

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

AMERICAN SOCIETY FOR TESTING AND  
MATERIALS d/b/a ASTM INTERNATIONAL;

NATIONAL FIRE PROTECTION  
ASSOCIATION, INC.; and

AMERICAN SOCIETY OF HEATING,  
REFRIGERATING, AND AIR CONDITIONING  
ENGINEERS,

Plaintiffs-Counterdefendants,

v.

PUBLIC.RESOURCE.ORG, INC.,

Defendant-Counterclaimant.

Case No. 1:13-cv-01215-TSC-DAR

**DECLARATION OF JOHN DOE IN  
SUPPORT OF DEFENDANT-  
COUNTERCLAIMANT  
PUBLIC.RESOURCE.ORG, INC.'S  
RESPONSE TO PLAINTIFFS'  
MOTION TO COMPEL DISCOVERY**

Filed: August 6, 2013

Using the pseudonym John Doe, instead of my actual name, in order to protect my identity pursuant to my rights under the First Amendment, I declare as follows:

1. I have personal knowledge of all matters set forth in this declaration.
2. I am providing this declaration under a pseudonym because I wish to protect my rights to free speech and participation in associational activities. A true and correct copy of my actual signature for this document resides with my attorneys.
3. Through a charitable foundation, I have donated substantial funds to Public Resource to support its activities. I gave these funds with the wish and expectation that my contribution would remain anonymous.
4. I have expressed to Carl Malamud, Public Resource's president, my wish that my contributions remain anonymous.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 10th day of January, 2015.

*/s/ John Doe /mls*  
\_\_\_\_\_  
John Doe

I am an attorney for the person making the foregoing declaration. I declare under penalty of perjury under the laws of the United States of America that the person identified herein as John Doe made the foregoing declaration, and that person's signed acknowledgement is on file at my office.

*/s/ Mitchell Stoltz*  
\_\_\_\_\_  
Mitchell Stoltz  
Electronic Frontier Foundation