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, INC.
 	
       Plaintiffs/Counter-defendants,
 	
 v.
 	
 PUBLIC.RESOURCE.ORG, INC.,
 	
       Defendant/Counterclaimant.
	Case No. 1:13-cv-01215-TSC-DAR
	
	 DECLARATION OF ANDREW P. BRIDGES IN SUPPORT OF PUBLIC.RESOURCE.ORG, INC.'S OPPOSITION TO NATIONAL FIRE PROTECTION ASSOCIATION, INC.'S MOTION TO AMEND COMPLAINT
	
	 Filed: August 6, 2013

I, Andrew P. Bridges, hereby declare pursuant to 28 U.S.C. § 1746 as follows:

1.   I am a member of the bar of the State of California and am admitted to practice before this Court. I am a partner in the law firm of Fenwick & West LLP and counsel of record for Defendant-Counterclaimant Public.Resource.Org, Inc. ("Public Resource"). I submit this declaration in support of Public Resource's Opposition to Plaintiffs-Counterdefendants' Amended Motion to Compel Discovery.

2.   National Fire Protection Association ("NFPA") first informed Public Resource that it intended to file a motion to amend the complaint to allege infringement of the 2014 National Electric Code ("NEC 2014") by email in the midst of the winter holidays, on December 30, 2014. NFPA did not follow up on this issue until two days before the close of discovery, on January 28, 2015. Public Resource replied to NFPA that it was concerned because Public

Resource "[did] not believe the current schedule allows for sufficient time to complete discovery on a new claim," but that if further discovery was allowed then Public Resource would not oppose NFPA's motion to amend the complaint. A true and correct copy of the email exchange with counsel for NFPA is attached as **Exhibit A**.

I declare under penalty of perjury that the foregoing is true and correct. Executed on February 20, 2015.

_/s/Andrew P. Bridges_____
Andrew P. Bridges