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8 Attorneys for Defendant
 ELECTRONIC ARTS INC.
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10 UNITED STATES DISTRICT COURT
 11 NORTHERN DISTRICT OF CALIFORNIA
 12 OAKLAND DIVISION

13 IN RE NCAA STUDENT-ATHLETE NAME
 & LIKENESS LICENSING LITIGATION,
 14

Case No. CV-09-1967-CW (NC)

**STIPULATION AND [PROPOSED]
 ORDER**

Judge: Hon. Claudia Wilken

Date Comp. Filed: May 5, 2009

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1 Counsel for the Antitrust Plaintiffs, the Right of Publicity Plaintiffs, Defendant Electronic
2 Arts Inc. (“EA”), and Defendant Collegiate License Company (“CLC”) (collectively “Settling
3 Parties”) hereby notify the Court that they have reached a settlement of all claims asserted by all
4 Plaintiffs in this matter against EA and CLC. This settlement does not affect Plaintiffs’ claims
5 against Defendant National Collegiate Athletic Association. The terms of the settlement are
6 confidential until presented to the Court for approval.

7 The Settling Parties are in the process of preparing the documents necessary to present to
8 the Court for preliminary approval of the settlement. So that they may focus on preparing those
9 papers, the settling parties stipulate and jointly request that the Court stay all litigation and vacate
10 all deadlines as to EA and CLC. The Settling Parties will submit preliminary approval papers as
11 soon as practicable.

12 Dated: September 26, 2013

KEKER & VAN NEST LLP

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15 By: /s/ R. James Slaughter
ROBERT A. VAN NEST
R. JAMES SLAUGHTER
ASIM M. BHANSALI

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17 Attorneys for Defendant
ELECTRONIC ARTS INC.

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19 Dated: September 26, 2013

KILPATRICK TOWNSEND LLP

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21 By: /s/ R. Charles Henn, Jr.
R. CHARLES HENN, JR.
PETER M. BOYLE

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23 Attorneys for Defendant
COLLEGIATE LICENSING COMPANY
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1 Dated: September 26, 2013

HAGENS BERMAN SOBOL
SHAPIRO LLP

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By: /s/Robert B. Carey
Steve W. Berman
Robert B. Carey

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Plaintiffs' Interim Co-Lead Counsel with
Principal Responsibility for the Right of
Publicity Claims

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9 Dated: September 26, 2013

HAUSFELD LLP

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By: /s/ Michael P. Lehmann
MICHAEL D. HAUSFELD
MICHAEL P. LEHMANN

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Plaintiffs' Interim Co-Lead Counsel with
Principal Responsibility for the Antitrust
Claims

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[PROPOSED] ORDER

PURSUANT TO THE PARTIES' STIPULATION, and for good cause shown, the Court hereby vacates all deadlines with respect to EA and CLC.

IT IS SO ORDERED.

Dated: _____

Hon. Claudia Wilken
UNITED STATES DISTRICT JUDGE