

1 GLENN D. POMERANTZ (State Bar No. 112503)
glenn.pomerantz@mto.com
2 KELLY M. KLAUS (State Bar No. 161091)
kelly.klaus@mto.com
3 CAROLYN HOECKER LUEDTKE (State Bar No. 207976)
carolyn.luedtke@mto.com
4 ROHIT K. SINGLA (State Bar No. 213057)
rohit.singla@mto.com
5 MUNGER, TOLLES & OLSON LLP
560 Mission Street
6 Twenty-Seventh Floor
San Francisco, California 94105-2907
7 Telephone: (415) 512-4000
Facsimile: (415) 512-4077
8

GREGORY L. CURTNER (*Pro Hac Vice*)
gcurtner@schiffhardin.com
9 ROBERT J. WIERENGA (State Bar No. 183687)
rwierenga@schiffhardin.com
10 KIMBERLY K. KEFALAS (*Pro Hac Vice*)
kkefalas@schiffhardin.com
11 SCHIFF HARDIN LLP
12 350 Main St., Suite 210
Ann Arbor, MI 48104
13 Telephone: (734) 222-1500
Facsimile: (734) 222-1501
14

Attorneys for Defendant
15 National Collegiate Athletic Association
16

17 UNITED STATES DISTRICT COURT
18 NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION
19

20 EDWARD O'BANNON, *et al.*,

21 Plaintiffs,
22
23 v.

24 NATIONAL COLLEGIATE ATHLETIC
ASSOCIATION; COLLEGIATE
25 LICENSING COMPANY; and
ELECTRONIC ARTS INC.,

26 Defendants.
27
28

Case No. 09-CV-1967-CW

**[PROPOSED] ORDER GRANTING
DEFENDANT NCAA'S
ADMINISTRATIVE MOTION TO SEAL
CONFIDENTIAL TRIAL EXHIBITS**

Judge: Hon. Claudia Wilken
Courtroom: 2, 4th Floor

09-CV-1967-CW

[PROPOSED] ORDER GRANTING DEFENDANT NCAA'S ADMINISTRATIVE MOTION TO SEAL
CONFIDENTIAL TRIAL EXHIBIT

1
2 Having considered Defendant NCAA's Administrative Motion to Seal Confidential Trial
3 Exhibits ("Motion to File under Seal") and all papers filed in support thereof and determining that
4 the protection of trade secrets and highly confidential business information are compelling
5 reasons,

6 IT IS HEREBY ORDERED that the Motion to Seal is GRANTED in full. If any party
7 seeks to admit into evidence any portion of the following trial exhibits beyond the portions already
8 publicly filed, the exhibit shall be sealed, and testimony regarding the exhibit shall be presented in
9 a manner that avoids public disclosure of confidential material:

- 10 a. Ex. 400, 2010 Multi-Media Agreement between Turner Broadcasting
11 Seystem, Inc., CBS Broadcasting Inc., and the NCAA.
12 b. Ex. 2218, 2010 Digital Rights Agreement between the NCAA and Turner
13 Sports Interactive, Inc.
14

15 IT IS SO ORDERED.
16
17

18 DATED: _____

19 HON. CLAUDIA WILKEN
United States District Judge
20
21
22
23
24
25
26
27
28