

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

THOMAS LAUMANN, FERNANDA
GARBER, ROBERT SILVER, DAVID
DILLON, GARRETT TRAUB, and PETER
HERMAN, representing themselves and all
others similarly situated,

Plaintiffs,

v.

NATIONAL HOCKEY LEAGUE, et al.,

Defendants

12-cv-1817 (SAS)

FERNANDA GARBER, MARC LERNER,
DEREK RASMUSSEN, ROBERT SILVER,
GARRETT TRAUB, and VINCENT
BIRBIGLIA, representing themselves and all
others similarly situated,

Plaintiffs,

v.

OFFICE OF THE COMMISSIONER OF
BASEBALL, et al.,

Defendants

12-cv-3704 (SAS)

ECF Cases

**PLAINTIFFS' MOTIONS FOR
CLASS CERTIFICATION AND APPOINTMENT OF CLASS COUNSEL**

Pursuant to Rule 23 of the Federal Rules of Civil Procedure, the Plaintiffs¹ in both matters hereby move for class certification and the appointment of class counsel. Plaintiffs request that the Court appoint Langer, Grogan & Diver, P.C., lead class counsel. The grounds for these motions are set forth in Plaintiffs' Memorandum of Law and are further supported by the Declarations of Roger Noll, any papers filed in reply, and all papers and records on file in this matter.

Dated: September 19, 2014

Respectfully Submitted,

/s/ Edward Diver

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¹ The moving plaintiffs in *Laumann* are Thomas Laumann, David Dillon, Robert Silver, and Garret Traub. The moving plaintiffs in *Garber* are Marc Lerner, Derek Rasmussen, Garrett Traub, and Vincent Birbiglia.

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