-23	23	Registration pending	Kevin Taylor, Director of Strategy & Intellectual Property Claire Cole, Development Editor, English Language Teaching
·		Newspapers	Oxford	1	30-58	29	First published in United Kingdom	Peter Marshall, Managing Director, English Language Teaching
		Role Play: Resource Books for Teachers	Oxford	Unspecified	24-62	39	First published in United Kingdom	Peter Marshall, Managing Director, English Language Teaching

CourseTitle	Instrucio	Title of Work	Gogyfglif Gwna/ Licensecof Works	901 Orapiers Distributed	Page Range	#of Pages Distributed	මරුහුවල්බ Registration (Atmibe (Interception) (Po. 2 Response)	Interrogatory No. 3 Response
AL8480 - Classroom	Murphy	Writing: Resource Books for Teachers	Oxford	Unspecified	50-80	31	First published in United Kingdom	Peter Marshall, Managing Director, English Language Teaching
Practices in Teaching ESL/EFL		Vocabulary	Oxford	2	12-27 30-45	32	First published in United Kingdom	Peter Marshall, Managing Director, English Language Teaching
	Kaufmann	The Craft of Inquiry: Theories, Methods, Evidence	Oxford	1	21-31	11	TX 4-742-637	Sherith Pankratz, Editor, Higher Education
		Handbook of Feminist Research: Theory and Praxis	SAGE	1	515-534	20	TX 7-031-746	Sara van Valkenburg, Contracts Manager
EPS8500 - Qualitative/ Interpretive Research in Education I		Handbook of Social Theory	SAGE	1	217-228	12	First published in United Kingdom	Huw Alexander, Rights & Digital Sales Manager
Education		The SAGE Handbook of Qualitative Research (3rd edition)	SAGE	4	1-32 357-375 443-465 651-679	103	TX 6-175-287	Sara van Valkenburg, Contracts Manager
		The SAGE Handbook of Qualitative Research (2nd edition)	SAGE	3	717-732 733-768 923-948	78	TX 5-220-475	Sara van Valkenburg, Contracts Manager

Course Title	Institucio:	Title of Work	Copyright Owner/ Micensee of Work	iio) Ofteptats Ofstilotical	Page Range	Distributed	eopyright Registration Number (interrogatory No. 2 Response)	Interrogatory No-3 Response
		Handbook of Critical and Indigenous Methodologies	SAGE	2	85-100 135-156	38	TX 7-164-515	Sara van Valkenburg, Contracts Manager
EPS8500 - Qualitative/ Interpretive Research in Education I	Kaufmann	Qualitative Research Practice	SAGE	1	391-406	16	First published in United Kingdom	Huw Alexander, Rights & Digital Sales Manager
		Handbook of Narrative Inquiry	SAGE	1	3-34	32	TX 6-512-848	Sara van Valkenburg, Contracts Manager
		Inside Interviewing: New Lenses, New Concerns	SAGE	1	415-428*	14	TX 6-744-04	Sara van Valkenburg,
EPS8510- Qualitative Research in Eduation II	Kaufmann	Handbook of Qualitative Research (2nd edition)	SAGE	2	717-732 923-948	42	TX 5-220-475	Contracts Manager
		Qualitative Research Practice	SAGE	1	391-406	16	First published in United Kingdom	Huw Alexander, Rights & Digital Sales Manager
EPRS8510 - Qualitative Research in Education II	Esposito	Rubin, Herbert and Rubin, Irene. (2005). Qualitative Interviewing; The responsive interview as extended conversation.	SAGE	1	108-128	21	TX 6-081-361, TX 4-032-771	Sara van Valkenburg, Contracts Manager

