

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

CODE REVISION COMMISSION on
behalf of and for the benefit of THE
GENERAL ASSEMBLY OF
GEORGIA, and THE STATE OF
GEORGIA,

Plaintiff,

v.

PUBLIC.RESOURCE.ORG, INC.

Defendant.

CIVIL ACTION NO.

1:15-CV-2594-RWS

**JOINT MOTION FOR ENTRY OF
PROPOSED PERMANENT INJUNCTION ORDER**

Plaintiff and Counterclaim-Defendant the Code Revision Commission, on behalf of and for the benefit of the General Assembly of Georgia, and the State of Georgia (“Commission”), and Defendant and Counterclaim-Plaintiff Public.Resource.Org, Inc. (“Public Resource”) jointly move for the Court to enter the below Proposed Permanent Injunction Order following this Court’s Order on March 23, 2017 (Dkt. No. 44) granting Commission’s Motion for Partial Summary Judgment. On March 23, 2017, upon learning of the Court’s Order, Public Resource took down all versions of the O.C.G.A. from its website and any other website within its possession, custody, or control. Public Resource has also

removed all fundraising solicitations for its use of the O.C.G.A. from its website and any other website within its possession, custody, or control and from its web server.

The Parties submit this Joint Motion in lieu of a proposed briefing schedule to address the injunctive relief to which Commission is entitled.

Respectfully submitted, this 6th day of April, 2017.

/s/Anthony B. Askew

Anthony B. Askew (G.A. Bar: 025300)
Lisa C. Pavento (G.A. Bar: 246698)
Warren Thomas (G.A. Bar: 164714)
Meunier Carlin & Curfman LLC
999 Peachtree Street, NE, Suite 1300
Atlanta, Georgia 30309
Phone: 404-645-7700
Fax: 404-645-7707
taskew@mcciplaw.com
lpavento@mcciplaw.com
wthomas@mcciplaw.com

*Counsel for the Plaintiff, Code Revision
Commission on behalf of and for the
benefit of the General Assembly of
Georgia, and the State of Georgia*

/s/Elizabeth H. Rader (w/express
permission)

Elizabeth H. Rader (*pro hac vice*)
ALSTON & BIRD LLP
950 F Street, NW
Washington, DC 20004
Telephone: 202-239-3008
Fax: (202) 239-3333
elizabeth.rader@alston.com

Jason D. Rosenberg
Georgia Bar No. 510855
Sarah Parker LaFantano
ALSTON & BIRD LLP
One Atlantic Center
1201 West Peachtree Street
Atlanta, GA 30309-3424
Telephone 404-881-7461
Fax (404) 253-8861
jason.rosenberg@alston.com
sarah.lafantano@alston.com

*Counsel for the Defendant,
Public.Resource.Org*

CERTIFICATE OF COMPLIANCE

I hereby certify that, pursuant to L.R. 5.1C and 7.1D of the Northern District of Georgia, the foregoing JOINT MOTION FOR ENTRY OF PROPOSED PERMANENT INJUNCTION ORDER complies with the font and point selections approved by the Court in L.R. 5.1C. The foregoing pleading was prepared on a computer using 14-point Times New Roman font.

/s/Anthony B. Askew
Anthony B. Askew (G.A. Bar: 025300)
Meunier Carlin & Curfman LLC
999 Peachtree Street NE, Suite 1300
Atlanta, Georgia 30309
Telephone: 404-645-7700
Email: taskew@mcciplaw.com

CERTIFICATE OF SERVICE

I certify that on April 6, 2017, I electronically filed the foregoing JOINT MOTION FOR ENTRY OF PROPOSED PERMANENT INJUNCTION ORDER with the Clerk of Court using the CM/ECF system, which constitutes service of the filed document on all counsel of record in this proceeding under LR 5.1(A)(3), N.D. Ga.

By: /s/Anthony B. Askew
Anthony B. Askew (G.A. Bar: 025300)