

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.,

Plaintiffs,

v.

PUBLIC.RESOURCE.ORG, INC.,

Defendant.

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

**MOTION OF THE REPORTERS COMMITTEE FOR FREEDOM OF THE PRESS FOR
LEAVE TO FILE BRIEF AS *AMICUS CURIAE* IN SUPPORT OF DEFENDANT'S
MOTION FOR SUMMARY JUDGMENT AND IN OPPOSITION TO PLAINTIFFS'
MOTION FOR SUMMARY JUDGMENT AND FOR A PERMANENT INJUNCTION**

The Reporters Committee for Freedom of the Press (“Reporters Committee”) hereby requests permission to submit the attached brief as *amicus curiae* in support of Defendant’s motion for summary judgment and in opposition to Plaintiffs’ motion for summary judgment and for a permanent injunction. The Reporters Committee is an unincorporated nonprofit association of reporters and editors dedicated to safeguarding the First Amendment rights and freedom of information interests of the news media and the public. The Reporters Committee has provided assistance, guidance, and research in First Amendment and freedom of information litigation since 1970.

The Reporters Committee submits the attached brief to aid the Court in understanding the First Amendment issues raised by the current litigation from the viewpoint of the news media. The Reporters Committee has informed all parties to this matter of its intent to submit the attached brief. Plaintiffs and Defendant have consented to its filing.

For the foregoing reasons, the Reporters Committee respectfully requests leave to file the attached brief.

Dated: February 11, 2016

/s/ Bruce D. Brown
Bruce D. Brown (D.C. Bar No. 57317)
THE REPORTERS COMMITTEE
FOR FREEDOM OF THE PRESS
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CERTIFICATE OF SERVICE

I hereby certify that on February 11, 2016, the foregoing document was filed electronically with the Clerk of the Court through the Court's CM/ECF system, which will automatically serve all counsel of record.

Dated: February 11, 2016

/s/ Bruce D. Brown

Bruce D. Brown (D.C. Bar No. 57317)

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