

**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

**DECLARATION OF EDWARD B. KRUGMAN**

I, Edward B. Krugman, declare as follows:

1. I am a partner in the law firm Bondurant, Mixson & Elmore LLP, counsel to Plaintiffs in this action. I submit this declaration in support of Plaintiffs' Memorandum of Law in Opposition to Defendants' Renewed Motion for Protective Order.

2. I make this declaration based upon my own knowledge and that of my firm.

3. Attached as Exhibit A is a true and correct copy of the transcript of the deposition of Marjorie Denise Dimsdale, taken May 13, 2009.

4. Attached as Exhibit B is a true and correct copy of the transcript of the deposition of Jodi Kaufmann, taken May 6, 2009.

5. Attached as Exhibit C is a true and correct copy of the Summer 2007 syllabus for “Qualitative / Interpretive Research in Education I,” bearing the Bates No. GaState0003766–75.

6. Attached as Exhibit D is a true and correct copy of a PowerPoint presentation entitled “Copyright in Instruction & the New USG Copyright Policy,” bearing the Bates No. GaState0021120–48.

7. Attached as Exhibit E is a true and correct copy of the transcript of the deposition of Laura Burtle, taken April 24, 2009.

8. Attached as Exhibit F is a true and correct copy of the Spring 2009 syllabus for “Practicum in ESL/EFL Teaching CRN 11577,” bearing the Bates No. GaState0046249–59.

9. Attached as Exhibit G is a true and correct copy of the transcript of the deposition of Diane Belcher, taken May 7, 2009.

10. Attached as Exhibit H is a true and correct copy of an email from Jim Palmour to Nancy Kropf, dated October 31, 2006, and bearing the Bates No. GaState0004844-45.

11. Attached as Exhibit I is a true and correct copy of an email from Marian Meyers to libreserves@langare.gsu.edu, dated January 2, 2007, bearing Bates No. GaState0003395.

12. Attached as Exhibit J is a true and correct copy of the transcript of the deposition of William Potter, taken March 9, 2009.

13. Attached as Exhibit K is a true and correct copy of the transcript of the deposition of Nancy Seamans, taken March 10, 2009.

14. Attached as Exhibit L is a true and correct copy of the transcript of the deposition of James Palmour, taken April 23, 2009.

15. Attached as Exhibit M is a true and correct copy of excerpts from Defendants' Responses to Plaintiffs' First Set of Interrogatories to Defendants, dated August 27, 2008.

16. Attached as Exhibit N is a true and correct copy of excerpts from Defendants' Amended and Supplemental Responses to Plaintiffs' First Set of Interrogatories to Defendants, dated May 19, 2009.


17. Attached as Exhibit O is a true and correct copy of Plaintiffs' Second Requests for the Production of Documents, dated January 30, 2009.

18. Attached as Exhibit P is a true and correct copy of a letter from Edward B. Krugman to Anthony B. Askew, dated April 13, 2009.

19. Attached as Exhibit Q is a true and correct copy of a letter from John H. Rains to Kristen A. Swift, dated April 22, 2009.

20. Attached as Exhibit R is a true and correct copy of a letter from Laura Gary to Randi W. Singer, dated May 15, 2009.

Dated: Atlanta, Georgia  
May 21, 2009



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Edward B. Krugman