Course ville	Instructor	Title of Work	Copyright Owner/s !License-of/ Work	#61 Chapters Distributed	Page Range*	Distributed	Gopyright Registration Number (Interrogatory No. 2 Response)	Interrogatory No. 3 Response
IB4410 - Management in Transition Economies:The Czech Republic & Hungary	Danis	The Enlargement of the European Union	Oxford	1	79-88	10	First published in United Kingdom	John Louth, Editor, Law
SOCI3216 - Gender	Marni Kahn	Am I Thin Enough Yet?	Oxford	Unspecified	Unspecified	Unspecified	TX 4-291-430	Catherine Barnes, Editor, Medical
and Society	or Heying Zhan	The Gendered Society Reader	Oxford	2	1-6 478-189	18	TX 6-912-360	Sherith Pankratz, Editor, Higher Education
EPY7080 - The Psychology of Learning and the Learner	Thompson	Handbook of Adult Development and Learning	Oxford	1	73-98	26	TX 6-934-723	Sarah Harrington, Editor, Medical
FILM1010 - Film Aesthetics and Analysis	Cannon	Film Theory and Criticism (2009)	Oxford	5 chapters; part of 1 additional chapter	65-71 774-782 812-819 892-900 901-913 914-926	59	TX 6-928-005	Peter Labella, formerly Editor, Higher Education John Challice, Publisher, Higher Education
MUS8860 - Romantic Period 1800-1900	Orr	The Cambridge Companion to Schubert	Cambridge	1	121-137	17		Kevin Taylor, Director of Strategy & Intellectual Property Victoria Cooper, Senior Commissioning Editor, Humanities & Social Sciences

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MUS8860 - Romantic Period 1800-1900	The Cambridge Companion to Berlioz	Cambridge	Unspecified	Unspecified	Unspecified		Kevin Taylor, Director of Strategy & Intellectual Property Victoria Cooper, Senior Commissioning Editor, Humanities & Social Sciences

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COMM4750 - Film Theory and Criticism	Raengo	Film Theory and Criticism (2009)	Oxford	Unspecified	Unspecified	Unspecified	TX 6-928-005	Peter Labella, formerly Editor, Higher Education John Challice, Publisher, Higher Education
EPRS8510 - Qualitative Research in	Kaufmann	Handbook of Qualitative Research (2nd edition)		2	717-732 923-948*	42	TX 5-220-475	Sara van Valkenburg, Contracts Manager
Education II		Inside Interviewing: New Lenses, New Concerns Handbook of Ethnography	SAGE SAGE	1	415-428* 188-203	14 16	TX 6-744-045 First published in	
							United Kingdom	Rights & Digital Sales Manager
EPS8280 -		Handbook of Feminist Research: Theory and Praxis	SAGE	1	155-172	18	TX 7-031-746	Sara van Valkenburg, Contracts Manager
Anthropology of Education	Esposito	Handbook of Qualitative Research (3rd edition)	SAGE	1	455-486	32	TX 6-175-287	Sara van Valkenburg, Contracts Manager
		Handbook of Qualitative Research (2nd edition)	SAGE	1	70-82	13	TX 5-220-475	Sara van Valkenburg, Contracts Manager

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EPS8280 - Anthropology of Education	Esposito	Handbook of Qualitative Research (1st edition)	SAGE	1	70-82	13	TX 3-721-799	Sara van Valkenburg, Contracts Manager
EPY7080 - The Psychology of Learning and the Learner	Thompson	Handbook of Adult Development and Learning	Oxford	1	73-98	26	TX 6-934-723	Sarah Harrington, Editor, Medical
		The Cambridge Companion to Schubert	Cambridge	1	121-137	17	Registration pending	Kevin Taylor, Director of Strategy & Intellectual Property Victoria Cooper, Senior Commissioning Editor, Humanities & Social Sciences
MUS8860 - Romantic Period 1800-1900	Orr	Liszt: Sonata in B Minor	Cambridge	1	28-48	21	Registration pending	Kevin Taylor, Director of Strategy & Intellectual Property Victoria Cooper, Senior Commissioning Editor, Humanities & Social Sciences
1800-1800		The Cambridge Companion to Mendelssohn	Cambridge	1 (partial)	96-111	16	United Kingdom	Kevin Taylor, Director of Strategy & Intellectual Property Victoria Cooper, Senior Commissioning Editor, Humanities & Social Sciences
		The Companion to Schumann	Cambridge	Unspecified	Unspecified	Unspecified	United Kingdom	Kevin Taylor, Director of Strategy & Intellectual Property Victoria Cooper, Senior Commissioning Editor, Humanities & Social Sciences

