

EXHIBIT A

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

EDWARD O'BANNON, *et al.*,

Plaintiffs,

v.

NATIONAL COLLEGIATE ATHLETIC
ASSOCIATION; COLLEGIATE
LICENSING COMPANY; and
ELECTRONIC ARTS INC.,

Defendants.

Case No. 4:09-cv-3329-CW

**[PROPOSED] ORDER GRANTING
INJUNCTIVE RELIEF**

1 The Court, having duly considered the evidence presented at the bench trial in this matter
2 and consistent with its findings of fact and conclusions of law hereby orders as follows:

3 1. Defendant National Collegiate Athletic Association (“NCAA”), its respective
4 officers, member institutions, conferences, agents, servants, employees, licensees, and all
5 persons in active concert or participation with it, or any of them who receives actual notice of
6 this judgment by personal service or otherwise, be, and are hereby, permanently restrained and
7 enjoined from following, executing or attempting to execute, enacting, agreeing to, or enforcing
8 or attempting to enforce any constitutional provision, bylaw, rule, regulation, interpretation,
9 policy, or eligibility form to the extent that it fixes or causes to be fixed the price of current or
10 former Division I men’s basketball and FBS football athletes’ names, images, and likenesses
11 (“NILs”) or otherwise forecloses those athletes from being compensated, agreeing to be
12 compensated, or receiving offers of compensation for the use or licensing of their NILs,
13 including by loss or threatened loss of athletic eligibility.

14 2. Defendant National Collegiate Athletic Association (“NCAA”), its respective
15 officers, member institutions, conferences, agents, servants, employees, licensees, and all
16 persons in active concert or participation with it, or any of them who receives actual notice of
17 this judgment by personal service or otherwise, be, and are hereby, permanently restrained and
18 enjoined from violating or continuing to violate Section 1 of the Sherman Act (15 U.S.C. § 1).

19 3. Any party may seek modification of this Order, at any time, by written motion
20 and for good cause based on changed circumstances or otherwise.

21 4. This Court shall retain jurisdiction to enforce this Order. In the event that any part
22 of this Order is violated by the parties named herein or other persons, Plaintiffs may, by motion
23 with notice to the attorneys for the Defendants, apply for sanctions or other relief that may be
24 appropriate.

25 IT IS SO ORDERED.

26 Dated: _____
27 _____
28 The Honorable Claudia Wilken
United States Chief District Judge