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13 *Antitrust Plaintiffs' Class Counsel*

14 UNITED STATES DISTRICT COURT  
 15 NORTHERN DISTRICT OF CALIFORNIA  
 16 OAKLAND DIVISION  
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18  
 19 EDWARD O'BANNON, *et al.*,  
 20 Plaintiffs,  
 21 v.  
 22 NATIONAL COLLEGIATE ATHLETIC  
 23 ASSOCIATION; COLLEGIATE  
 24 LICENSING COMPANY; and  
 ELECTRONIC ARTS INC.,  
 25 Defendants.  
 26

Case No. 4:09-cv-3329 CW

ANTITRUST PLAINTIFFS' PROPOSED  
FORM OF INJUNCTION

Judge: The Honorable Claudia Wilken  
 Courtroom: 2, 4th Floor  
 Trial: June 9, 2014

1 Pursuant to the direction of the Court at the May 28, 2014 pretrial hearing and the order  
2 resolving motions *in limine* (*Keller* Dkt. No. 1105 at 12), attached as Exhibit A is the Antitrust  
3 Plaintiffs' Proposed Form of Injunction, without prejudice to further modification at trial. This  
4 proposal is based in part on injunctions entered in cases such as *Board of Regents of Univ. of*  
5 *Okla. v. NCAA*, 601 F.Supp. 307, 308 (W.D. Okla. 1984); *Mackey v. NFL*, 407 F.Supp. 1000,  
6 1011 (D. Minn. 1975), *aff'd*, 543 F.2d 606 (8th Cir. 1976), *cert. denied*, 434 U.S. 701 (1977); and  
7 the "Third Amended Judgment and Final Decree" (Feb. 12, 2014) (Dkt. No. 835) in *In re Vitamin*  
8 *C Antitrust Litig.*, No. 1:06-md-01738-BMC-JO (E.D.N.Y.).

9  
10 Dated: June 6, 2014

Respectfully submitted,

11 By: /s/ Michael P. Lehmann

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*Antitrust Plaintiffs' Class Counsel*

**CERTIFICATE OF SERVICE**

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I hereby certify that on June 6, 2014, I served the foregoing document on counsel by filing it via the Court's CM/ECF system, which will send an email notice to all registered parties.

/s/ Sathya S. Gosselin  
Sathya S. Gosselin