



IN THE COURT OF COMMON PLEAS OF CENTRE COUNTY, PENNSYLVANIA
CIVIL ACTION – LAW

ESTATE of JOSEPH PATERNO;
AL CLEMENS, member of the Board of Trustees of
Pennsylvania State University;

and

WILLIAM KENNEY and JOSEPH V. ("JAY")
PATERNO,
former football coaches at Pennsylvania State
University

Plaintiffs,

v.

NATIONAL COLLEGIATE ATHLETIC
ASSOCIATION
("NCAA"),
MARK EMMERT, individually and as President of the
NCAA, and
EDWARD RAY, individually and as former Chairman
of
the Executive committee of the NCAA,

Defendants,

and

THE PENNSYLVANIA STATE UNIVERSITY,

Nominal Defendant.

) **Docket No.:** 2013-2082

) **Type of Case:**

) Declaratory Judgment Injunction

) Breach of Contract

) Tortious Interference with

) Contract

) Defamation

) Commercial Disparagement

) Conspiracy

) **Type of Pleading:**

) Certificate Prerequisite to

) Service of a Subpoena Upon

) James T. Clemente, Pursuant to

) Rule 4009.22 with Notice of

) Intent to Serve a Subpoena to

) James T. Clemente to Produce

) Documents and Things for

) Discovery Pursuant to Rule

) 4009.21

) **Filed on Behalf of:**

) National Collegiate Athletic

) Association, Mark Emmert,

) Edward Ray

) **Counsel of Record for this**

) **Party:**

) Thomas W. Scott, Esquire

) Killian & Gephart, LLP

) 218 Pine Street

) P.O. Box 886

Harrisburg, PA 17108-0886

TEL: (717) 232-1851

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tscott@killiangephart.com

PA I.D. Number: 15681

IN THE COURT OF COMMON PLEAS OF CENTRE COUNTY, PENNSYLVANIA

ESTATE of JOSEPH PATERNO;
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and

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Defendants,

and

THE PENNSYLVANIA STATE UNIVERSITY,

Nominal Defendant.

Civil Division

Docket No.: 2013-2082

FILED
2015 MAY 13 PM 3:37
PROCLAMATORY
CENTRE COUNTY, PA

**CERTIFICATE PREREQUISITE TO SERVICE OF A SUBPOENA
UPON JAMES T. CLEMENTE, PURSUANT TO RULE 4009.22**

As a prerequisite to service of a subpoena for documents and things upon

James T. Clemente, pursuant to Rule 4009.22, Defendants certify that:

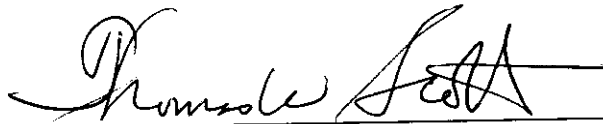
(1) a notice of intent to serve the subpoena with a copy of the subpoena attached thereto was mailed or delivered to each party at least twenty days prior to the date on which the subpoena is sought to be served,

(2) a copy of the notice of intent, including the proposed subpoena, is attached to this certificate,

(3) no objection to the subpoena has been received, and

(4) the subpoena which will be served is identical to the subpoena which is attached to the notice of intent to serve the subpoena.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Thomas W. Scott", is written over a horizontal line.

Thomas W. Scott, Esquire
Attorney I.D. #15681
KILLIAN & GEPHART, LLP
218 Pine Street
P.O. Box 886
Harrisburg, PA 17108-0886

Date: May 13, 2015

Attorneys for Defendants

IN THE COURT OF COMMON PLEAS OF CENTRE COUNTY, PENNSYLVANIA

GEORGE SCOTT PATERNO, as duly appointed representative
of the ESTATE and FAMILY of JOSEPH PATERNO;

AL CLEMENS, member of the Board of Trustees of
Pennsylvania State University; and

WILLIAM KENNEY and JOSEPH V. ("JAY") PATERNO,
former football coaches at Pennsylvania State University,

Plaintiffs,

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NATIONAL COLLEGIATE ATHLETIC ASSOCIATION
("NCAA"), MARK EMMERT, individually and as President of
the NCAA, and EDWARD RAY, individually and as former
Chairman of the Executive Committee of the NCAA,

Defendants,

and

THE PENNSYLVANIA STATE UNIVERSITY,

Defendant.

