

# **EXHIBIT 16**

WIAA State Tournaments - Events/Distribution									
Annual Cycle									
Fall	Tournament	Location	Events	FS Wisconsin	Fox College Sports	WIAA TV Live Stream	WIAA TV Archive Stream	DVD	
	GOLF - GIRLS	UW-Ridge CC - Madison	Tournament Highlight Show	1	1	-	1	1	
	TENNIS (INDIVIDUAL) - GIRLS	Nielsen Stadium - Madison	Tournament Highlight Show	1	1	-	1	1	
	TENNIS (TEAM) - GIRLS	Nielsen Stadium - Madison	Tournament Highlight Show	1	1	-	1	1	
	CROSS COUNTRY - BOYS & GIRLS	Ridges CC - Wisconsin Rapids	Tournament Highlight Show	1	1	-	1	1	
	SOCCER - BOYS	Uphelm Soccer Park - Milwaukee	Division 1 Quarterfinals Division 1 Semifinals Division 1 Finals Division 2 Semifinals Division 2 Finals Division 3 Semifinals Division 3 Finals	- - 1 - 1 - 1	- - 1 - 1 - 1	4 2 - 2 - 2 -	4 2 1 2 2 1 2	4 2 1 2 2 1 2	
	SWIMMING & DIVING - GIRLS	UW-Natalieum - Madison	Division 1 Swim/Dive Final Division 1 Dive Prelims/Semis Division 2 Swim/Dive Final Division 2 Dive Prelims/Semis	1 - 1 -	1 - 1 -	- - - -	1 1 1 1	1 1 1 1	
	VOLLEYBALL - GIRLS	Resch Center - Green Bay	Division 1 Quarterfinals Division 1 Semifinals Division 1 Finals Division 2 Semifinals Division 2 Finals Division 3 Semifinals Division 3 Finals Division 4 Semifinals Division 4 Finals	- 1 1 - 1 - 1 1 1	- 1 1 - 1 - 1 1 1	4 2 - 2 - 2 - 2 -	4 2 1 2 2 1 2 1	4 2 1 2 2 1 2 1	
	VOLLEYBALL - BOYS	Wisconsin Lutheran College - Milwaukee	Quarterfinals Semifinals Finals	- - 1	- - 1	4 2 -	4 2 1	4 2 1	
	*FOOTBALL	Camp Randall - Madison	Divisional Finals Tournament Highlight Show(s)	7 7	7 7	- -	7 7	7 7	
			Fall Titles Sub-Total	28	28	28	58	58	

Winter	Tournament	Location	Events	FS Wisconsin	Fox College Sports	WIAA TV Live Stream	WIAA TV Archive Stream	DVD
	SWIMMING & DIVING - BOYS	UW Natatorium - Madison	Division 1 Swim/Dive Final Division 1 Dive Prelims/Semis Division 2 Swim/Dive Final Division 2 Dive Prelims/Semis	1 - 1 -	1 - 1 -	- - - -	1 1 1 1	1 1 1 1
	WRESTLING (INDIVIDUAL)	The Kohl Center - Madison	Division 1 Finals Division 2 Finals Division 3 Finals All Divisions - Non-Final Sessions	1 1 1 -	1 1 1 -	- - - 4	1 1 1 -	1 1 1 -
	WRESTLING (TEAM)	UW Field House - Madison	Division 1 Quarterfinals Division 1 Semifinals Division 1 Finals Division 2 Semifinals Division 2 Finals Division 3 Semifinals Division 3 Finals	- - 1 - 1 - 1	- - 1 - 1 - 1	4 2 2 2 2 2 2	4 2 1 2 2 2 1	4 2 1 2 2 2 1
	*HOCKEY - BOYS	Alliant Energy Center - Madison	Quarterfinals Semifinals Finals	4 2 1	4 2 1	- - -	4 2 1	4 2 1
	*HOCKEY - GIRLS	Alliant Energy Center - Madison	Semifinals Finals	2 1	2 1	- -	2 1	2 1
	GYMNASTICS	Lincoln High School - Wisconsin Rapids	Tournament Highlight Show	1	1	-	1	1
	*BASKETBALL - GIRLS	Alliant Energy Center - Madison	Division 1 Quarterfinals Division 1 Semifinals Division 1 Finals Division 2 Semifinals Division 2 Finals Division 3 Semifinals Division 3 Finals Division 4 Semifinals Division 4 Finals	- - 1 - 1 - 1 - 1	- - 1 - 1 - 1 - 1	- - - - - - - -	4 2 1 2 1 2 1 2	4 2 1 2 1 2 1 2
	*BASKETBALL - BOYS		Division 1 Quarterfinals Division 1 Semifinals Division 1 Finals Division 2 Semifinals Division 2 Finals Division 3 Semifinals Division 3 Finals Division 4 Semifinals Division 4 Finals	- - 1 - 1 - 1 - 1	- - 1 - 1 - 1 - 1	- - - - - - - -	4 2 1 2 1 2 1 2	4 2 1 2 1 2 1 2
			Winter Titles Sub-Total	27	27	14	63	63