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		The Cambridge Companion to Beethoven	Cambridge	1	165-185	21	Registration pending	Kevin Taylor, Director of Strategy & Intellectual Property Victoria Cooper, Senior Commissioning Editor, Humanities & Social Sciences
MUS8860 - Romantic Period 1800-1900	Orr	Schubert, Müller, and Die schöne Müllerin	Cambridge	1 (partial)	159 201-203	4	Registration pending	Kevin Taylor, Director of Strategy & Intellectual Property Victoria Cooper, Senior Commissioning Editor, Humanities & Social Sciences
		The Music of Berlioz	Oxford	1 (partial)	250-267	18	First published in United Kingdom	Sarah Holmes, Éditor, Academic
		The Operas of Charles Gounod (1990)	Oxford	1	99-126	28	First published in United Kingdom	Niko Pfund, Publisher, Academic
SOCI3216 - Gender and Society	Marni Kahn Brown	The Gendered Society Reader	Oxford	1	478-489	12	TX 6-912-360	Sherith Pankratz, Editor, Higher Education
EPY7090 - Learning and the Learner	Kruger***	Awakening Children's Minds	Oxford	1	181-199	19	TX 5-335-981	Joan Bossert, Editor, Medical

Attachment A: Plaintiffs' Interrogatory Responses Nos. 2 and 3 Fall 2009

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100 Target County of the Count	900 m 1 m 1 m 1 m 1 m 1 m 1 m 1 m 1 m 1 m	The Slave Community	Oxford	1	249-283	35	TX 0000367220	Johh Challice, Publisher, Higher Education
AAS3000 -		African American Single Mothers: Understanding Their Lives and Families	SAGE	1	117-145	29	TX 4-009-242	Sara van Valkenburg, Contracts Manager
African-American Family	Dixon	Black Children	SAGE	1	73-96	24	TX 5-439-988	Sara van Valkenburg, Contracts Manager
		Black Families (1997)	SAGE	1	214-233	20	TX 7-012-550, TX 4-352-649, TX 2-385-511	Sara van Valkenburg, Contracts Manager
AH4900 -		Ancient Egyptian Materials and Technology	Cambridge	1 (plus add'l partial chapter)	44-54 104-120	28	Registration pending	Kevin Taylor, Director of Strategy & Intellectual Property Helen Barton, Commissioning Editor, Linguistics
Materiality of Egyptian Painting	Hartwig	The Oxford Encyclopedia of Ancient Egypt, Vol. 3 (2001)	Oxford	1	1-13	13	TX 5-334-566	Stephen Wagley, Editor, Reference

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AL8500 - Pragmatics and Language Teaching	Pickering	Rethinking Context: Language as an Interactive Phenomenon (1992)	Cambridge	1	229-252	24	First published in United Kingdom	Kevin Taylor, Director of Strategy & Intellectual Property Helen Barton, Commissioning Editor, Linguistics
AL8550 - Second Language	<i>w</i>	Criterion-Referenced Language Testing	Cambridge	1	101-148	48	Registration pending	Kevin Taylor, Director of Strategy & Intellectual Property Anna Linthe, Senior Development Editor, English Language Teaching
Evaluation and Assessment	Kim	Assessing Grammar	Cambridge	2	49-82 100-145	80	Registration pending	Kevin Taylor, Director of Strategy & Intellectual Property Helen Barton, Commissionin Editor, Linguistics Kevin Taylor, Director of Strategy & Intellectual Property Anna Linthe, Senior Development Editor, English
ANTH4440 -	Magazakia	International Health Organisations and Movements, 1918-1939	Cambridge	1	222-43	22	Registration pending	Strategy & Intellectual Property Michael Watson, Publisher,
Epidemiology and Anthropology	McCombie	Evolution of Infectious Disease	Oxford	1	15-34	20	TX 4-319-137	

