

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

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/Counterdefendants,)

v.)

PUBLIC.RESOURCE.ORG, INC.,)

Defendant/Counterclaimant.)

**JOINT MOTION AND PROPOSED ORDER TO EXTEND THE DATE ON WHICH
EXPERT DEPOSITION MAY BE TAKEN**

STIPULATION

Counsel for Defendant Public.Resource.Org (“Public Resource”) and Plaintiffs American Educational Research Association, Inc. (“AERA”), American Psychological Association, Inc. (“APA”), and the National Council on Measurement in Education, Inc. (“NCME”) respectfully move to extend the deadline for the deposition of Plaintiffs’ expert witness Dr. Phillips to allow the deposition to be completed on September 22, 2015 in Phoenix, AZ.

Pursuant to LCvR 7(m), counsel for the parties discussed this motion and mutually agree to it. The parties agree that this deposition schedule allows the parties to conduct this deposition in a reasonable manner while accommodating the witness’ and counsels’ various schedules. The extension of the deadline for the taking of the deposition of Dr. Phillips does not affect other deadlines set in this case.

Fact discovery in this action closed on May 18, 2015. The parties further agree that the closing date for all other expert discovery to be taken in this action remains as September 11, 2015, as directed by the Court's Order of June 11, 2015 (Dkt. 53).

The parties respectfully ask the court to extend the deadline to take Dr. Phillips’s deposition until September 22, 2015.

Dated: September 10, 2015

FENWICK & WEST LLP

By: /s/ Matthew B. Becker
Andrew P. Bridges
Matthew B. Becker

DAVID HALPERIN
David Halperin

ELECTRONIC FRONTIER FOUNDATION
Corynne McSherry
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Attorneys for Defendant
PUBLIC.RESOURCE.ORG, INC.

Dated: September 10, 2015

QUARLES & BRADY 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.

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Case No. 1:14-cv-00857-TSC-DAR

**[PROPOSED] ORDER GRANTING
JOINT MOTION TO EXTEND THE
DATE ON WHICH EXPERT
DEPOSITION MAY BE TAKEN
(DKT. NO. 55)**

Having fully considered the Joint Motion to Extend the Date on Which Expert Deposition May Be Taken (Dkt. 55), and for good cause shown, it is hereby

ORDERED that the Joint Motion to Extend the Date on Which Expert Deposition May Be Taken (Dkt. 55) is **GRANTED**.

Dated: _____

Hon. Deborah A. Robinson
United States Magistrate Judge