Spring/Summer Tournament	Location	Events	FS Wisconsin	Fox College Sports	WIAA-TV Live Stream	WIAA-TV Archive	DVD
TENNIS (INDIVIDUAL) - BOYS	Nielsen Stadium - Madison	Tournament Highlight Show	1	1	-	1	1
TRACK & FIELD - BOYS & GIRLS	Veterans Memorial Stadium - UW-La Crosse	Division 1 Girls Track and Field	1	1	-	1	1
		Division 2 Girls Track and Field	1	1	-	1	1
		Division 3 Girls Track and Field	1	1	-	1	1
		Division 1 Boys Track and Field	1	1	-	1	1
		Division 2 Boys Track and Field	1	1	-	1	1
		Division 3 Boys Track and Field	1	1	-	1	1
GOLF - BOYS	University Ridge - Madison	Tournament Highlight Show	1	1	-	1	1
TENNIS (TEAM) - BOYS	Nielsen Stadium - Madison	Tournament Highlight Show	1	1	-	1	1
SOCCER - GIRLS	Uhlen Soccer Park - Milwaukee	Division 1 Quarterfinals	-	-	4	4	4
		Division 1 Semifinals	-	-	2	2	2
		Division 1 Finals	1	1	-	1	1
		Division 2 Semifinals	-	-	2	2	2
		Division 2 Finals	1	1	-	1	1
		Division 3 Semifinals	-	-	2	2	2
		Division 3 Finals	1	1	-	1	1
SOFTBALL	Goodman Diamond - Madison	Division 1 Quarterfinals	-	-	4	4	4
		Division 1 Semifinals	-	-	2	2	2
		Division 1 Finals	1	1	-	1	1
		Division 2 Semifinals	-	-	2	2	2
		Division 2 Finals	1	1	-	1	1
		Division 3 Semifinals	-	-	2	2	2
		Division 3 Finals	1	1	-	1	1
		Division 4 Semifinals	-	-	2	2	2
		Division 4 Finals	1	1	-	1	1
BASEBALL (SPRING)	Fox Cities Stadium - Grand Chute	Division 1 Quarterfinals	-	-	4	4	4
		Division 1 Semifinals	-	-	2	2	2
		Division 1 Finals	1	1	-	1	1
		Division 2 Semifinals	-	-	2	2	2
		Division 2 Finals	1	1	-	1	1
		Division 3 Semifinals	-	-	2	2	2
		Division 3 Finals	1	1	-	1	1
		Division 4 Semifinals	-	-	2	2	2
		Division 4 Finals	1	1	-	1	1
BASEBALL (SUMMER)	Bykott Park - Stevens Point	Quarterfinals	-	-	4	4	4
		Semifinals	-	-	2	2	2
		Finals	1	1	-	1	1
		Spring/Summer Titles Sub-Total	21	21	40	61	61
		Total Annual Titles	76	76	82	182	182

\*Reflects on-transmission of FS WI and ONT produced events.

# **EXHIBIT 17**

InsideBADGERSPORTS.com is the All-Access portal for the University of Wisconsin Athletics program. We are excited to offer this new media player which will provide fans an upgrade in sports listening and viewing for Badger Athletics.

For one season pass costing \$79.95, or a monthly pass of \$9.95, fans can sign-in to see exclusive video content as well as listen online to their favorite Badger team. Live audio streams will include all home and away football, men's basketball, women's basketball, and men's hockey games, and all the coaches' radio shows with Bret Bielema, Bo Ryan, and Mike Eaves.

