EXHIBIT G

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

CAMBRIDGE UNIVERSITY PRESS, et al,

Plaintiffs,

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

-VS.-

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

Defendants.

PLAINTIFFS' THIRD REQUESTS FOR THE PRODUCTION OF DOCUMENTS FROM DEFENDANTS

PLEASE TAKE NOTICE that, pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure and Rule 26 of this Court's Local Civil Rules, Plaintiffs Cambridge University Press, Oxford University Press, Inc., and SAGE Publications, Inc., by and through their undersigned counsel, hereby request that Defendants Mark P. Becker, Ron Henry, Nancy Seamans, J.L. Albert, Kenneth R. Bernard, Jr., James A. Bishop, Hugh A. Carter, Jr., William H. Cleveland, Robert F. Hatcher, Felton Jenkins, W. Mansfield Jennings, Jr., James R. Jolly, Donald M. Leebern, Jr., Elridge McMillan, William NeSmith, Jr., Doreen Stiles Poitevint,

Willis J. Potts, Jr., Wanda Yancey Rodwell, Kessel Stelling, Jr., Benjamin J. Tarbutton, III, Richard L. Tucker, and Allan Vigil (collectively, "Defendants") produce and permit the inspection and copying of all the documents hereinafter described at the offices of Bondurant, Mixson & Elmore, LLP, 1201 West Peachtree Street, N.W., Suite 3900, Atlanta, Georgia 30309.

DEFINITIONS

- 1. "All" and "each" shall be construed as all and each.
- 2. "Document(s)" shall be defined to be synonymous in meaning and equal in scope to the usage of this term in Federal Rule of Civil Procedure 34(a), and, for clarity, shall include any written, recorded, graphic, or other matter, whether sent or received or made or used internally, however produced or reproduced and whatever the medium on which it was produced or reproduced (whether on or in paper, cards, charts, files, printouts, tapes, discs, belts, video tapes, audiotapes, tape recordings, cassette, or other types of voice recording or transcription, computer tapes, databases, e-mails, pictures, photographs, slides, films, microfilms, motion pictures or any other medium), and any other tangible item or thing of readable, recorded, or visual material of whatever nature including originals, drafts, and all non-identical copies of each document (which, by reason of any variation, such as the presence or absence of hand-written notes or

underlining, represents a distinct version). By way of example, the term "document(s)" as used herein shall include, without limitation: correspondence; memoranda; notes; diaries; letters; telegraphs; telegrams; telexes; e-mails; minutes; agendas; contracts; reports; studies; checks; statements; receipts; returns; summaries; pamphlets; circulars; press releases; advertisements; books; prospectuses; inter-office and intra-office communications; handwritten or typewritten notes; notations or summaries of telephone conversations, meetings, or conferences; bulletins; computer printouts; databases; teletypes; telefax; invoices; worksheets; constitutions; by-laws; charters; resolutions; photographs; tape recordings; and all other tangible items of readable, recorded, or visual material of any kind.

3. "ERes" shall mean the GSU Library electronic course reserves system, which is accessible at the GSU Library Internet home page.

INSTRUCTIONS

1. In responding to each request, you are required to furnish all documents that are available to you, including documents in the possession, custody, or control of your attorneys, agents, employees, accountants, consultants, representatives, or any other persons directly or indirectly employed by or connected with you or your attorneys and anyone else subject to your control.

- 2. This request includes all documents kept in electronic form, including, but not limited to, electronic mail files, databases and other electronically stored information and records, Internet web pages and html files, files stored on a computer hard drive or server, and documents kept on a computer disk, CD-ROM, flash drive, or the like. If a document or communication exists only in electronic form, please convert a copy of the document into legible printed form and also provide a copy thereof in native-format computer-readable form and indicate which software application(s) were used to create the document and/or can be used to read the document.
- 3. Notwithstanding Instruction No. 2, Plaintiffs will meet and confer with Defendants concerning the production of responsive documents in a mutually agreed electronic format.
- 4. If any document or communication requested herein is withheld on the ground that it is privileged or upon any other ground that it is not subject to discovery, indicate in writing, with respect to each such document or communication: (a) the factual and legal bases for claiming the privilege or other ground relied upon; (b) the name and position of each person who prepared the document or communication and each person (if any) who signed it; (c) the name and position of each person to whom the document or communication was

directed, circulated, or distributed; (d) the date of the document or communication; and (e) the subject matter of the document or communication.

