



0000RC5F CCGPRO 201503

IN THE COURT OF COMMON PLEAS FOR CENTRE COUNTY PENNSYLVANIA
CIVIL DIVISION

ESTATE of JOSEPH PATERNO;

No. 2013-2082

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.

FILED FOR RECORD
2015 APR 20 AM 10:13
DEBRA C. INKEL
PROTHONOTARY
CENTRE COUNTY, PA

Response to Statement of Errors Complained of

Presently before the Court is an appeal from non-party Pepper Hamilton alleging that this Court erred in its Opinion and Order, dated November 20, 2014, in

which the Court denied a Motion for Stay Pending Appeal and for a Protective Order by Non-Party Pepper Hamilton.

The Court relies on its Opinion and Order, dated November 20, 2014. Further, the Court notes that this issue will become moot when the Superior Court renders its decision regarding Penn State's appeal of this Court's September 11, 2014, Order. Therefore, the Court respectfully requests that the Order of November 20, 2014, remain undisturbed.

BY THE COURT

J. 