



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

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

RYAN McCOMBIE, ANTHONY LUBRANO, AL
CLEMENS, PETER KHOURY, and
ADAM TALIAFERRO, members of the Board of Trustees
of Pennsylvania State University;

PETER BORDI, TERRY ENGELDER,
SPENCER NILES, and JOHN O'DONNELL,
members of the faculty of Pennsylvania State University;

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

ANTHONY ADAMS, GERALD CADOGAN,
SHAMAR FINNEY, JUSTIN KURPEIKIS,
RICHARD GRDNER, JOSH GAINES, PATRICK MAUTI,
ANWAR PHILLIPS, and MICHAEL ROBINSON,
former football players of 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.

) **Docket No.:** 2013-2082
)
) **Type of Case:**
) Declaratory Judgment Injunction
) Breach of Contract
) Tortious Interference with
) Contract
) Defamation
) Commercial Disparagement
) Conspiracy
)
) **Type of Pleading:**
) Joint Stipulation Regarding
) Responses to Plaintiffs' First
) Amended Complaint
)
) **Filed on Behalf of:**
) National Collegiate Athletic Association, Mark Emmert,
) Edward Ray
)
) **Counsel of Record for this Party:**
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COMMON PLEAS COURT
CENTRE COUNTY, PA
JUN 13 2013 10:52 AM

ORIGINAL

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;)
RYAN MCCOMBIE, ANTHONY LUBRANO,)
AL CLEMENS, and ADAM TALIAFERRO, members of the)
Board of Trustees of Pennsylvania State University;)
PETER BORDI, TERRY ENGELDER,)
SPENCER NILES, and JOHN O'DONNELL,)
members of the faculty of Pennsylvania State University;)
WILLIAM KENNEY and JOSEPH V. ("JAY") PATERNO,)
former football coaches at Pennsylvania State University; and)
ANTHONY ADAMS, GERALD CADOGAN,)
SHAMAR FINNEY, JUSTIN KURPEIKIS,)
RICHARD GARDNER, JOSH GAINES, PATRICK MAUTI,)
ANWAR PHILLIPS, and MICHAEL ROBINSON, former)
football players of 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.

Civil Division

Docket No. 2013-2082

FILED
2014 MAR 3 11 3:29 AM
CENTRE COUNTY, PA

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JOINT STIPULATION REGARDING
RESPONSES TO PLAINTIFFS' FIRST AMENDED COMPLAINT

Whereas, on February 5, 2014, Plaintiffs filed a First Amended Complaint (the “Amended Complaint”) in this action;

Whereas Plaintiffs and Defendant the National Collegiate Athletic Association, Mark Emmert, and Edward Ray (collectively, “NCAA Defendants”) previously agreed that any response to an Amended Complaint, including preliminary objections, would be due on or before March 7, 2014;

Whereas the Amended Complaint named The Pennsylvania State University (“Penn State”) as a party;

Whereas, based on the date Penn State was served with a copy of the Amended Complaint, Penn State’s preliminary objections, if any, would be due on or before March 17, 2014;

Whereas the parties believe it is proper and efficient to establish a uniform briefing schedule across all parties with respect to any preliminary objections;

Therefore, the parties, by and through undersigned counsel, agree and jointly stipulate as follows:

1. The NCAA Defendants and Penn State shall each file preliminary objections—or otherwise respond—to Plaintiffs’ Amended Complaint on or before March 17, 2014;

2. Plaintiffs' response to the NCAA Defendants' preliminary objections and Penn State's preliminary objections shall be due on or before April 16, 2014;
3. The NCAA Defendants' reply and Penn State's reply to Plaintiffs' response shall be due on or before May 6, 2014.

AGREED TO BY:



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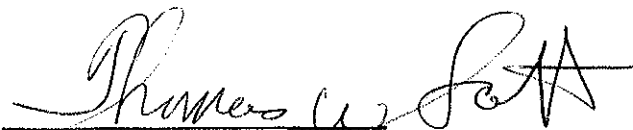
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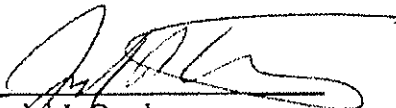
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*Counsel for The Pennsylvania State
University*

SO ORDERED.

BY THE COURT:

John B. Leete, Senior Judge
Specially Presiding

CERTIFICATE OF SERVICE

I, Thomas W. Scott, hereby certify that I am serving the foregoing Joint Stipulation Regarding Responses to Plaintiffs' First Amended Complaint by First Class Mail and email to:

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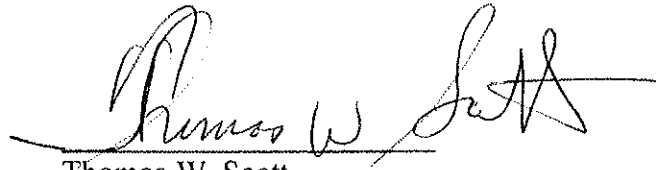
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Counsel for The Pennsylvania State University

Via Federal Express, Overnight
The Honorable John B. Leete, S. J.
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Counsel for Plaintiffs

Dated: March 3, 2014

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

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