- 5. If any document cannot be produced in full, produce it to the extent possible, specifying your reasons for your inability to produce the remainder and stating whatever information, knowledge, or belief you have concerning the unproduced portion. Any purportedly privileged document containing non-privileged matter shall be produced with the purportedly privileged portion excised. You shall identify the specific location on each page where any purportedly privileged matter has been excised.
- 6. If and to the extent any request is objected to, state with specificity all grounds for the objection. Any ground not stated within the time prescribed by the Federal Rules of Civil Procedure, or any extensions thereof, shall be waived.
- 7. Each request herein for a document or documents to be produced contemplates production of the document in its entirety without abbreviation or expurgation. Each and every non-identical copy of a document (whether different from the original because of stamps, indications of receipt, handwritten notes, marks, attachment to different documents or any other reason) is a separate document to be produced.

- 8. All documents should be produced as they are kept in the ordinary course of business, or shall be organized and labeled to correspond to the specific paragraph(s) to which they are responsive. If producing the documents requested as they are kept in the ordinary course of business, the integrity and internal sequence of the requested documents within each file or folder shall not be disturbed nor shall the contents of any file or folder be commingled with the contents of another file or folder.
- 9. Each document request is a continuing one. If, after producing documents, you obtain or become aware of any further documents responsive to these requests, you are requested to produce such additional documents.

DOCUMENTS TO BE PRODUCED

- 1. All documents identified in Exhibit A to these Requests in their native portable document format as they are stored on the ERes server(s).
- 2. A copy of the entire book (or other purchased copy) from which each of the excerpts identified in Exhibit A to these Requests was copied and/or scanned.
- 3. A copy of the entire book (or other purchased copy) from which each of the excerpts identified in Exhibit B to these Requests was copied and/or scanned.

Respectfully submitted this 21st day of April, 2009.

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Georgia Bar No. 556052

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Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing PLAINTIFFS'

THIRD REQUESTS FOR THE PRODUCTION OF DOCUMENTS FROM

DEFENDANTS on counsel of record by hand delivery addressed as follows:

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

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

This 21st day of April, 2009.

John H. Rains IV

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Practicum (AL8900), fall 2007	Focus on the Language Classroom	Receptivity the issues involved (Ch. 9), Receptivity some relevant research (Ch. 10)	Richard Allwright & Kathleen M. Bailey
African-American Male/Female Relationships (AAS4030), fall 2007	The Slave Community: Plantation Life in the Antebellum South	The Slave Family (Ch. 4)	John W. Blassingame
African-American Male/Female Relationships (AAS4030), spring 2008 African-American Family (AAS3000), spring 2008 African-American Male/Female Relationships (AAS4030), Spring 2009 – Dixon	The Slave Community: Plantation Life in the Antebellum South	The Slave Family (Ch. 4), Plantation Realities (Ch. 7)	John W. Blasingame
Ethnographic Approaches (EPRS8500) fall 2007 Qualitative / Interpretative research in Education I (EPRS8500), Spring 2009 – Esposito	Sage Handbook of Qualitative Research, Third Edition	Rethinking Critical Theory and Qualitative Research (Ch. 12)	Joe L. Kincheloe & Peter McLaren
		Narrative Inquiry (Ch. 25)	Susan Chase
Qualitative / Interpretive Research in Education I (EPS8500), fall 2007	Sage Handbook of Qualitative Research, Third Edition	Narrative Inquiry (Ch. 25)	Susan Chase
Women and Media (JOU4780)	Feminist Media Studies	Ch. 2, 3	Liesbet van Zoonan

