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March 4, 2011

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Re: Unsealing of Exhibits and Testimony in White v. NFL, et al.

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Dear Counsel:

Now that the Court has issued its preliminary ruling, I thought I would inquire about the progress you are making in reviewing exhibits and testimony in this matter for the purpose of redacting and unsealing relevant court documents. I understood from the comments of Judge Doty during the hearing that he expected the parties to continue their work redacting arguably confidential information from relevant documents so that they may ultimately be unsealed.

For my part, I am identifying those classes of documents which I believe satisfy the legal standards with respect to their public nature. I thought it would be beneficial to communicate my thoughts to you, so that you might be able to target documents you should review in the order of their priority.

1. Exhibits and testimony referenced in Judge Doty's Order of March 1, 2011. Any document and prior testimony referred to by the Judge is the type of judicial document that must be unsealed. The reasoning of the Court is reflected in the exhibits and testimony he cites as well as in the words he writes. Both the exhibits and testimony cited in the opinion appear to be NFL documents or testimony by NFL witnesses or about NFL actions. Any confidential information concerning specific financial data of third parties can be excised by a scalpel and not an ax.

2. Exhibits and testimony referenced in the parties' memoranda and supporting papers. The parties submitted to the Court their choice of those exhibits and testimony which they believed advanced their arguments. Once they highlighted the importance of this information, the information became relevant to the process by which Judge Doty came to his conclusions. Again, the legitimate interests of third parties can be protected without the need to seal the documents and testimony of which they are a part.

3. Exhibits and testimony referenced in the opinion of Special Master Burbank. Those arguments which support the unsealing of the exhibits and testimony referred to by Judge Doty apply as well to the evidence cited by the Special Master.

4. The recorded testimony of key witnesses. Based on Judge Doty's Order, the testimony, I assume sworn, of the following witnesses played a pivotal role in his decision: Messrs. Goodell, Siclare and Rolapp. In addition, based on our review of the Special Master's Opinion and the filings by the parties, my clients believe the public should also be able to have timely access to the testimony of Steve Bornstein, expert

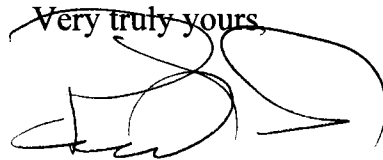
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witness Neal Pilson and Cowboys owner Jerry Jones. I believe justice and the public would be served by the unsealing of their testimony with redactions of specific information relating to third parties which deserve protection.

By identifying these precise requests, I do not mean to suggest that other information need not be reviewed. I thought that these specific materials and testimony were both important to an understanding of the case and judge Doty's Opinion that there would be no serious argument against their unsealing. My clients and I will continue to review the material we have and will advise you when we have concluded that other matters should be unsealed.

I would appreciate it if you would provide me with a timeline which lets me know when we can expect these exhibits and testimony to be unsealed. Of course, I am available to discuss these matters at any time at your convenience.

Very truly yours,


Paul R. Hannah

PRH:ww