

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA

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NATIONAL FOOTBALL LEAGUE PLAYERS :
ASSOCIATION, on its own behalf and on behalf :
of TOM BRADY, :

Petitioner,

-v.-

NATIONAL FOOTBALL LEAGUE and :
NATIONAL FOOTBALL LEAGUE :
MANAGEMENT COUNCIL, :

Respondents.

Case No.

**EX PARTE MOTION TO
SEAL PORTIONS OF
PETITION,
MEMORANDUM AND
CERTAIN EXHIBITS
THERE TO**

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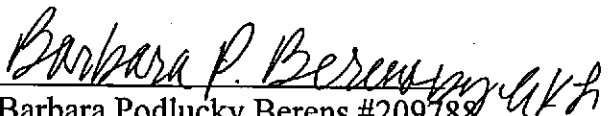
Petitioner National Football League Players Association (“NFLPA”), the union for players in the National Football League, on its own behalf and on behalf of New England Patriots quarterback Tom Brady, hereby moves the Court on an *ex parte* basis for an *ex parte* order granting permission to file under seal: (i) certain portions of a Petition to Vacate Arbitration Award (the “*Brady* Petition”); (ii) certain portions of a Memorandum of Law in Support of Motion for Preliminary Injunction, or in the alternative, for Expedited Disposition (the “*Brady* Memorandum”); and (iii) certain exhibits submitted in support of the *Brady* Petition and preliminary injunction motion (“Confidential Exhibits”).

The NFLPA makes the motion to seal portions of the *Brady* Petition, *Brady* Memorandum and Confidential Exhibits, in order to comply with existing confidentiality

agreements with Respondents National Football League and National Football League Management Council.

This motion is based upon the accompanying memorandum of law, affidavit of Erin K. F. Lisle, as well as any arguments of counsel and all other pleadings and papers on file in this action.

Dated: July 29, 2015


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