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Qualitative Research in Education II (EPRS8510), spring 2008	Sage Handbook of Qualitative Research, Third Edition	Writing a Method of Inquiry (Ch. 38)	Laurel Richardson & Elizabeth Adams St. Pierre
Qualitative Research in Education II, Spring 2009 – Kaufmann			
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Qualitative / Interpretive Research in Education I (EPS8500), Fall 2008 – Kaufmann Qualitative / Interpretative research in Education I (EPRS8500), Spring	The Sage Handbook of Qualitative Research	Narrative Inquiry: Multiple lenses, approaches, voices	S. Chase; Norman Denzin & Yvonne Lincoln (Eds.)
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Women and Media (JOU4780), Spring 2009 – Meyers	Feminist Media Studies	Feminist Media Studies (Ch. 3)	Liesbet van Zoonen
Life Course Sociology (SOCI8102), Spring 2009 – Burgess	Methods of Life Course Research: Qualitative and Quantative Approaches	Methods of Life Course Research: Qualitative and Quantative Approaches (Ch. 1)	Giele, Janet Zollinger & Glen H. Elder
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Interpretative Research in Education I (EPRS8500), Spring 2009 – Esposito	of Qualitative Research	qualitative research	McLaren; N. Denzin & Y. Lincoln (Eds.)
Adolescent Development (PSYC8662), Spring 2009 – Kuperminc	Handbook of Youth Mentoring	Integration of Mentoring with Other Programs and Services	Gabriel Kuperminc, et al.; David Dubois & Michael Karcher (Eds.)
Qualitative / Interpretative Research in Education I (EPRS8500), Spring 2009 – Esposito	Designing Qualitative Research	The how of the study: Building the research design (Ch. 3) Data collection methods (Ch. 4)	Catherine Marshall & Gretchen Rossman
Criminological Theory (CRJU8050), Spring 2009 – Brezina	Of Crime and Criminality	Understanding Illicit Drug Use	Paul Mazerolle; Sally S. Simpson (Ed.)
Qualitative / Interpretative research in Education I (EPRS8500), Spring 2009 – Esposito	Phenomenological research methods	Human science perspectives and models (Ch. 1) Phenomenology and human science inquiry (Ch. 3)	Clark Moustakas
Qualitative / Interpretative research in Education I (EPRS8500), Spring 2009 – Esposito	Handbook of Ethnography	The call of life stories in ethnographic research (Ch 27)	K. Plummer Paul Adkinson (Ed.)
Women and Media (JOU4780), Spring 2009 – Meyers	Gender, Race & Class in Media: A Text Reader	Pornography and Male Supremacy	Andrea Dworkin; Dines & Humez (Eds.)
Qualitative Research in Education II (EPRS8510), Spring 2009 – Kaufmann	The Sage Handbook of Qualitative Research	Writing as a method of inquiry	L. Richardson; Norman Denzin & Yvonne Lincoln (Eds.)
Audiences Studies (COMM8120), Spring 2009 – Fujioka	Rethinking the media audience: The new agenda	The best of both worlds? Media Audience research between rival paradigms	K.C. Schroder; P. Alasuutari (Ed.)
Women and Media (JOU4780), Spring 2009 – Meyers	Gender, Race & Class in Media: A Text Reader	Women Read the Romance	Janice Radway; Dines & Humez (Eds.)

COURSE	воок	EXCERPT	AUTHOR
Qualitative / Interpretative research in Education I (EPRS8500), Spring 2009 – Esposito	Applications of case study research	Computer implementation in a local computer system (Ch. 3)	Robert Yin
Exploring Learning and Teaching (ED2130), Spring 2009 – Ambrosino, Bays, Zabrucky	Educational Psychology in Context	What makes a good teacher (Ch. 4)	
Audiences Studies (COMM8120), Spring 2009 – Fujioka	Mass communication and society	Culture, the media and the ideological effect	S. Hall; J. Curran, M. Gurevitch & J. Woolacott (Eds.)
20 th Century Music (MUS8870), Summer 2007 – Orr	Cambridge Companion to Bartok	Cambridge Companion to Bartok	
20 th Century Music (MUS8870), Summer 2007 – Orr	Cambridge Companion to Berg.	Cambridge Companion to Berg.	
20 th Century Music (MUS8870), Summer 2007 – Orr	Cambridge Companion to Ravel	Cambridge Companion to Ravel	
Practicum (AL8900), Fall 2008 – Belcher, Larsson, Moran, Murphy, Snell, Stowe Practicum (AL8900), Spring 2009 - Belcher, Larsson, Moran,	Understanding Communication in Second Language Classrooms	Communication in Second Language Classrooms	Karen E. Johnson
Murphy, Snell, Stowe Introduction to Historical Research / Historiography, Theory, and Methods (HIST8000), Fall 2007 – Perry Introduction to	The Invention of Tradition	Introduction: Inventing Traditions	Eric Hobsbawm; Hobsbawm & Terrence Ranger (Eds.)
Historical Research / Historiography, Theory			

