



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,)

Docket No. 2013-2082

and)

Type of Case: Civil Action

RYAN McCOMBIE, ANTHONY LUNBRANO,)
TALIAFERRO, Members of the Board of Trustees)
of Pennsylvania State University,)

Type of Pleading:
Motion to File Under Seal

and)

Filed on behalf of:
NON-PARTY, JOHN DOE 71

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

Counsel of Record for this Party:

and)

Andrew J. Shubin
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814-867-3115
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WILLIAM KENNEY and JOSEPH V. ("JAY"))
PATERNO, former football Coaches at)
Pennsylvania State University, and)

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");)

and)

MARK EMMERT, individually and as President)
of the NCAA;)
and)

DEBIM O. HANSEL
PROTHONOTARY
CENTRE COUNTY, PA
2016 JUN 22 PM 4:40

EDWARD RAY, individually and as former)
Chairman of the Executive Committee of the)
NCAA,)
Defendants.)

MOTION TO FILE DOCUMENT UNDER SEAL

NOW COMES Non-Party, John Doe 71, and moves this Court to seal his Motion for a Protective Order for the following reasons:

1. John Doe 71 is a 60-year-old adult survivor of Jerry Sandusky’s child sexual abuse with significant emergent cardiac issues, and the information contained in the motion implicates serious privacy, confidentiality, anonymity, and health related safety concerns.
2. Pennsylvania law recognizes the importance of protecting the identity of childhood sexual abuse victims in 42 Pa. C.S. § 5988, stating that “notwithstanding any other provision of law to the contrary, in a prosecution involving a minor victim of sexual or physical abuse, the name of the minor victim shall not be disclosed by officers or employees of the court to the public, and any records revealing the name of the minor victim shall not be open to public inspection.”
3. John Doe 71 intends on filing a motion for a protective order aimed at preserving his anonymity and privacy, and protecting his health and safety related concerns. Doe is a State College resident whose spouse is employed by Penn State University.

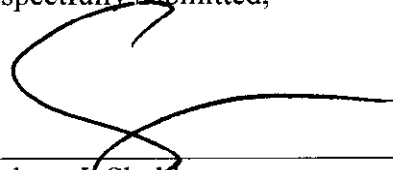
DEBRA C. MARTEL
PROTHONOTARY
CENTRE COUNTY, PA
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WHEREFORE, this Court should enter an order sealing John Doe 71's Motion for Protective Order.

9/22/2016

Date

Respectfully submitted,



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Chairman of the Executive Committee of the)
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)
)
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CERTIFICATE OF SERVICE

I certify that I caused I certify that I caused to be served on Judge Leete and all counsel listed below via email and/or overnight delivery and/or first-class mail, postage pre-paid, the Motion to File Document Under Seal.

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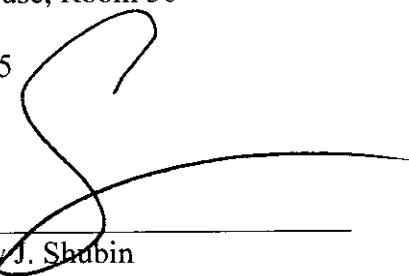
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6-22-16

Date



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