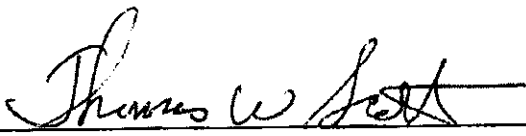
Civil Division

Docket No. 2013-
2082

**THE NATIONAL COLLEGIATE ATHLETIC ASSOCIATION'S NOTICE OF INTENT
TO SERVE A SUBPOENA TO JAMES T. CLEMENTE TO PRODUCE DOCUMENTS
AND THINGS FOR DISCOVERY PURSUANT TO RULE 4009.21**

The National Collegiate Athletic Association intends to serve a subpoena identical to the one that is attached to this notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the subpoena. If no objection is made, the subpoena may be served.

Date: April 22, 2015


Thomas W. Scott (No. 15681)
KILLIAN & GEPHART, LLP
218 Pine Street
P.O. Box 886
Harrisburg, PA 17108-0886

Telephone: (717) 232-1851
Email: tscott@killiangephart.com

Everett C. Johnson, Jr. (admitted *Pro Hac Vice*,
DC No. 358446)

Brian E. Kowalski (admitted *Pro Hac Vice*, DC
No. 500064)

Sarah M. Gragert (admitted *Pro Hac Vice*, DC
No. 977097)

LATHAM & WATKINS LLP

555 Eleventh Street NW

Suite 1000

Washington, DC 20004-1304

Telephone: (202) 637-2200

Email: Everett.Johnson@lw.com

Brian.Kowalski@lw.com

Sarah.Gragert@lw.com

*Counsel for Defendants the NCAA, Dr. Emmert,
and Dr. Ray*

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CENTRE

GEORGE SCOTT PATERNO ET AL.

VS

NATIONAL COLLEGIATE ATHLETIC ASSOCIATION ET AL.

File No. 2013-2082

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS
FOR DISCOVERY PURSUANT TO RULE 4009.22

TO: JAMES T. CLEMENTE

(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the court to produce the following documents or things: See Exhibit A, attached.

at Killian & Gephart, LLP, 218 Pine St., PO Box 886, Harrisburg, PA 17108-0886

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Thomas W. Scott

ADDRESS: 218 Pine St., PO Box 886
Harrisburg, PA 17108-0886

TELEPHONE: (717) 232-1851

SUPREME COURT ID # 15681

ATTORNEY FOR: National Collegiate Athletic Association

DATE: _____
Seal of the Court

EXHIBIT A

DEFINITIONS

1. "You," "your," and "yours" shall refer to James T. Clemente, and all other persons acting on behalf of James T. Clemente, including but not limited to, attorneys and their associates, investigators, agents, directors, officers, employees, representatives, and others who may have obtained information for or on behalf of James T. Clemente.
2. "Plaintiffs" shall mean each of the individuals identified in the caption above, any representative of those individuals, and any representatives of the Estate and Family of Joseph Paterno.
3. "All" or "any" shall mean "each and every."
4. "And" and "or" shall mean either disjunctively or conjunctively as necessary to bring within the scope of discovery request all responses that might otherwise be construed outside of its scope.
5. "Document" or "documents" is defined as broadly as possible, and is defined to include originals and copies (including all non-identical copies or photocopies) as well as all draft and final versions of, without limitation: (a) All writings of any kind (including the originals and all non-identical copies, whether different from the originals by reason of any notation made on such copies or otherwise), including, without limitation, correspondence, notes, statements, transcripts, books, diaries, intra-office communications, notations of any sort of conversations or interviews; (b) All graphic representations of any kind, including, without limitation, photographs, charts, graphs, plans, drawings, videos, and recordings; and (c) All electronically generated and/or stored correspondence, memoranda, communications, data compilations, or records of any sort.

6. "Communication(s)" means any act, action, oral speech, written correspondence, contact, expression of words, thoughts, ideas or transmission or exchange of data or other information to another person, whether orally, person-to-person, in a group, by telephone, letter, personal delivery, telex, facsimile, or any other process, electric, electronic or otherwise.
7. "Concerning" shall mean, without limitation, comprising, containing, embodying, referring to, relating to, regarding, alluding to, responding to, in connection with, commenting on, in response to, about, announcing, explaining, discussing, showing, describing, studying, supporting, reflecting, analyzing, or constituting.
8. "Person" shall mean any natural person or any business, legal or governmental entity, or association.
9. The "Paterno Family" shall refer to the family of Joseph Paterno, the decedent represented in this Action by George Scott Paterno, including but not limited to George Scott Paterno and Joseph V. ("Jay") Paterno, Jr.
10. "FSS" shall mean the firm of Freeh, Sporkin & Sullivan LLP.
11. The "Freeh Report" shall mean the July 12, 2012 Report of the Special Investigative Counsel Regarding the Actions of The Pennsylvania State University Related to the Child Sexual Abuse Committed by Gerald A. Sandusky, prepared by FSS.
12. The "Consent Decree" shall mean the July 23, 2012 Binding Consent Decree Imposed by the National Collegiate Athletic Association and Accepted by The Pennsylvania State University.
13. The "February 2013 Analysis" shall mean Your February 2013 *Analysis of the Special Investigative Counsel Report and the Crimes of Gerald A. Sandusky & Education Guide to the Identification and Prevention of Child Sexual Victimization*.

INSTRUCTIONS

1. In accordance with the California Rules of Civil Procedure, in producing the requested Documents, furnish all Documents in Your actual or constructive possession, custody, or control including, without limitation, those Documents in the custody of any advisors, attorneys, investigators, agents, associates, representatives, and other person(s) or entities acting or purporting to act on Your behalf.
2. Documents shall be produced in the manner in which they are maintained in the ordinary course of business or shall be organized and labeled with a designation of the request for production to which they respond and produced along with any file folders or other bindings in which such Documents were found.
3. These Requests shall be deemed to be continuing in nature. If at any time additional responsive Documents come into Your possession, custody or control, then the responses to these Requests shall be promptly supplemented.
4. Any Document or portion of any Document withheld from production based on a claim of privilege shall be identified by (1) the type of Document, (2) the general subject matter of the Document, (3) the date of the Document, and (4) such other information as is sufficient to identify the Document including the author of the Document, the addressee(s) and any copyee(s) or other recipients of the Document, and, where not apparent, the relationship of the author and addressee(s) and copyee(s) to each other. The nature of each claim of privilege shall be set forth.
 - a. Notwithstanding the assertion of any objection, any requested Document that contains non-objectionable information responsive to this Request should be produced, but that portion of the Document for which the objection is asserted may be redacted, provided that the redacted portion is identified and described

consistently according to the requirements listed herein.

5. Except as otherwise noted, this Request seeks the production of Documents created, used, sent or received during the period from **January 1, 2011** through present.
6. Any request for "Communications" shall be construed to include written or tangible Communications, as well as Documents referencing or reflecting oral or person-to-person Communications.
7. The fact that another witness or that a party produces a Document or the availability or production of similar or identical Documents from another source does not relieve You of Your obligation to produce Your copy of the same Document, even if the two Documents are identical.
8. Any Document that cannot be produced in full shall be produced to the fullest extent possible.
9. Each paragraph, subparagraph, clause and word herein should be construed independently and not by reference to any other paragraph, subparagraph, clause or word herein for purposes of limitation.
10. Except as specifically provided herein, words imparting the singular shall include the plural and vice versa, where appropriate.

REQUESTS FOR PRODUCTION

REQUEST NO. 1:

All Communications Concerning the Freeh Report.

REQUEST NO. 2:

All Documents Concerning, and Communications with, Louis Freeh, FSS, Pepper Hamilton LLP, or FSS' current or former principals, representatives and/or employees.

REQUEST NO. 3:

All Documents Concerning the February 2013 Analysis.

REQUEST NO. 4:

All drafts of the February 2013 Analysis, including electronic versions of such drafts maintained on any computer.

REQUEST NO. 5:

All Documents contained in Your client file for Your work Concerning the February 2013 Analysis.

REQUEST NO. 6:

All documents used in the course of Your work on the February 2013 Analysis, including, without limitation, all correspondence, agreements, exhibits, physical evidence, and expert reports.

REQUEST NO. 7:

All Documents Concerning preparation of the February 2013 Analysis including, without limitation, comments to, revisions of, outlines for, research for, and/or possible content of the February 2013 Analysis.

REQUEST NO. 8:

All Documents relied upon in drafting the February 2013 Analysis.

REQUEST NO. 9:

All Documents and Communications Concerning questions, concerns, or criticism of any aspect of the February 2013 Analysis, including the conclusions contained therein.

REQUEST NO. 10:

All Documents Concerning any compensation or benefits, financial or otherwise, you were offered and/or received from the Paterno Family and/or any of its agents from January 1,

2005 to present.

REQUEST NO. 11:

All invoices You submitted for Your work Concerning the February 2013 Analysis, including all backup and supporting documentation.

REQUEST NO. 12:

All Communications, and Documents Concerning Your Communications, with Dr. Graham Spanier, Gary C. Schultz, Timothy M. Curley, and Joseph Paterno, including but not limited to Communications with counsel for any of the aforementioned persons.

REQUEST NO. 13:

All Communications, and Documents Concerning Communications, involving You and any member of the Paterno Family, including but not limited to the Plaintiffs in this action.

REQUEST NO. 14:

All Documents Concerning Communications involving You and Fred S. Berlin, regarding the Paterno Family or any of its members, the Freeh Report and/or the February 2013 Analysis.

REQUEST NO. 15:

All Documents Concerning Communications involving You and K&L Gates LLP, including but not limited to current or former principals, representatives and/or employees of K&L Gates LLP, regarding the Paterno Family or any of its members, the Freeh Report and/or the February 2013 Analysis.

REQUEST NO. 16:

All Documents Concerning Communications involving You and King & Spalding LLP, including but not limited to current or former principals, representatives and/or employees of King & Spalding LLP, regarding the Paterno Family or any of its members, the Freeh Report

and/or the February 2013 Analysis.

REQUEST NO. 17:

Any engagement letter, or reasonably equivalent contract, agreement, or other Document containing the terms by which You would prepare the February 2013 Analysis.

Is (check one):

Applicant (name): ☐ Plaintiff ☐ Petitioner ☒ Defendant ☐ Respondent ☐ Other (specify):
In the above action.

2. Applicant requests that this court issue a subpoena for discovery under Code of Civil Procedure sections 2029.100 – 2029.600 to (name and address of deponent or person in control of property):

James T. Clemente, 4730 Brynhurst Avenue, Los Angeles, CA 90043

3. Attached is (check one): ☐ the original ☐ a true and correct copy of the document from the court in which the action is pending that requires the person in 2 to (check all that apply):

- a. ☐ attend and give testimony at a deposition;
- b. ☒ produce and permit inspection and copying of designated materials, information, or tangible things in the possession, custody, or control of the deponent;
- c. ☐ permit the inspection of premises under the control of the deponent.

4. Applicant submits with this application a proposed subpoena that includes terms identical to those in the document from the out-of-state court. (Code of Civil Procedure section 2029.300(d).)

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date:

Thomas W. Scott

(TYPE OR PRINT NAME)

SIGNATURE OF ATTORNEY OR PARTY WITHOUT ATTORNEY

Note: This application must be accompanied by the fee specified in Government Code section 70628. A discovery subpoena must be personally served on the deponent in compliance with California law, including Code of Civil Procedure section 1985.

**APPLICATION FOR DISCOVERY SUBPOENA
IN ACTION PENDING OUTSIDE CALIFORNIA**

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Thomas W. Scott (PA No. 15681) Killian & Gephart, LLP P.O. Box 886, Harrisburg, PA 17106-0886 TELEPHONE NO.: (717) 232-1831 FAX NO.: E-MAIL ADDRESS: tscott@killiangephart.com ATTORNEY FOR (Name): Defendant National Collegiate Athletic Association	FOR COURT USE ONLY
Court for county in which discovery is to be conducted: SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles STREET ADDRESS: MAILING ADDRESS: CITY, STATE, AND ZIP CODE: BRANCH NAME:	
Court in which action is pending: Name of Court: Court of Common Pleas of Centre County, Pennsylvania STREET ADDRESS: 102 South Allegheny Street MAILING ADDRESS: CITY, STATE, AND ZIP CODE: Bellefonte, PA 16823 COUNTRY: USA	
PLAINTIFF/PETITIONER: GEORGE SCOTT PATERNO, as duly appointed representative of the ESTATE and FAMILY of JOSEPH PATERNO, et al. DEFENDANT/RESPONDENT: NATIONAL COLLEGIATE ATHLETIC ASSOCIATION, et al.	CALIFORNIA CASE NUMBER (if any assigned by court):
SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS IN ACTION PENDING OUTSIDE CALIFORNIA	CASE NUMBER (if action pending outside California): 2013-2082

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name, address, and telephone number of deponent, if known):

James T. Clemente, 4730 Brynhurst Avenue, Los Angeles, CA 90043

1. YOU ARE ORDERED TO PRODUCE THE BUSINESS RECORDS described in Item 3, as follows:

To (name of deposition officer): Thomas W. Scott On (date): Location (address): Killian & Gephart LLP, 218 Pine Street, Harrisburg, PA 17101	At (time):
Do not release the requested records to the deposition officer prior to the date and time stated above.	

- a. ☒ by delivering a true, legible, and durable copy of the business records described in Item 3, enclosed in a sealed inner wrapper with the title and number of the action, name of witness, and date of subpoena clearly written on it. The inner wrapper shall then be enclosed in an outer envelope or wrapper, sealed, and mailed to the deposition officer at the address in item 1.
- b. ☐ by delivering a true, legible, and durable copy of the business records described in item 3 to the deposition officer at the witness's address, on receipt of payment in cash or by check of the reasonable costs of preparing the copy, as determined under Evidence Code section 1563(b).
- c. ☐ by making the original business records described in item 3 available for inspection at your business address by the attorney's representative and permitting copying at your business address under reasonable conditions during normal business hours.
2. The records are to be produced by the date and time shown in item 1 (but not sooner than 20 days after the issuance of the deposition subpoena, or 15 days after service, whichever date is later). Reasonable costs of locating records, making them available or copying them, and postage, if any, are recoverable as set forth in Evidence Code section 1563(b). The records must be accompanied by an affidavit of the custodian or other qualified witness pursuant to Evidence Code section 1561.
3. The records to be produced are described as follows (if electronically stored information is demanded, the form or forms in which each type of information is to be produced may be specified):

See Exhibit A, attached

☐ Continued on Attachment 3 (use form MC-025).

4. Attorneys of record in this action or parties without attorneys are (name, address, telephone number, and name of party represented):

See Exhibit A, attached

☐ Continued on Attachment 4 (use form MC-025).

PLAINTIFF/PETITIONER: GEORGE SCOTT PATERNO, as duly appointed representative of the ESTATE and FAMILY of JOSEPH PATERNO, et al.	CASE NUMBER (of action pending outside California): 2013-2082
DEFENDANT/RESPONDENT: NATIONAL COLLEGIATE ATHLETIC ASSOCIATION, et al.	

5. If you have been served with this subpoena as a custodian of consumer or employee records under Code of Civil Procedure section 1865.6 and a motion to quash or an objection has been served on you, a court order or agreement of the parties, witnesses, and consumer or employee affected must be obtained before you are required to produce consumer or employee records.

6. ☐ Other terms or provisions from out-of-state subpoenas, if any (specify):

☐ Continued on Attachment 6 (use form MG-025).

DISOBEDIENCE OF THIS SUBPOENA MAY BE PUNISHED AS CONTEMPT BY THIS COURT. YOU WILL ALSO BE LIABLE FOR THE SUM OF \$500 AND ALL DAMAGES RESULTING FROM YOUR FAILURE TO OBEY.

Date issued:

Thomas W. Scott
(TYPE OR PRINT NAME)

(SIGNATURE OF PERSON ISSUING SUBPOENA)

Attorney for Defendant National Collegiate Athletic Association
(TITLE)

**PROOF OF SERVICE OF SUBPOENA FOR
PRODUCTION OF BUSINESS RECORDS**

1. I served this Subpoena for Production of Business Records in Action Pending Outside California by personally delivering a copy to the person served as follows:

a. Person served (Name):
b. Address where served:

c. Date of delivery:

d. Time of delivery:

e. Witness fees and mileage both ways (check one):

(1) ☐ were paid. Amount: \$ _____

(2) ☐ were not paid.

(3) ☐ were tendered to the witness's public entity employer as required by Government Code section 68097.2. The amount tendered was (specify): \$ _____

f. Fee for service: \$ _____

2. I received this subpoena for service on (date):

3. ☐ I also served a completed Proof of Service of Notice to Consumer or Employee and Objection (form SUBP-026) by personally delivering a copy to the person served as described in 1 above.

4. Person serving:

- a. ☐ Not a registered California process server
- b. ☐ California sheriff or marshal
- c. ☐ Registered California process server
- d. ☐ Employee or independent contractor of a registered California process server
- e. ☐ Exempt from registration under Business and Professions Code section 22350(b)
- f. ☐ Registered professional photocopier
- g. ☐ Exempt from registration under Business and Professions Code section 22451
- h. Name, address, telephone number, and, if applicable, county of registration and number:

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date:

(For California sheriff or marshal use only)

I certify that the foregoing is true and correct.

Date:

(SIGNATURE)

(SIGNATURE)

CERTIFICATE OF SERVICE

I, Thomas W. Scott, hereby certify that I am serving the *National Collegiate Athletic Association's Notice of Intent to Serve a Subpoena to James T. Clemente* on the following by First Class Mail and email:

Thomas J. Weber, Esquire
GOLDBERG KATZMAN, P.C.
4250 Crums Mill Road, Suite 301
P.O. Box 6991
Harrisburg, PA 17112
Telephone: (717) 234-4161
Email: tjw@goldbergkatzman.com

Wick Sollers, Esquire
L. Joseph Loveland, Esquire
Mark A. Jensen, Esquire
Patricia L. Maher, Esquire
Ashley C. Parrish, Esquire
KING & SPALDING LLP
1700 Pennsylvania Avenue, NW
Washington, DC 20006
Telephone: (202) 737-0500
Email: wsollers@kslaw.com
jloveland@kslaw.com
mjensen@kslaw.com
pmaher@kslaw.com
aparrish@kslaw.com

Counsel for Plaintiffs

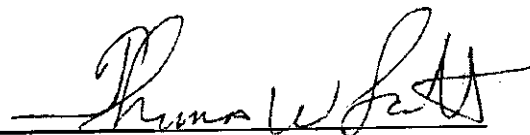
Daniel I. Booker, Esquire
Jack B. Cobetto, Esquire
Donna M. Doblick, Esquire
William J. Sheridan, Esquire
REED SMITH LLP
Reed Smith Centre
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Pittsburgh, PA 15222
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Email: dbooker@reedsmith.com
[jacobetto@reedsmith.com](mailto:jcobetto@reedsmith.com)
ddoblick@reedsmith.com
wsheridan@reedsmith.com

Michael T. Scott, Esquire
REED SMITH LLP
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Joseph P. Green, Esquire
LEE, GREEN & REITER, INC.
115 East High Street
P.O. Box 179
Bellefonte, PA 16823-0179
Telephone: (814) 355-4769
Email: jgreen@lmgrlaw.com

*Counsel for The Pennsylvania State
University*

Dated: April 22, 2015

A handwritten signature in black ink, appearing to read 'Thomas W. Scott', written over a horizontal line.

Thomas W. Scott
KILLIAN & GEPHART, LLP
218 Pine Street
P.O. Box 886
Harrisburg, PA 17108-0886
Telephone: (717) 232-1851
Email: tscott@killiangephart.com

*Counsel for Defendants the NCAA,
Dr. Emmert, and Dr. Ray*

CERTIFICATE OF SERVICE

I, Thomas W. Scott, hereby certify that I am serving *The National Collegiate Athletic Association's Certificate Prerequisite to Service of a Subpoena Pursuant to Rule 4009.22*, by First Class Mail and email to:

Thomas J. Weber, Esquire
GOLDBERG KATZMAN, P.C.
4250 Crums Mill Road, Suite 301
P.O. Box 6991
Harrisburg, PA 17112
Telephone: (717) 234-4161
Email: tjw@goldbergkatzman.com

Wick Sollers, Esquire
L. Joseph Loveland, Esquire
Mark A. Jensen, Esquire
Patricia L. Maher, Esquire
Ashley C. Parrish, Esquire
Alan R. Dial, Esquire
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mjensen@kslaw.com
pmaher@kslaw.com
aparrish@kslaw.com
adial@kslaw.com

Counsel for Plaintiffs

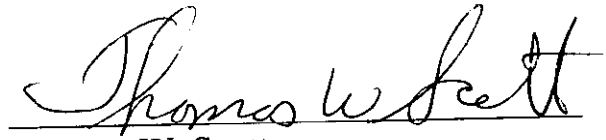
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REED SMITH LLP
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Telephone: (814) 355-4769
Email: jgreen@lmgrlaw.com

*Counsel for The Pennsylvania State
University*

Dated: May 13, 2015

A handwritten signature in cursive script, reading "Thomas W. Scott", written over a horizontal line.

Thomas W. Scott
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*Counsel for Defendants the NCAA, Dr.
Emmert, and Dr. Ray*