COURSE	ВООК	EXCERPT	AUTHOR
and Methods			
(HIST8000), Spring			
2009 – Perry			
Practicum (AL8900),	Focus on Language	Focus on Language in the	Allwright & Bailey
Fall 2008 – Belcher,	in the Classroom	Classroom (Ch. 10)	
Larsson, Moran,			
Murphy, Snell, Stowe			
Practicum (AL8900),			
Spring 2009-Belcher,			
Larsson, Moran,			
Murphy, Snell, Stowe			
Practicum (AL8900),	Focus on Language	Focus on Language in the	Allwright & Bailey
Fall 2008 – Belcher,	in the Classroom	Classroom (Ch. 9)	
Larsson, Moran,			
Murphy, Snell, Stowe			
Practicum (AL8900),			
Spring 2009 - Belcher,			
Larsson, Moran,			
Murphy, Snell, Stowe			
Advanced	Language	Individuation, relativity and	D. Gentner & L.
Development	acquisition and	early word learning	Boroditsky;
Psychology: Cognition	conceptual		M. Bowerman &
and Intellect (EPY8200),	development		S. Levinson (Eds.)
Fall 2008 - Anggoro			
Advanced			
Development			
Psychology: Cognition			
and Intellect (EPY8200),			
Spring 2009 - Anggoro			
Practicum (AL8900),	Language Teacher	Problem Posing and Solving with	Jerry Gebhard
Fall 2008 – Belcher,	Awareness	Action Research	
Larsson, Moran,			
Murphy, Snell Stowe			
Practicum (AL8900),			
Spring 2009– Belcher,			
Larsson, Moran,			
Murphy, Snell Stowe			

COURSE	ВООК	EXCERPT	AUTHOR
Practicum (AL8900), Fall 2008 – Belcher, Larsson, Moran, Murphy, Snell, Stowe	Second Language Teacher Education	Teacher Observation in Second Language Teacher Education	Richard Day; Richards & Nunan (Eds.)
Practicum (AL8900), Spring 2009 – Belcher, Larsson, Moran Murphy, Snell, Stowe			
Social and Personality Development (EPY8220), Fall 2008 – Garfin, Kruger, Samuelson	Understanding trauma: Integrating biological, clinical and cultural perspectives	The developmental impact of childhood trauma	B.A. van der Kolk; L.J. Kirkmayer, R. Lemelson & M. Barad (Eds.)
International Political Economy (POLS8430), Spring 2009 – Hankla	The IMF and Economic Development	The IMF and Economic Development	James Raymond Vreeland
Senior Seminar (ENGL4300), Spring 2008 – Goodman	Reading the West	Region, Power, Place	William W. Bevis; Michael Kowalewski (Ed.)
Native American Literature (ENGL4300), Spring 2009 – Goodman			
Seminar in Modern Philosophy (PHIL8060), Spring 2009 – Merritt	Cambridge Companion to Adam Smith	Sympathy and the Impartial Spectator	Alezander Broadie
Seminar in Modern Philosophy (PHIL8060), Spring 2009 – Merritt	Adam Smith and the Virtues of Enlightenment	Chapter 8	Charles Griswold
Seminar in Modern Philosophy (PHIL8060), Spring 2009 - Merritt	The Hellenistic Philosophers Volume 1: Translations of the Principle Sources with Philosophical Commentary	Stoic Ethics	A.A. Long & D.N. Sedley
Seminar in Modern Philosophy (PHIL8060), Spring 2009 – Merritt	Aristotle, Kant, and the Stoics: Rethinking Happiness and Duty	Eudaimonism, the Appeal to Nature and a Moral Duty in Stoicism	John Cooper; S. Engstrom & J. Whiting (Eds.)

COURSE	воок	EXCERPT	AUTHOR
Philosophy (PHIL4010), Spring 2009 – O'Keefe	The Cambridge Companion to Plato	Disintegration and Restoration: Pleasure and Pain in Plato's Philebus	Dorothea Frede; Richard Kraut (Ed.)
Early Modern Europe , 1500-1789 (HIST3520), Spring 2009 – Selwood	Christianity in the West	Christianity in the West (Ch. 2)	John Bossey
Film Theory and Criticism (FILM4750), Spring 2009 – Ayers & Raengo	Film Theory and Criticism	The Art of Cinema as a Mode of Film Practice	David Bordwell; Braudy & Cohen (Eds.)
Intro to Historical Studies (HIST3000), Spring 2009 – Selwood	Histories	Histories	Herodotus
Early Modern Europe, 1500-1789 (HIST3520), Spring 2009 – Selwood	Christianity in the West	Christianity in the West (Ch. 1)	John Bossey
Film Theory and Criticism (FILM4750), Spring 2009 – Ayers & Raengo	Film Theory and Criticism	The Ontology of the Photographic Image	Andre Bazin; Braudy & Cohen (Eds.)
Introduction to Historical Research / Historiography, Theory and Methods (HIST8000), Spring 2009 -Perry	Disorderly Conduct: Visions of Gender in Victorian America	Hearing Women's Words: A Feminist Reconstruction of History	Carroll Smith- Rosenberg
Women and Media (JOU4780), Spring 2009 – Meyers	Hearth and Home	The Symbolic Annihilation of Women by Mass Media	Tuchman (Ed.)
Advanced Developmental Psychology: Cognition and Intellect (EPY8200), Spring 2009 – Anggoro	The Foundations	Perceptual meaning analysis and image-schemas	J.M. Mandler
Feminist Methodologies (WST8004), Spring 2009 – Talburt	Feminist Approaches to Theory and Methodology: An Interdisciplinary Reader	Feminist History after the Linguistic Turn	Kathleen Canning; Sharlene Hesse- Biber, Christina Gilmartin & Robin Lynderberg (Eds.)
Survey of World History since 1500 (HIST1112),	Persistent Poverty: Underdevelopment	Persistent Poverty: Underdevelopment in Plantation	George Beckford

