

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

CAMBRIDGE UNIVERSITY PRESS,  
*et al.*,

Plaintiffs,

Civil Action No. 1:08-CV-1425-ODE

- vs. -

MARK P. BECKER, in his official  
capacity as Georgia State University  
President, *et al.*,

Defendants.

**DEFENDANTS' SECOND SUPPLEMENTAL  
INITIAL DISCLOSURES**

Defendants MARK P. BECKER, in his official capacity as Georgia State University President, et al. (collectively, "Defendants"), pursuant to Local Rule 26.1 and Rule 26 of the Federal Rules of Civil Procedure, and without waiving any claim of attorney-client privilege, work product protection, or trade secret protection, respectfully submit their Second Supplemental Initial Disclosures to Plaintiffs Cambridge University Press, Oxford University Press, Inc., and Sage

Publications, Inc. (“Plaintiffs”). Defendants expressly reserve the right to supplement these disclosures and to introduce additional information in connection with any motion, hearing, or trial as discovery proceeds.

**6) Provide the name of any person who may be used at trial to present evidence under Rules 702, 703, or 705 of the Federal Rules of Evidence. For all experts described in Fed. R. Civ. P. 26(a)(2)(B), provide a separate written report satisfying the provisions of that rule. (Attach expert witness list and written reports to Initial Disclosures as Attachment B.)**

Defendants may use Kenneth D. Crews, J.D., Ph.D. at trial to present evidence under Rules 702, 703, or 705 of the Federal Rules of Evidence. The Rebuttal Expert Report of Kenneth D. Crews is attached as Exhibit A.

Respectfully submitted this 2nd day of November, 2009.

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**CERTIFICATE OF SERVICE AND TYPE**

Pursuant to Local Rule 7.1D, the undersigned counsel for Defendants hereby certifies that the foregoing has been prepared with a font size and point selection (Times New Roman, 14 pt.) which was approved by the Court, and that on this 2nd day of November 2009, the foregoing **Defendants' Second Supplemental Initial Disclosures** was electronically filed with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to the following counsel of record:

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