The season or monthly pass will also include live video streamed events (as available) and all post game news conferences for football and men's basketball as well as football signing day. The Silverlight player features the latest technology for live and on-demand viewing.

There are also a number of free features available through insideBADGERSPORTS.com including archives of streamed games and regular Monday news conferences featuring coaches in all UW sports.

#### **EXCLUSIVE CONTENT**

- LIVE audio streaming of all football, men's basketball, women's basketball, and men's hockey and coaches shows for football, basketball, men's hockey
- LIVE video streaming of available, women's basketball, volleyball, wrestling, women's hockey and men's hockey games
- Post-game news conferences for home football and men's basketball games
- Behind the scenes access
- Special Football Signing Day coverage

#### **Other Content**

- Weekly press conferences (live and archived)
- Volleyball audio streams (away games only)
- Game highlights and features
- Football daily practice reports (spring camp and preseason)
- Access to hundreds of archived video broadcasts
- Interviews with coaches and players
- Tours of facilities
- Training tips by coaches

# **EXHIBIT 18**

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN

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WISCONSIN INTERSCHOLASTIC ATHLETIC  
ASSOCIATION, AMERICAN-HIFI, INC.,

Plaintiffs,

Case No. 09-CV-155

v.

GANNETT CO., INC. and  
WISCONSIN NEWSPAPER ASSOCIATION, INC.,

Defendants.

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**GANNETT CO., INC.'S RESPONSES TO PLAINTIFF  
WISCONSIN INTERSCHOLASTIC ATHLETIC  
ASSOCIATION'S FIRST SET OF INTERROGATORIES**

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Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, defendant Gannett Co., Inc. ("Gannett") by its attorneys Godfrey & Kahn, S.C., hereby responds to Plaintiff Wisconsin Interscholastic Athletic Association's First Set of Interrogatories to Defendant Gannett Co. as follows:

## GENERAL OBJECTIONS AND CONDITIONS

1. Gannett objects to the Requests to the extent that they seek, or a response would disclose, documents or information protected by the attorney-client privilege, the work product doctrine, trade secret laws, or any other privileges or protections to which Gannett is entitled.

2. Gannett's decision to provide information or documents notwithstanding the objectionable nature of the Interrogatories and Requests should not be construed as:

- (a) A stipulation that the material is relevant;
- (b) A waiver of the General Objections or the objections asserted in response to specific requests; or
- (c) An agreement that requests for similar information will be treated in a similar manner.

3. Gannett objects to the Interrogatories and Requests to the extent that they attempt to require Gannett to produce documents that are not in its possession, custody, or control.

4. Gannett objects to the Interrogatories and Requests to the extent that they are beyond the scope of, or would impose any greater obligation on Gannett than would, the Federal Rules of Civil Procedure or any applicable order in this case.

5. Gannett objects to the Interrogatories and Requests to the extent that they attempt to require Gannett to undertake an unreasonably burdensome investigation or to respond on behalf of persons other than Gannett.

6. Gannett's investigation with respect to the above-captioned matter is ongoing. It therefore reserves its right to amend and/or supplement the responses to the Interrogatories and Requests.

## INTERROGATORIES

**Interrogatory No. 1:** State the complete factual basis for Defendants' allegations made in ¶¶ 39-42 of Defendants' Counterclaims related to the Internet transmission of WIAA-Sponsored Events, and/or the alleged refusal by WIAA or WWY to permit internet transmission of WIAA-sponsored tournament events, including without limitation all persons with knowledge of the events described therein, all persons from the WIAA, WWY, or the relevant host schools contacted by any of those persons during the time in question, and all documents or other evidence Defendants will rely upon in support of these contentions.

**RESPONSE TO INTERROGATORY NO. 1:** Dan Flannery, the executive editor of *The Post-Crescent*, and the following people have knowledge of the Internet streaming of the games referenced in ¶ 39 of the Defendants' Counterclaims, and all contacts concerning the newspaper's intention to stream the referenced games:

<b>GREEN BAY PREBLE v. APPLETON NORTH (OCTOBER 28, 2008)</b>	
Brett Christopherson	Sports Reporter, <i>The Post-Crescent</i>
Kate McGinty	(then) News Reporter, <i>The Post-Crescent</i>
Terry Lipshetz	Digital Operations Editor, <i>The Post-Crescent</i>
Brent Engen	Appleton West High School Coach
Dave Pynenberg	Appleton North High School Athletic Director
<b>NEW LONDON v. WAUPACA (OCTOBER 28, 2008)</b>	
Ricardo Arguello	Sports Reporter, <i>The Post-Crescent</i>
Tim Froberg	Sports Reporter, , <i>The Post-Crescent</i>
Joel Christopher	Digital Content Editor, <i>The Post-Crescent</i>
<b>APPLETON NORTH v. BAY PORT (NOVEMBER 1, 2008)</b>	
Ricardo Arguello	Sports Reporter, <i>The Post-Crescent</i>
Brett Christopherson	Sports Reporter, <i>The Post-Crescent</i>
Joel Christopher	Digital Content Editor, <i>The Post-Crescent</i>

APPLETON NORTH v. STEVENS POINT (NOVEMBER 8, 2008)	
Ricardo Arguello	Sports Reporter, <i>The Post-Crescent</i>
Brett Christopherson	Sports Reporter, <i>The Post-Crescent</i>
Joel Christopher	Digital Content Editor, <i>The Post-Crescent</i>

John Dye, executive editor of the *Green Bay Press-Gazette* has knowledge about contacts with the host schools concerning the *Green Bay Press-Gazette*'s Internet streaming or attempted streaming of football matches identified in ¶¶ 39-40. The athletic director of Stevens Point Area High School has knowledge about the permission that school granted to *The Post Crescent* to stream the November 8, 2008 game referenced in ¶ 39.

Dan Flannery and Brad Zimanek, then-sports editor of *The Post-Crescent*, have information about WWVY's demand for compensation from *The Post-Crescent* for the Internet streaming on the newspaper's website of the November 8, 2008 football game referenced in ¶ 39. Also, John Dye has information about WWVY's demand for compensation from the *Green Bay Press-Gazette* for that newspaper's posting of *The Post-Crescent*'s stream of that same football game on the *Green Bay Press-Gazette*'s website.

John Dye and Jim Matthews, Photo Editor of the *Green Bay Press-Gazette*, have information about the *Green Bay Press-Gazette* being denied permission to stream the February 24, 2009 first round (Division 2) girls basketball game between Southern Door High School and Green Bay Notre Dame (hosted at West De Pere High School).

Dan Flannery and Joel Christopher have knowledge about *The Post-Crescent* being denied permission by West De Pere High School Athletic Director Rick Smith to stream the November 1, 2008 football game referenced in ¶ 40. Dan Flannery and Brad Zimanek have information about being denied permission to stream the November 8, 2008 Kaukauna High School v. Kimberly High School game referenced in ¶ 40.

Stew Rieckman, editor of the *Oshkosh Northwestern*, and Dave Wasinger, Assistant News Editor/Digital at the *Oshkosh Northwestern*, have information about that publication being denied permission to stream the November 1, 2008 Oshkosh North High School v. Kimberly High School football game referenced in ¶ 40.

**Interrogatory No. 2:** State the complete factual basis for Defendants' allegations made in ¶ 45 of Defendants' Counterclaims regarding alleged restrictions WIAA has placed on You, WNA, or any WNA member related to "live blogging," including without limitation all persons with knowledge of the events described therein, the content these individuals sought to "live blog," whether such content was textual or included photographic images, and all documents or other evidence Defendants will reply upon in support of these contentions.

**RESPONSE TO INTERROGATORY NO. 2:** WIAA restricts 'live blogging' by members of the news media, including Gannett newspapers and WNA member newspapers, through its Media Policies Reference Guide requiring "rights" payments for Internet blogging and through WIAA invoicing of "blogging fees." Dan Flannery, Peter Fox and John Dye have indirect information about WIAA's attempts to implement or enforce blogging restrictions and fees for the Internet text-only live reporting of WIAA-Sponsored Events.

Rob Hernandez, Prep Sports Editor at the *Wisconsin State Journal*, Mike Davis, Sports Editor at the *Milwaukee Journal Sentinel*, and Todd C. Clark, Director of Communications for the WIAA, have personal knowledge of the circumstances under which WIAA invoiced those entities because of their text-only Internet transmission of live game reports. Transcripts of those transmissions are being produced in response to WIAA's document requests.

