

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

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AMERICAN EDUCATIONAL RESEARCH ASSOCIATION, INC., AMERICAN PSYCHOLOGICAL ASSOCIATION, INC., and NATIONAL COUNCIL ON MEASUREMENT IN EDUCATION, INC.,)	Civil Action No. 1:14-cv-00857-TSC-DAR
Plaintiffs/Counterclaim Defendants,)	
)	
v.)	
)	
PUBLIC.RESOURCE.ORG, INC.,)	
Defendant/Counterclaimant.)	JOINT STIPULATION REGARDING EXTENSION OF FACT AND EXPERT DISCOVERY DEADLINES
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Counsel for Plaintiffs American Educational Research Association, Inc. (“AERA”), American Psychological Association, Inc. (“APA”), and the National Council on Measurement in Education, Inc. (“NCME”), and Defendant Public.Resource.Org (“Public Resource”) hereby submit the following Stipulation, and respectfully request the Court’s approval of the discovery and pre-trial schedule provided below.

1. Plaintiffs’ Amended Motion to Compel Discovery, Privilege Log, and Further Initial Disclosures (Dkt. No. 27 – “Discovery Motion”) and the parties’ Consent Motion to Extend Time for Discovery and Case Schedule (Dkt. No. 42 – “Motion re Case Schedule”) are pending before the Court. The parties’ await rulings on these motions.

2. As requested in the parties’ Motion re Case Schedule, and in order to allow for the diligent and orderly completion of discovery, the parties have stipulated that the fact and expert discovery deadlines in this case should be extended according to the schedule listed below:

	Current Date (per Dkt. No. 22)	Stipulated Date
Close of Fact Discovery	March 16, 2015	May 18, 2015
Opening Expert Disclosures	April 15, 2015	June 15, 2015
Rebuttal Expert Disclosures	May 15, 2015	July 15, 2015
Replies to Rebuttal Disclosures	May 29, 2015	July 29, 2015
Final Replies to Expert Disclosures	June 12, 2015	August 12, 2015
Close of Discovery	July 13, 2015	September 12, 2015
Post-Discovery Conference	July 15, 2015	September 15, 2015

3. Pending the Court’s rulings as noted above, the parties continue in their efforts to complete discovery, including depositions.

IT IS SO STIPULATED.

Dated: April 15, 2015

OBLON, MCCLELLAND, MAIER & NEUSTADT, LLP

By: /s/ Jonathan Hudis
Jonathan Hudis

Attorneys for Plaintiffs
AMERICAN EDUCATIONAL RESEARCH
ASSOCIATION, INC., AMERICAN
PSYCHOLOGICAL ASSOCIATION, INC., and
NATIONAL COUNCIL ON MEASUREMENT
IN EDUCATION, INC.

Dated: April 15, 2015

FENWICK & WEST LLP

By: /s/ Andrew P. Bridges
Andrew P. Bridges

Attorneys for Defendant
PUBLIC.RESOURCE.ORG

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

AMERICAN EDUCATIONAL RESEARCH)	
ASSOCIATION, INC., AMERICAN)	Civil Action No. 1:14-cv-00857-TSC-DAR
PSYCHOLOGICAL ASSOCIATION, INC.,)	
and NATIONAL COUNCIL ON)	
MEASUREMENT IN EDUCATION, INC.,)	[PROPOSED] ORDER GRANTING
)	JOINT STIPULATION REGARDING
Plaintiffs/Counterclaim Defendants,)	EXTENSION OF FACT AND EXPERT
)	DISCOVERY DEADLINES
v.)	(DKT. NO. __)
)	
PUBLIC.RESOURCE.ORG, INC.,)	
)	
Defendant/Counterclaimant.)	
)	

Having fully considered the Joint Stipulation to Extend Fact and Expert Discovery Deadlines (Dkt. No. __), and for good cause shown, it is hereby

ORDERED that the Joint Stipulation to Extend Fact and Expert Discovery Deadlines (Dkt. No. __) is **GRANTED**, and it is further

ORDERED that the fact and expert discovery deadlines herein are extended as follows:

	Current Date (per Dkt. No. 22)	Stipulated Date
Close of Fact Discovery	March 16, 2015	May 18, 2015
Opening Expert Disclosures	April 15, 2015	June 15, 2015
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Dated: _____

Hon. Deborah A. Robinson
United States Magistrate Judge

CERTIFICATE OF SERVICE

I hereby certify that on April 15, 2015, the foregoing **JOINT STIPULATION REGARDING EXTENSION OF FACT AND EXPERT DISCOVERY DEADLINES** was filed using the CM/ECF system that sent notice of the filing of these documents to all counsel of record, and was also served via e-mail to:

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PUBLIC.RESOURCE.ORG, INC.

/s/ Jonathan Hudis

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