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 15 (Additional Counsel Listed on Last Page)

16 UNITED STATES DISTRICT COURT
 17 NORTHERN DISTRICT OF CALIFORNIA
 18 OAKLAND DIVISION

19 EDWARD O'BANNON, et al.,

20 Plaintiff,

21 v.

22 NATIONAL COLLEGIATE ATHLETIC
 ASSOCIATION; COLLEGIATE LICENSING
 23 COMPANY; and ELECTRONIC ARTS,

24 Defendants.

Case No. 4:09-CV-3329-CW

**STIPULATION AND [PROPOSED]
 ORDER REGARDING PLAINTIFFS'
 TRIAL EXHIBIT 400**

Judge: Hon. Claudia Wilken
 Courtroom: 2, 4th Floor
 Trial: June 9, 2014

25
 26 WHEREAS, the Antitrust Plaintiffs proposed to put into evidence a "Multi-Media
 27 Agreement" between Turner Broadcasting System, Inc. ("Turner" or "TBS"), CBS Broadcasting
 28

1 Inc. (“CBS”) and the National Collegiate Athletic Association (“NCAA”), dated April 22, 2010
2 (“Trial Exhibit 400”);

3 WHEREAS, on June 10, 2014 Defendant NCAA submitted an Administrative Motion to
4 Seal Confidential Trial Exhibit 400, and Non-Parties TBS and CBS submitted briefs and
5 declarations in support of Defendant NCAA’s Motion (Dkt. 200, 203);

6 WHEREAS, on June 11, 2014, Non-Party CBS moved to intervene in this matter for the
7 limited purpose of protecting the public disclosure of Trial Exhibit 400 (Dkt. 204);

8 WHEREAS, on June 12, 2014, the Antitrust Plaintiffs, Defendant NCAA, and Non-Parties
9 TBS and CBS reached an agreement to resolve their dispute regarding disclosure and use of Trial
10 Exhibit 400 at trial;

11 **IT IS HEREBY STIPULATED AND AGREED THAT:**

12 1. Sections 2.1 through 2.5 of the Multi-Media Agreement/Trial Exhibit 400 may be
13 shown to a witness and examined upon in court without closing the courtroom, but will not be
14 displayed on any screen in the courtroom visible to members of the public. Likewise, these
15 provisions may not be read aloud and quoted from in the courtroom.

16 2. Exhibit B of the Multi-Media Agreement/Trial Exhibit 400 will remain redacted
17 from any version used in connection with the case.

18 3. Sections 1(g), 1(h), 2.6-2.10, 2.12, 3, 4, 6-8, 9.5, 10-11, 13-16, 19-21, Exs. A, C-J
19 of the Multi-Media Agreement/Trial Exhibit 400 will remain redacted from any version used in
20 connection with the case, other than to the extent any such section, subsection or exhibit has
21 previously been made public by the Court.

22 4. In the event the redacted Multi-Media Agreement/Trial Exhibit 400 is filed in
23 connection with any pleading, motion or other filing either at trial or thereafter, Sections 2.1
24 through 2.5 will be filed only under seal.

25 5. Upon full execution of this Stipulation and Proposed Order, Non-Party CBS will
26 withdraw its motion intervene for the limited purpose of protecting the public disclosure of Trial
27 Exhibit 400 (Dkt. 204).

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Respectfully submitted,

HAUSFELD LLP

Dated: June 12, 2014

By: /s/ Swathi Bojedla
SWATHI BOJEDLA
Plaintiffs' Class Counsel

MUNGER, TOLLES & OLSON LLP

Dated: June 12, 2014

By: /s/ Thane Rehn
THANE REHN
Attorneys for Defendant NCAA

WEIL, GOTSHAL & MANGES LLP

Dated: June 12, 2014

By: /s/ Christopher Cox
CHRISTOPHER COX
Attorneys for Non-Party CBS Broadcasting Inc.

TROUTMAN SANDERS LLP

Dated: June 12, 2014

By: /s/ James Lamberth
JAMES LAMBERTH
Attorneys for Non-Party Turner Broadcasting System, Inc.

[PROPOSED] ORDER

Pursuant to the stipulation of counsel, IT IS SO ORDERED.

Dated: _____

THE HONORABLE CLAUDIA WILKEN
CHIEF UNITED STATES DISTRICT JUDGE

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*Attorneys for Non-Party
Turner Broadcasting System, Inc.*

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CERTIFICATE OF SERVICE

I hereby certify that on June 12, 2014, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification to the e-mail addresses registered.

/s/ Swathi Bojedla
Swathi Bojedla
Plaintiffs' Class Counsel
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