FILED IN CLERK'S OFFICE

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORGIA

DEC 13 2011

JAMER N. HATTEN, Clerk

In re NCAA Student-Athlete Name and Likeness Licensing Litigation

Civil Action No: 4:09-cv-01967-CW Pending in the United States District Court for the Northern District of California

Misc. No. 11-MI-0129

MOTION TO COMPEL

The Antitrust Plaintiffs, Ed O'Bannon, et al., on behalf of themselves and all others similarly situated, [hereinafter "Movants"] respectfully request that this Court enter an order compelling non-party TURNER BROADCASTING SYSTEM to produce all documents responsive to Plaintiffs' properly served subpoena duces tecum. The grounds for this motion are more fully set forth in Plaintiffs' Memorandum of Law in Support of Motion to Compel Production of Documents by Non-Party, the Turner Broadcasting System, and the Declaration of Daniel Herrera, filed contemporaneously herewith.

WHEREFORE, Movants request that the Court enter an order compelling the Turner Broadcasting System to produce all documents responsive to Plaintiffs' subpoena *duces tecum* within ten (10) days.

Respectfully submitted,

This 13 th day of December 2011

DOFFERMYRE SHIELDS CANFIELD & KNOWLES, LLC

Kenneth S. Canfield Georgia Bar No. 10774 Kimberly J. Johnson Georgia Bar No. 687678 1355 Peachtree Street, N.E. Suite 1600 Atlanta, Georgia 30309-3238 (404) 881-8900

Attorneys for Plaintiffs

Bryan L. Clobes
Ellen Meriwether
Daniel O. Herrera
CAFFERTY FAUCHER LLP
1717 Arch Street
Suite 3610
Philadelphia, PA 19103
Tel: (215) 864-2800
Fax: (215) 864-2810
bclobes@caffertyfaucher.com

Jon T. King HAUSFELD LLP 44 Montgomery Street Suite 3400 San Francisco, CA 94104 Tel: (415) 633-1908 Fax: (415) 358-4980

jking@hausfeldllp.com

Michael D. Hausfeld HAUSFELD LLP 1700 K Street, NW Suite 650 Washington, DC 20006 Tel: (202) 540-7200

Fax: (202) 540-7201 mhausfeld@hausfeldllp.com

CERTIFICATE OF SERVICE

I hereby certify that on December 13, 2011, I caused a true and correct copy of the Motion to Compel Production of Documents by Non-Party, Turner Broadcasting System, Plaintiffs' Supporting Memorandum of Law and the Declaration of Daniel Herrera to be served on Counsel for non-party Turner Broadcasting System, by First Class U.S. Mail and electronic mail at the following address:

James A. Lamberth
TROUTMAN SANDERS LLP
Suite 5200, Bank of America Plaza
600 Peachtree Street, N.E.
Atlanta, GA 30308-2216
James.lamberth@troutmansanders.com
Counsel to Turner Broadcasting System.

An Attorney for Plaintiffs