**Interrogatory No. 3:** State the complete factual basis for Defendants' contention that individuals have been deterred from reporting on WIAA-Sponsored Events, whether via text

only Internet transmission (i.e., live blogging) or otherwise, including without limitation identification of all instances in which the WIAA has restricted or deterred an Internet transmission or publication; the complete circumstances surrounding the alleged deterrence or restriction, including the date, location, and persons with knowledge of any such instances; and documents or other evidence Defendants will rely upon to support this assertion.

**RESPONSE TO INTERROGATORY NO. 3:** *See* Response to Interrogatory Nos. 1 and 2. In addition, Peter Fox has information about WNA members who have been deterred by WIAA's threats to withhold credentials to news reporters or who have been deterred by WIAA's Media Guide references to exclusive rights from utilizing Internet streaming to report WIAA-Sponsored Events and from selling photographs taken at those events. It is not possible, however, to detail "the complete circumstances surrounding" each instance of deterrence.

**Interrogatory No. 4:** State the complete factual basis for Defendants' allegation that WIAA has given preferential treatment or preferential access to WIAA-Sponsored Events to any particular news organizations, including without limitation identification of all individuals, testimony, documents, or other evidence Defendants will rely upon to support this assertion.

**RESPONSE TO INTERROGATORY NO. 4:** WIAA grants preferential treatment and access to its contractual partners, including Visual Image Photography, Inc. ("VIP") and American-HiFi, Inc. ("WWY"), by allowing them access to games and the right to use specific reporting methods without the same restrictions imposed on other members of the news media. WWY has been given the "sole discretion," according to the WIAA's Media Guide, to determine "[a]ll permissions granted, policies enforced and fees required" of other news organizations that seek to report WIAA-Sponsored Events by Internet streaming. WIAA also has contracted "to provide preferred credentials *and access* to American-HiFi/When We Were

Young Productions at all WIAA tournament series and championship events and venues.”  
(emphasis added).

Dan Flannery, John Dye and Peter Fox have information on WIAA’s preferential policies, which are evidenced by WIAA’s Media Guide and exclusive rights contracts.

Mark Hertzberg, director of photography at *The Journal Times* in Racine has information about WIAA granting unequal access to VIP photographers at state football tournaments as well as WIAA enforcement of its Media Policies Reference Guide’s state basketball tournament rule that “No television or press photography is allowed on the court during pregame warm-ups, during announcing of string line-ups or anytime during the game with the exception of the official WIAA network and videographers,” a restriction that does not apply to the WIAA’s exclusive partners.

**Interrogatory No. 5:** State the complete factual basis for Defendants’ contention that You or any member of the media has suffered any harm as a result of WIAA policies or practices, including without limitation, a complete description of the alleged harm, identification of the specific entity harmed, and of all individuals, testimony, documents, or other evidence Defendants will rely upon to support this assertion.

**RESPONSE TO INTERROGATORY NO. 5:** Gannett newspapers were harmed by being denied the ability to cover four football matches in 2008 as identified in ¶ 40 of the Defendants’ Counterclaim using their preferred technology. But for this dispute and litigation, moreover, Gannett newspapers would have covered other Tournament events of interest in their respective areas using that technology. All news organizations who would otherwise consider reporting WIAA-Sponsored Events by Internet streaming or selling photographs taken at those events are harmed by the WIAA’s exclusive rights contracts, as are members of the public.

WNA members have been harmed by being invoiced for providing blogging coverage of football tournament events, with the implicit threat that failure to pay might jeopardize their ability to attend and report on future WIAA-Sponsored Events.

**Interrogatory No. 6:** Identify the complete circumstances surrounding any instances Defendants are aware of in which the WIAA has denied You or any other member of the media entry to WIAA-sponsored events, entry to designated media facilities at WIAA-sponsored events, or media credentials that would permit entry to WIAA-Sponsored Events, including without limitation identification of all individuals with knowledge of the alleged denial, all documents or other evidence related thereto, and the specific way in which WIAA denied such entry.

**RESPONSE TO INTERROGATORY NO. 6:** Gannett is not aware of any instance in which WIAA has denied Defendants or other members of the news media entry to a WIAA-Sponsored Event, entry to designated media facilities of WIAA-Sponsored Events, or media credentials permitting entry to a WIAA-Sponsored Event.

Gannett alleges, however, that WIAA uses exclusive rights contracts to unlawfully discriminate against and among news organizations with respect to the content of and their preferred methods for reporting on WIAA-Sponsored Events. *See also* Responses to Interrogatory Nos. 1, 2 and 4.

