

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

Reggie White, et al.,

Case No. 92-906 (DSD/SPMS)

Plaintiffs,

**MEMORANDUM OF LAW IN SUPPORT
OF MOTION TO UNSEAL RECORD
BROUGHT BY CLASS COUNSEL AND
THE NFLPA**

v.

National Football League, et al.

Defendants.

The question of public access to court files has again been placed before the Court. Intervenor the St. Paul Pioneer Press (“Pioneer Press”) and the Star Tribune (“Star Tribune”) wish to support the motion brought by Class Counsel and the NFLPA seeking an order unsealing the entire record, excluding confidential materials belonging to third parties.

The Pioneer Press and Star Tribune believe that the authorities they cited and arguments they made in their original filings with the Court support the present motion. While the Pioneer Press and Star Tribune will continue to press the NFL for its position with respect to access to specific categories of documents, they fear that the procedure outlined by NFL counsel in their March 4, 2011 letter to counsel for the newspapers will result in large scale redactions which will frustrate the public’s right to be informed of the basis for the important questions now being addressed by the Court.

CONCLUSION

The record of the Broadcast Revenues Proceedings should be unsealed and made available to the public, with adequate protection for confidential information of third parties. The NFL and its member football clubs have taken advantage of billions of dollars of public revenue to build their business. This is not a private dispute between private entities. The record presented to this Court for use in its decision-making process is a public matter, not a private matter.

Dated: March 11, 2011

KELLY AND HANNAH, P.A.

s/Paul R. Hannah
Paul R. Hannah (#40502)
3720 IDS Center
80 South Eighth Street
Minneapolis, MN 55402
(612) 349-6171

Attorneys for Intervenor