

**BEFORE THE JUDICIAL PANEL ON MULTIDISTRICT LITIGATION**

IN RE NATIONAL FOOTBALL  
LEAGUE LITIGATION

MDL DOCKET NO. \_\_\_\_\_

**MOTION FOR TRANSFER AND COORDINATION OR  
CONSOLIDATION PURSUANT TO 28 U.S.C. § 1407**

Pursuant to 28 U.S.C. § 1407, the National Football League (“NFL”) respectfully petitions the Judicial Panel on Multidistrict Litigation (the “Panel”) for an order transferring four actions pending against it in the United States District Courts for the Central District of California and Eastern District of Pennsylvania (collectively “the Actions”) for coordinated or consolidated pretrial proceedings in the Eastern District of Pennsylvania. In support of this motion, the NFL avers the following, as more fully set forth in the accompanying Memorandum of Law:

1. The Actions are listed on the Schedule of Actions in accordance with the Panel’s Rule 6.1(b)(ii); all complaints, federal district court docket sheets and notices of removal in the Actions are annexed hereto as Exhibits A through D.
2. The Actions are all civil actions pending in two federal jurisdictions: Three Actions are pending in the Central District of California, and one Action is pending in the Eastern District of Pennsylvania.
3. All of the Actions “involv[e] one or more common questions of fact,” as required by 28 U.S.C. § 1407(a), because they are based on similar allegations

seeking to hold the NFL liable for purported damages sustained by former players who suffered concussions while playing football.

4. Because the Actions involve common questions of fact, coordination or consolidation of the Actions in a single forum will significantly advance the just and efficient conduct of the litigation as well as the convenience of the parties and witnesses. Coordination or consolidation also will eliminate duplicative discovery, prevent conflicting pretrial rulings, conserve judicial resources, reduce the cost of litigation, and allow the Actions to proceed more efficiently to trial.

5. As explained in detail in the accompanying Memorandum of Law, the Eastern District of Pennsylvania is the most suitable transferee forum for the Actions because (a) an Action already is pending before Judge Anita B. Brody of the Eastern District of Pennsylvania; (b) the Eastern District of Pennsylvania is a convenient forum for many defendants and potential witnesses in the Actions, with the NFL headquartered in nearby New York City, and the plaintiffs in the Actions pending in the Central District of California, more than half of whom reside in the Eastern part of the United States, and nearly half of whom reside along the East Coast; and (c) Judge Brody has experience in handling complex litigations, including a recent action transferred by the Panel to her courtroom.

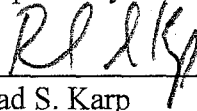
6. This motion is based on the accompanying Memorandum of Law in Support of Motion for Transfer and Coordination or Consolidation Pursuant to 28 U.S.C. § 1407.

WHEREFORE, the NFL respectfully requests that the Panel grant this motion pursuant to 28 U.S.C. § 1407, and that the Actions pending against the NFL be

transferred and coordinated or consolidated for pretrial proceedings in the United States District Court for the Eastern District of Pennsylvania.

Dated: New York, New York  
November 15, 2011

Respectfully submitted,



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