**Interrogatory No. 7:** Describe in detail the structure and organization of Gannett, including without limitation the structure of directorship, or other leadership institutions or decision-making bodies, the relationship between that leadership and the rest of the organization, the relationship between Gannett and any parents, subsidiaries and affiliates, and all newspapers

or other media organizations in Wisconsin that are owned by, affiliated with, or subsidiaries of Gannett.

**RESPONSE TO INTERROGATORY NO. 7:** Information about Gannett's organization can be found in its Annual Report which is available online at <http://www.gannett.com> in the "Investors Relations" section.

**Interrogatory No. 8:** Identify the complete circumstances surrounding any instances Defendants are aware of in which the WIAA has denied or restricted You or any other member of the media from publishing in any form, whether via the Internet or print, any written account of any WIAA-Sponsored Event, including without limitation identification of all individuals with knowledge of the alleged denial or restriction and all documents or other evidence related thereto.

**RESPONSE TO INTERROGATORY NO. 8:** Gannett is not aware of any instances of pre-publication censorship by WIAA of written accounts of WIAA-Sponsored Events. WIAA has, however, unlawfully invoiced WNA members for their Internet reporting on WIAA-Sponsored Events (*see* Response to Interrogatory Nos. 1 and 2 above) and has asserted in its initial pleading in this action "that it has ownership rights in any...writing, drawing or other depiction or description of any...athletic event that it sponsors...." Similarly, WIAA asserts in the Media Guide that "Any account/transmitting of real-time video, audio, digital images *or data* is prohibited on-site or off-site without consent of WIAA." In the Media Guide, WIAA also asserts the right to permit or deny permission to post web logs based on WIAA's own determination of whether the content consists of "continuous play-by-play accounts of game or event action."

**Interrogatory No. 9:** State whether You contend that the venues or facilities in which WIAA-Sponsored Events are held constitute a public forum, and if so, state the complete factual basis for this contention, including without limitation all persons with knowledge of the facts, and all documents or other evidence Defendants will rely upon in support of this contention.

**RESPONSE TO INTERROGATORY NO. 9:** The facilities in which WIAA-Sponsored Events are held are open generally to members of the public to attend as spectators of the sporting events being conducted there. In addition, those facilities are held open to news organizations as designated or limited public forums for the purpose of reporting on those sporting events, as evidenced by the WIAA's Media Guide. Every reporter who has sought and received credentials to cover WIAA-Sponsored Events, as well as their editors, has knowledge of these facts.

**Interrogatory No. 10:** State whether You contend that WIAA-Sponsored Events are newsworthy events, and if so, state the complete factual basis for this contention, including without limitation all persons with knowledge of the facts, and all documents or other evidence Defendants will rely upon in support of this contention.

**RESPONSE TO INTERROGATORY NO. 10:** Gannett objects to the scope of this interrogatory as being overbroad. Individual sports editors determine what is newsworthy and the extent to which they will devote time and resources to covering an event. That WIAA-Sponsored Events are considered newsworthy by sports editors is evidenced by the content of newspaper, broadcast and Internet sports reports statewide during any such event and by the expanded coverage sports editors have chosen to give these events over the years.

**Interrogatory No. 11:** State whether You contend that WIAA policies limit public access to WIAA-Sponsored Events, and if so, state the complete factual basis for this contention,

including without limitation all persons with knowledge of the facts, and all documents or other evidence Defendants will rely upon in support of this contention.

**RESPONSE TO INTERROGATORY NO. 11:** Gannett objects to this interrogatory on the basis that “public access” is ambiguous. Without waiving the objection, Gannett responds that WIAA policies limit public access to news reports concerning WIAA-Sponsored Events to the extent that WIAA restricts newsgathering activities through exclusive rights contracts. Gannett does not contend that WIAA has unlawfully limited public attendance at WIAA-Sponsored Events.

**Interrogatory No. 12:** State whether You contend that WIAA should treat Internet streaming the same as radio broadcasts of WIAA-Sponsored Events, and if so, state the complete factual basis for this contention, including without limitation all persons with knowledge of the facts, and all documents or other evidence Defendants will rely upon in support of this contention.