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ANTH4440 - Epidemiology and Anthropology	McCombie	Evolutionary Medicine	Oxford	1	245-269	25	TX 4-260-885	Jeremy Lewis, Editor, Academic
COMM4800 - Media Ethics & Society	Freeman	Living Ethics: Across Media Platforms	Oxford	Unspecified	Unspecified	Unspecified	TX 6-877-035	Peter Labella, formerly Editor, Higher Education John Challice, Publisher, Higher Education
ENGL4200 - Cyborgs in American Culture		A History of Feminist Literary Criticism	Cambridge	1	322-335	14	First published in United Kingdom	Kevin Taylor, Director of Strategy & Intellectual Property Ray Ryan, Senior Commissioning Editor, Humanities & Social Sciences

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		The Craft of Inquiry: Theories, Methods, Evidence	Oxford	1	21-31	11	TX 4-742-637	gradient de la company de la c
		Approaches to Qualitative Research: A Reader on Theory and Practice	Öxford	1	447-472	26	TX 5-806-220	Sherith Pankratz, Editor, Higher Education Sara van Valkenburg, Contracts Manager Sara van Valkenburg,
EPRS8500 - Qualitative/		Qualitative Research and Evaluation Methods (3rd edition)	SAGE	Part of 1 chapter	544-545	2	TX 5-459-984	
Interpretive Research in Education I	Kaufmann	Handbook of Feminist Research: Theory and Praxis	SAGE	1	71-107 155-172 515-534	75	TX 7-031-746	Sherith Pankratz, Editor, Higher Education Sara van Valkenburg, Contracts Manager Sara van Valkenburg,
		Handbook of Narrative Inquiry: Mapping a Methodology	SAGE	1	35-76	42	TX 6-512-848	
		The SAGE Handbook of Qualitative Research (3rd edition)	SAGE	8	1-32 109-138 357-373 443-465 547-557 733-768 915-932 959-978	186	TX 6-175-287	

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EPRS8500 - Qualitative/ Interpretive Research in Education I	Kaufmann	Handbook of Social Theory (2001)	SAGE	1	217-228	12	First published in United Kingdom	Huw Alexander, Rights & Digital Sales Manager
EPRS8520 - Qualitative Research in Education III	Esposito	Constructing Grounded Theory	SAGE	1	42-71	30	First published in United Kingdom	Huw Alexander, Rights & Digital Sales Manager
		Designing and Conducting Mixed Methods Research	SAGE	1	203-250	48	TX 7-000-237	
EPRS8520 - Qualitative Research in Education III	Esposito	Handbook of Mixed Methods in Social & Behavorial Research	SAGE	1	305-338	34	TX 5-614-935	Sara van Valkenburg, Contracts Manager
		Theoretical Frameworks in Qualitative Research	SAGE	2	xii-xxx 189-196	27	TX 6-989-056	

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EPS8280 - Anthropology of Education	Esposito	Handbook of Qualitative Research (2d ed)	SAGE	1	70-82	13	TX 3-721-799	Sara van Valkenburg, Contracts Manager
EPY8070 - Understanding and Facilitating Adult Learning	Greenberg	Handbook of Adult Development and Learning	Oxford	2	52-70 455-475	40	TX 6-934-723	Sarah Harrington, Editor, Medical
EPY8220 - Advanced Developmental Psychology: Personality and Socialization	Kruger	Understanding Trauma: Integrating Biological, Clinical and Cultural Perspectives	Cambridge	1	224-241	18	Registration pending	Kevin Taylor, Director of Strategy & Intellectual Property Simina Carlin, Editor, Psychology & Education
EPY8960 - Seminar in Educational Psychology	Anggoro	Language Acquisition and Conceptual Development	Cambridge	1	566-588	23	Registration pending	Kevin Taylor, Director of Strategy & Intellectual Property Helen Barton, Commissioning Editor, Linguistics
		Film Language: A Semiotics of the Cinema (1974)	Oxford	1	108-148	41	Registration pending	Niko Pfund, Publisher, Trade
FILM4750 - Film Theory and Criticism	Barker	Film Theory and Criticism (2004) Film Theory and Criticism: Introductory Readings (1999)	Oxford Oxford	4	68-74 212-215 345-355 716-724	32	TX 5-946-052	Peter Labella, formerly Editor, Higher Education John Challice, Publisher, Higher Education

