

COVINGTON & BURLING LLP

1201 PENNSYLVANIA AVENUE NW
WASHINGTON, DC 20004-2401
TEL 202.662.6000
FAX 202.662.6291
WWW.COV.COM

BEIJING
BRUSSELS
LONDON
NEW YORK
SAN DIEGO
SAN FRANCISCO
SILICON VALLEY
WASHINGTON

BENJAMIN C. BLOCK
TEL 202.662.5205
FAX 202.778.5205
BBLOCK@COV.COM

March 4, 2011

BY EMAIL

Paul R. Hannah, Esq.
Kelly and Hannah, P.A.
3720 IDS Center
80 South Eighth Street
Minneapolis, MN 55402

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

Dear Mr. Hannah:

I am in receipt of a copy of your letter dated March 4th. Please direct any future correspondence on this issue to my attention.

We do not share your understanding of the Court's intention regarding any further requests to unseal materials. The Court was clear that the onus was on you and your clients to "try to focus on what it is that [you] are looking for" and that you and your clients had to "be a little more pointed than just saying [that you want] everything." (2/24/11 Hrg. Tr. at 25, 26.) Your letter is the first we have heard from you since the hearing and the filing of redacted versions of the parties' briefs and the Special Master's opinion pursuant to the Court's written order.

With respect to the specific requests in your letter: The fact that the Court cited or referenced an exhibit or page of an exhibit in his Opinion is not grounds for unsealing of the entirety of the exhibit. Similarly, the fact that the Court cited or referenced a finding of fact that the Special Master made is not ground for unsealing that portion of the Special Master's Opinion or the underlying documents. Indeed, the Court agreed that the redacted version of the Special Master's Opinion properly balanced your request for information with the legitimate interests of the NFL and of third parties in maintaining confidentiality over commercially sensitive information. (See 2/24/11 Hrg. Tr. at 23 ("The Court has conducted an in camera review of all the documents subject to the newspapers' motion and has determined that they do contain confidential information, confidential commercial information, which if unsealed without redaction would cause harm.")).

Paul R. Hannah, Esq.

March 4, 2011

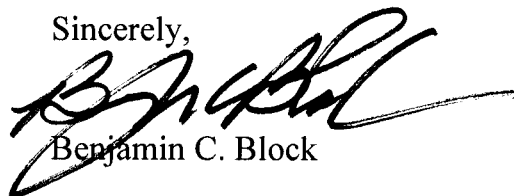
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That said, we will prepare redacted versions of the following exhibits cited in the Court's opinion: 77, 98, 102, 110, 131, 142, 160, 163, 167, 170, 201, 216, 221, 228, as well as redacted versions of the Direct testimony of Commissioner Goodell, Brian Rolapp, and Joseph Siclare (also cited in the Opinion). We will also prepare redacted versions of the following transcript pages cited by the Court: 302-03, 771, 889-92, and 1038. We will also provide a redacted version of the page of Mr. Bornstein's deposition referenced in the Court's opinion. And we will ask the third-parties, if they are amenable to doing so, to prepare redacted versions of the transcript pages 379, 381, 410, 1339, and 1346, also cited in the Opinion, that refer to testimony from third-party witnesses.

As you might expect, the resources of the parties are focused right now on reaching a collective bargaining agreement, but we will endeavor to make these redactions within the next ten business days.

As for your requests for testimony from Mr. Pilson and Mr. Jones: Mr. Pilson's written direct testimony is replete with references to confidential information, and was not cited by the Court in its Opinion. Accordingly, we do not understand the basis for the request to unseal it. Mr. Jones did not testify in this proceeding.

Sincerely,

A handwritten signature in black ink, appearing to read "B. Block", with a long horizontal flourish extending to the right.

Benjamin C. Block

cc: Mr. Kessler
Mr. Heiden
Mr. Barrett
Mr. Connolly
Mr. Thornton
Mr. Jacobson