EXHIBIT 2

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October 13, 2014

VIE EMAIL

Andrew Bridges
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Re: *American Society for Testing and Materials, et al v. Public.Resource.Org, Inc.,* Case No. 1:13-cv-01215-TSC - Discovery Issues

Dear Mr. Bridges:

This responds to your September 24, 2014 and October 8, 2014 letters. For the moment, ASTM will respond only to the points related to ASTM's proposed custodians and search terms and Public Resource's document production. There obviously continue to be a number of other issues about which ASTM and Public Resource disagree, which are now the subject of your motion to compel.

Search Terms and Custodians

Our August 28 letter asked you to raise any additional issues with our proposed search terms and custodians by September 3, 2014, so that we could begin to collect and produce documents in accordance with the court's schedule in this matter. Notwithstanding this request, you did not respond to our letter until September 24, at which point we had already collected the documents from the custodians we identified on August 28, 2014, using the search terms that we indicated we would use in that letter. We are in the process of reviewing and preparing these documents for production and expect to make an additional production this week. Any additional productions will be made on a rolling basis.

We believe that the individuals we identified and from whom we have collected documents for production are the individuals most likely to have non-privileged documents responsive to your

requests. In addition, we believe our August 28 letter adequately explained the reasons for our adoption of some, but not all, of the search terms you had previously proposed. Pursuant to your request and to the protective order issued by the court on September 23, 2014, we will include ASTM's organizational chart in our production. If, after reviewing the documents we produce, you have a basis for believing that additional custodians or search terms are necessary, we invite you to raise any such issues with us at that time.

Public Resource's Document Production

As we have previously discussed on multiple occasions, ASTM is attempting in good faith to work with Public Resource to select search terms and custodians that have a reasonable likelihood of identifying documents that are responsive to Public Resource's document requests without creating an undue burden. We believe that this type of cooperation is the most cost-effective way to search for documents. However, we remain disappointed that Public Resource does not appear to be reciprocating ASTM's efforts to cooperate. If it is Public Resource's intention to cooperate with the Plaintiffs in selecting search terms for all parties, ASTM is willing to engage in that process and has proposed reasonable terms for Public Resource's review. However, that process must be two-sided and Public Resource must engage in a good-faith, reasonable effort to cooperate.

We note, first of all, that Public Resource has produced some, but not all, of the categories of documents that it indicated it would produce in its responses to Plaintiffs' Requests for Production. Please confirm that Public Resource plans to make an additional production and let us know when to expect to receive those documents.

Second, in a letter dated May 2, 2014, Public Resource proposed search terms that were comprised of the names of the three Plaintiffs and acronyms/variations of these names, the name of one standard developed by one Plaintiff, and the acronym for that standard's name. These search terms were clearly inadequate, both overbroad and under-inclusive, and not designed to identify documents responsive to many of ASTM's requests for production, including most of the categories of documents Public Resource has agreed to produce. As discussed in our telephone conference and reiterated in my May 23, 2014 and August 28 letters, we expected that you would reconsider your proposed search terms to make sure they corresponded with the subject matter of ASTM's requests for production. Yet, based on your September 24 letter, you have not made any reasonable effort to provide terms that are designed to identify responsive materials.

The only search terms you proposed in your September 24 letter that relate to ASTM are "ASTM," "ASTM International," and "American Society for Testing and Materials." The only "new" term you included in your list that relates to ASTM that you had not previously proposed, "ASTM International," would have already been captured under a previously proposed term, "ASTM." Further, you have made absolutely no effort to select search terms that are designed to

identify documents responsive to many of ASTM's requests for production. For example, we would expect you to include terms similar to the following in any proposed list of search terms:

- incorporat! /5 reference
- incorporat! /5 standard OR code
- includ! /5 standard OR code
- standard! OR code /5 CFR
- licens! /5 standard OR code
- cop! /5 standard OR code
- post! /5 standard OR code
- download! /5 standard OR code
- website /5 standard OR code
- trademark /5 standard OR code
- reformat /5 standard OR code
- reformat /5 graphic OR code
- rekey /5 standard OR code
- "double key"
- retype /5 standard OR code
- convert /5 standard OR code
- convert /5 graphic
- convert /5 formula
- metadata /5 standard OR code
- "quality control"
- "quality assurance"
- donat! /5 standard OR code
- donat! /5 "incorporate by reference"
- donor /5 standard OR code
- donor /5 "incorporate by reference"
- contribut! /5 standard OR code
- contribut! /5 "incorporate by reference"
- fundraise /5 standard OR code
- fundraise /5 "incorporate by reference"
- kickstarter /5 "incorporate by reference"
- copyright /2 misuse
- trademark /2 misuse
- "fair use"
- use! /2 commerce
- injunction
- enjoin!

If Public Resource is interested in cooperating with respect to this important discovery issue, please provide a reasonable list of additional search terms as soon as possible. If we are not satisfied that your search terms are comprehensive and reasonably designed to identify documents that are responsive to ASTM's Requests for Production, we will not hesitate to seek the involvement of the court.

Sincerely,

J. Kevin Fee

JKF

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