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HIST4820 - Cross-Cultural Encounters in World History	Gainty	The Cambridge History of China, Volume 8, Part 2	Cambridge	1	272-300	29	Registration pending (vol 10, 11, 3 registered)	Kevin Taylor, Director of Strategy & Intellectual Property Eric Crahan, Editor, History & Politics, and Editorial Operations Manager
HIST7010 - Issues and Interpretations in American History	Davis	Region, Race and Reconstruction	Oxford	1	143-177	35	TX 0000949127	Niko Pfund, Publisher, Trade
HIST7010 - Issues and Interpretations in American History	Davis	The Unpredictable Past: Explorations in American Cultural History	Oxford	1	35-58	24	TX 4-640-675	Niko Pfund, Publisher, Trade
HON1000 - Love: Religious and Philosophical Perspectives	Lloyd	The Fragility of Goodness: Luck and Ethics in Greek Tragedy and Philosophy	Cambridge	1	165-199	35	Registration pending	Kevin Taylor, Director of Strategy & Intellectual Property Beatrice Rehl, Publishing Director, Humanities & Social Sciences

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The second secon		The Organ As a Mirror of Its Time: North European Reflections 1610- 2000	Oxford	1	78-91	14	TX 5-586-351	Suzanne Ryan, Editor, Academic
		North Italian Church Music in the Age of Monteverdi	Oxford	1+	48-61 Unspecified sections	14 + Unspecified sections	First published in United Kingdom	Niko Pfund, Publisher, Academic
		North German Church Music in the Age of Buxtehude 1996	Oxford	1	9-26	18	First published in United Kingdom	Niko Pfund, Publisher, Academic
MUS8840 - Baroque Music	Orr	The Cambridge Campanion to Bach	Cambridge	1	72-85	14	Registration pending	Kevin Taylor, Director of Strategy & Intellectual Property Victoria Cooper, Senior Commissioning Editor, Humanities & Social Sciences
		Handel's Dramatic Oratorios and Masques	Oxford	2	33-80 274-310	85	First published in United Kingdom	Niko Pfund, Publisher, Academic
		Johann Sebastian Bach: The Culmination of an Era	Oxford	4 essays/part of 1 ch	211-242	32	Registration pending	Jan Beatty, Editor, Higher Education

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NURS8035 - Theoretical and		Objective Knowledge: An Evolutionary Approach	Oxford	1	1-31	31	Registration pending	John Challice, Publisher, Higher Education
Philosophical Foundations for Nursing	Moloney	Handbook of Mixed Methods in Social & Behavioral Research	SAGE	1	541-556	16	TX 5-614-935	Sara van Valkenburg, Contracts Manager
PERS2001 -		Crabgrass Frontier: The Suburbanization of the United States	Oxford	1	246-271	26	TX 1-688-521	Susan Ferber, Editor, Paperback
Comparative Culture	Lasner	The Politics of Public Housing: Black Women's Struggles Against Urban Inequality	Oxford	1	21-53	33	TX 6-033-330	Niko Pfund, Publisher, Academic
POLS3450 - U.S. Foreign Policy	Hankla	Contemporary Cases in U. S. Foreign Policy: From Terrorism to Trade	SAGE	1	25-58	34	TX 6-906-070, TX 5-445-213, TX 6-181-314	Andrea Higginbotham, Rights and Contracts Administrator
POLS3450 - U.S. Foreign Policy	Hankia	U.S. Foreign Policy: The Paradox of World Power	SAGE	1	162-199	38	TX 6-814-128, TX 6-082-538	Andrea Higginbotham, Rights and Contracts Administrator

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POLS8250 -		Democratic Accountability in Latin America	Oxford	1	3-33	31	First published in United Kingdom	Niko Pfund, Publisher, Academic
Latin American Politics	McCoy	Regimes and Democracy in Latin America: Theories and Methods	Oxford	3	1-24 25-38 39-50	50	First published in United Kingdom	Dominic Byatt, Editor, Academic
POLS8470 - Military Conflict and International Security	Duffield	Behavior, Society, and Nuclear War, Vol. 1	Oxford	1 (partial)	8-15 19-48	38	TX 2-752-091	Jen Carpenter, Editor, Higher Education
PSYC4030 - Cross-Cultural Psychology	Whitten	A World of Babies: Imagined Childcare Guides for Seven Societies	Cambridge	1 [plus part of additional chapter]	27 91-112	23	Registration pending	Kevin Taylor, Director of Strategy & Intellectual Property Helen Barton, Commissioning Editor, Linguistics
RELS3950 - Religion, Morality, and Film	Ruprecht	Dionysus Since 69: Greek Tragedy at the Dawn of the Third Millennium	Oxford	1	49-75	27	First published in United Kingdom	Niko Pfund, Publisher, Academic
RELS4200 - Religion in America	Weiner	American Religions: A Documentary History	Oxford	Unspecified	Unspecified	Unspecified	Registration pending	Robert Miller, Editor, Higher Education

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SOCI3216 - Gender and Society		The Gendered Society Reader	Oxford		41-49 235-260 478-489	47	TX 6-912-360	
SOCI3216 - Gender and Society	Markle	The Gendered Society Reader	Oxford	2	14-25 478-489	24	TX 6-912-360	Sherith Pankratz, Editor, Higher Education
		From Max Weber: Essays in Sociology	Oxford	1	196-235	40	Registration pending	Sherith Pankratz, Editor, Higher Education
SOCI8030 - Social Theory I	Harvey	The Power Elite	Oxford	2	269-297 298-324	56	TX 6-941-020, A00000236642	Niko Pfund, Publisher, Paperback
		Social Theory: Roots and Branches Readings	Oxford	2	32-37 60-67	12	TX 6-895-280	Sherith Pankratz, Editor, Higher Education

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		Challenges of the Third Age: Meaning and Purpose in Later Life	Oxford	1	81-114	34	TX 5-458-293, TX 5-506-288	Tracy O'Hara, Editor, Medical
SOCI8116 - Sociology of Aging	Perkins	Neighborhoods and Health	Oxford	1	303-333	31	TX 5-744-977	
		Social Determinants of Health	Oxford	1	267-295	29	First published in United Kingdom	Maura Roessner, Editor, Medical
SW8200 -		The SAGE Handbook of Qualitative Research (2nd edition)	SAGE	1	803-820	18	TX 5-220-475	Sara van Valkanhuus
SW8200 - Evaluation and Technology	Ohmer	Utilization-Focused Evaluation: The New Century Text (3rd edition)	SAGE	2	1-38	38	TX 6-990-823, TX 4-435-019	Sara van Valkenburg, Contracts Manager

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SW8200 - Evaluation and Technology	Ohmer	Handbook of Community Practice (2005)	SAGE	1	604-619	16	TX 6116867	Sara van Valkenburg, Contracts Manager
WST4830 - Class Matters	Kubala	A Brief History of Neoliberalism	Oxford	2	Jun-63	58	First published in United Kingdom	Niko Pfund, Publisher, Academic
WST8004 -		Visual Methodologies: An Introduction to the Interpretation of Visual Materials Researching visual materials (2007)	SAGE	2	1-27 74-106	60	First published in United Kingdom	Huw Alexander, Rights & Digital Sales Manager
Feminist Methodologies	Talburt	Feminist Approaches to Theory and Methodology	Oxford	1	15-28 135-178	58	TX 5-027-371	Sherith Pankratz, Editor, Higher Education
EPY7090 - Learning and the Learner	Kruger***	Awakening Children's Minds	Oxford	1 (plus add'l partial chapter)	181-199 200-219	39	TX 5-335-981	Joan Bossert, Editor, Medical
PHIL4085 - Marx, Nietzsche, Freud	Berry***	Phenomenology of Spirit	Oxford	Unspecified	Unspecified	Unspecified	Registration pending	Niko Pfund, Publisher, Paperback