



IN THE COURT OF COMMON PLEAS OF CENTRE COUNTY, PENNSYLVANIA

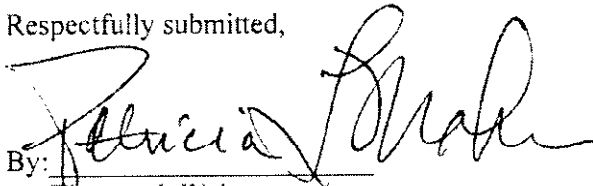
The ESTATE of JOSEPH PATERNO; and	)	
	)	Civil Division
WILLIAM KENNEY and JOSEPH V. ("JAY")	)	
PATERNO, former football coaches at	)	Docket No. 2013-2082
Pennsylvania State University,	)	
Plaintiffs,	)	<b>Motion to Seal</b>
	)	Filed on Behalf of the Plaintiffs
v.	)	
	)	
NATIONAL COLLEGIATE ATHLETIC	)	
ASSOCIATION ("NCAA");	)	Counsel of Record:
	)	Thomas J. Weber
MARK EMMERT, individually and as	)	Katherine E. Peters
President of the NCAA; and	)	GOLDBERG KATZMAN, P.C.
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Chairman of the Executive Committee of the	)	Harrisburg, PA 17112
NCAA,	)	Telephone: (717) 234-4161
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Defendants.	)	
	)	Wick Sollers (admitted <i>pro hac vice</i> )
	)	L. Joseph Loveland (admitted <i>pro hac vice</i> )
	)	Patricia L. Maher (admitted <i>pro hac vice</i> )
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 CENTRE COUNTY, PA



Confidential” under the Protective Order. Plaintiffs’ Response refers to the same “Highly Confidential” document and information as the NCAA’s Motion for Leave. Accordingly, pursuant to paragraph 9 of the Protective Order, Plaintiffs respectfully request that the Court enter an Order of the form submitted with this motion, directing that the attached unredacted version of Plaintiffs’ Response to Defendant NCAA’s Motion for Leave to Depose Timothy M. Curley be sealed, and that the Prothonotary file it under seal.

Respectfully submitted,

  
By: \_\_\_\_\_

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DATED: March 31, 2017

*Counsel for Plaintiffs*

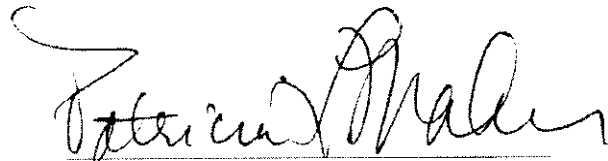
**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing **PLAINTIFFS'**  
**MOTION TO SEAL** was served this 31st day of March 2017 by email and first class mail to the  
following:

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