COURSE	воок	EXCERPT	AUTHOR
Spring 2009 – Gainty	in Plantation Economies of the Third World	Economies of the Third World	
Seminar in Modern Philosophy (PHIL8060), Spring 2009 – Merritt	Oxford Philosophical Texts	Treatise of Human Nature	David Hume; David Fate Norton & Mary J. Norton (Eds.)
Social Theory II (SOCI9030), Spring 2009 – Harvey	Readings in Social Theory 3 rd edition	Philosophy and Critical Theory	Herbert Marcuse; Peter Kivisto (Ed.)
Sound System of English (AL8320), Spring 2009 – Grant, Murphy	Teaching American English Pronunciation	Pronunciation syllabus design: a question of focus	Suzanne Firth P. Avery & S. Ehrlich (Eds.)
Advanced Developmental Psychology: Cognition and Intellect (EPY8200), Spring 2009 – Anggoro	The foundations of mind: Origins of conceptual thought	How to build a baby	J.M. Mandler
Social Theory II (SOCI9030), Spring 2009 – Harvey	Readings on Social Theory 3 rd Edition	On Systematically Distorted Communication	Jurgen Habermas; Peter Kivisto (Ed.)
Social Theory II (SOCI9030), Spring 2009 – Harvey	Readings on Social Theory 3 rd Edition	Studies of the Routine Grounds of Everyday Activities	Harold Garfinkel; Peter Kivisto (Ed.)
Seminar in Modern Philosophy (PHIL8060), Spring 2009 – Merritt	Oxford Philosophical Texts	Treatise of Human Nature	David Hume; David Fate Norton & Mary J. Norton (Eds.)
Sound System of English (AL8320), Spring 2009 – Grant, Murphy	Teaching American English Pronunciation	Introduction: Pre-pronunciation Considerations	P. Avery & S. Erlich
Social Theory II (SOCI9030), Spring 2009 – Harvey	Readings in Social Theory, 3 rd Edition	Social Behavior as Exchange	George C. Homans; Peter Kivisto (Ed.)
Seminar in Modern Philosophy (PHIL8060), Spring 2009 – Merritt	Enquiry Concerning the Principles of Morals	Section 1	David Hume; Tom Beauchamp (Ed.)
Seminar in Modern Philosophy (PHIL8060), Spring 2009 – Merritt	Topics in Stoic Phiosophy	On the Stoic Conception of the Good	Michael Frede

COURSE	ВООК	EXCERPT	AUTHOR
Introduction to	Myths and	Introduction: Ethno-symbolism	Anthony Smith
Historical Research /	Memories of the	and the Study of Nationalism	
Historiography, Theory,	Nation		
and Methods		Gastronomy or Geology? The	
(HIST8000), Spring		Role of Nationalism in the	
2009 – Perry		Reconstruction of Nations	
African Americans in	The signifying	Selections	Henry Louis Gates
Film (FILM4760), Spring	monkey: a theory		
2009 – Raengo	of Afro-American		
	literary criticism		
Applied Biocultural	Anthropology in	Neglect of Cultural Knowledge in	Judith Justice;
Anthropology	Public Health	Health Planning: Nepal's	Robert A. Hahn
(ANTH4350), Spring		Assistant Nurse-Midwife	(Ed.)
2009 – McCombie		Program	
Sound System of	Teaching American	Spelling and Pronunciation	P. Avery & S.
English (AL8320),	English		Ehrlich
Spring 2009 – Grant,	Pronunciation		
Murphy			
Sound System of	ELT Journal	Which pronunciation norms and	J. Jenkins
English (AL8320),		models for English as an	
Spring 2009 – Grant,		International Language?	
Murphy			
Audience Studies	A companion to	The changing nature of	S. Livingstone
(COMM8120), Spring	media studies	audiences: From the mass	A. Valdivia (Ed.)
2009 – Fujioka		audience to the interactive	
		media user	