**RESPONSE TO INTERROGATORY NO. 12:** Gannett maintains that WIAA should treat Internet streaming the same as it treats radio broadcasts of WIAA-Sponsored Events to the extent that WIAA has no exclusive radio broadcast partner and applies its media policies equally to all broadcasters interested in radio coverage of those events as time, place and manner restrictions.

**Interrogatory No. 13:** State the complete factual basis for the allegations in Paragraph 7 of Your Counterclaim regarding WNA members’ coverage of high school sports, including without limitation all persons with knowledge of the facts, and all documents or other evidence Defendants will rely upon in support of this contention.

**RESPONSE TO INTERROGATORY NO. 13:** Gannett objects to the scope of this interrogatory as being overbroad. Without waiving its objection, news readers statewide know that “WNA members have covered Wisconsin high school sports from their inception,” as alleged. Verification is available in the local newspaper archives of every public library in the state and the Wisconsin State Historical Society. In addition, Peter Fox has knowledge of the history of WNA members’ coverage of Wisconsin high school sports and additional information about WNA members’ more recent coverage of interscholastic high school competitions can be obtained from WNA members’ websites and in print publications available at newsstands throughout Wisconsin.

**Interrogatory No. 14:** State the complete factual basis for the allegations in Paragraph 8 of Your Counterclaim regarding WNA members’ reporting of high school sports over the Internet, including without limitation all persons with knowledge of the facts, and all documents or other evidence Defendants will rely upon in support of this contention.

**RESPONSE TO INTERROGATORY NO. 14:** *See* Response to Interrogatory No. 13.

**Interrogatory No. 15:** State the complete factual basis for the allegations in Paragraph 11 of Your Counterclaim regarding Gannett’s newspapers reporting of high school sports over the Internet, including without limitation all persons with knowledge of the facts, and all documents or other evidence Defendants will rely upon in support of this contention.

**RESPONSE TO INTERROGATORY NO. 15:** Gannett objects to the scope of this interrogatory as being overbroad. Without waiving its objection, information about each Gannett newspaper’s online and print reporting of high school sports can be obtained by reviewing each Gannett newspaper’s Web site and print publications. All of the employees and readers of these newspapers have knowledge of these facts.

**As to Responses:**

Dated: \_\_\_\_\_, 2009.

GANNETT CO., INC.

By: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Subscribed, sworn to and acknowledged  
before me this \_\_\_\_ day of \_\_\_\_\_, 2009.

\_\_\_\_\_  
Notary Public, State of Wisconsin  
My Commission expires: \_\_\_\_\_

**As to Objections:**

Dated: \_\_\_\_\_, 2009.

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Robert J. Dreps  
Monica Santa Maria

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*Attorneys for Defendants, Gannett Co., Inc. and  
Wisconsin Newspaper Association, Inc.*

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**As to Responses:**

Dated: 10/2, 2009.

GANNETT CO., INC.

By:

Barbara J. Callow  
Vice President  
Gannett Co., Inc.

Subscribed, sworn to and acknowledged  
before me this 2<sup>nd</sup> day of Oct., 2009.

Barbara J. Callow  
Notary Public, State of Wisconsin VIRGINIA  
My Commission expires: 09/30/2011



**As to Objections:**

Dated: Oct. 5, 2009.



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Robert J. Dreps  
Monica Santa Maria

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*Attorneys for Defendants, Gannett Co., Inc. and  
Wisconsin Newspaper Association, Inc.*

3946543\_2

# **EXHIBIT 19**

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN

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WISCONSIN INTERSCHOLASTIC ATHLETIC  
ASSOCIATION, AMERICAN-HIFI, INC.,

Plaintiffs,

Case No. 09-CV-155

v.

GANNETT CO., INC. and  
WISCONSIN NEWSPAPER ASSOCIATION, INC.,

Defendants.

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**WISCONSIN NEWSPAPER ASSOCIATION, INC.'S  
RESPONSES TO PLAINTIFF WISCONSIN INTERSCHOLASTIC  
ATHLETIC ASSOCIATION'S FIRST SET OF INTERROGATORIES**

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TO: John S. Skilton  
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Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, defendant

Wisconsin Newspaper Association, Inc. ("WNA") by its attorneys Godfrey & Kahn, S.C., hereby  
responds to Plaintiff Wisconsin Interscholastic Athletic Association's First Set of Interrogatories  
to Defendant Wisconsin Newspaper Association, Inc. as follows: