

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

**MOTION TO ENTER
STIPULATED
SCHEDULING ORDER**

Filed on Behalf of:
The Pennsylvania State
University

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MOTION TO ENTER STIPULATED SCHEDULING ORDER


1. On April 4, 2014, counsel for Plaintiff George Scott Paterno as duly appointed representative of the Estate and Family of Joseph Paterno ("Paterno") filed a Motion to Overrule Objections By Defendant Penn State University to Notice of Intent to Issue Subpoena to Pepper Hamilton LLP (the "Motion").

2. Counsel for Paterno and counsel for The Pennsylvania State University ("PSU") have agreed upon a schedule for answering and briefing the Motion. Specifically, as reflected on the proposed Stipulated Scheduling Order attached hereto, the parties propose that PSU file its response to the Motion on April 18, 2014, and that the parties exchange briefs in support of their respective positions on May 2, 2014.

3. PSU respectfully asks the Court to schedule oral argument on the Motion. Although Paterno does not join in that request, he does not oppose it.

WHEREFORE, The Pennsylvania State University respectfully requests that the Court enter the attached Stipulated Scheduling Order.

Respectfully submitted,



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Attorneys for
The Pennsylvania State University

Dated: April 10, 2014

CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that on this 10th day of April, 2014, a true and correct copy of the foregoing Motion to Enter Stipulated Scheduling Order was served upon the following counsel via email and via U.S. mail, first class, postage prepaid:

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