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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES
CENTRAL CIVIL WEST**

IN RE: TV WRITERS CASES,

[Assigned to Hon. Emilie H. Elias
for all purposes]

THIS DOCUMENT RELATES TO:

Case No. BC 268 836

- Alch, et al., v. Time Warner Entertainment,
Company, et al., Case No. BC 268 836;
- Neal, et al., v. Viacom Inc. and United Paramount,
Network, et al., Case No. BC 268 837;
- Young, et al., v. DreamWorks SKG TV LLC ,
Case No. BC 268 838;
- Bast, et al., v. Fox, Broadcasting Company, et al.,
Case No. BC 268 839;
- Levy, et al., v. The Gersh Agency, Inc., Case No.
BC 268 840;
- Edwards, et al., v. The Carsey-Werner, Company,
et al., Case No. BC 268 841;
- Wynn, et al., v. National Broadcasting Company,
Inc., et al., Case No. BC 268 842;
- Brooks, et al., v. William Morris Agency,
Case No. BC 268 843;
- Brett, et al., v. The Walt Disney Company, et al.,
Case No. BC 268 844;
- DiStefano, et al., v. Columbia TriStar Television,
Inc., Case No. BC 268 845;
- Eisenson, et al., v. Lucy Stille & Associates, Inc.,
d/b/a Paradigm Talent & Literary Agency, et
al., Case No. BC 268 847;
- Lang, et al., v. Shapiro-Lichtman, Inc., d/b/a
Shapiro-Lichtman-Stein, Case No. BC 268
848;

**[Proposed]
CONFIDENTIALITY ORDER**

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Neal, et al., v. The Endeavor Agency, Inc., Case No. BC 268 849;
Kinghorn, et al., v. Universal Studios, Inc., et al., Case No. BC 268 877;
Moriarty, et al., v. Viacom Inc., and Paramount Studios, Inc., et al., Case No. BC 268 878;
Yanok, et al., v. Agency for the Performing Arts, Inc., Case No. BC 268 880;
Schwartz, et al., v. United Talent Agency, Inc., Case No. BC 268 881;
Shayne, et al., v. Viacom Inc. and CBS Broadcasting, Inc., Case No. BC 268 882,
Kalish, et al., v. Viacom Inc., et al., Case No. BC 268 883.

1 **IT IS HEREBY ORDERED THAT:**

2 1. Defendants' outside and in-house counsel with duties including the evaluation or
3 response to asserted, threatened or potential claims, or any staff of any such outside or in-house
4 counsel (together "Counsel"), may receive or review upon request a complete set of the
5 Confidentiality Agreements (Section XI of Claim Form), Tax Indemnification Agreements
6 (Section XII of Claim Form), and ADEA Acknowledgments (Section XIII of Claim Form)
7 (collectively, "Claim Agreements") executed and submitted as part of the claim submission
8 process and/or otherwise be informed of the identity of any Eligible Claimant, and/or may
9 receive or review upon request a copy of a list of claimants whom the Claims Administrator has
10 determined are not Settlement Class Members pursuant to the procedures set forth in
11 Administrative Order No. 4 (collectively, "Claimants"), but only upon execution of the
12 Acknowledgement of Receipt of Confidentiality Order attached hereto as Exhibit A.

13 2. Except as set forth in Paragraph 3 below, Counsel may not disclose, disseminate
14 or make available in any other way to any non-Counsel (whether orally, in writing, or by any
15 other means) the name or identity of any Claimant or any other information from which any non-
16 Counsel reasonably may be able to infer the identity of any such person (e.g., by identifying a
17 Claimant by show and position).

18 3. The prohibition in Paragraph 2 shall end as to any Claimant when outside or in-
19 house counsel forms a good faith belief that such Claimant has asserted in an administrative
20 charge or lawsuit or other adversarial proceeding, or has overtly threatened to assert, a claim that
21 may be covered by the releases set forth in the Settlement Agreement. Upon the formation of
22 this good faith belief, the Claim Agreements bearing such Claimant's name and the fact of claim
23 submission and execution of the Claim Agreements shall no longer be confidential and may be
24 used in any manner to evaluate, respond to, and/or defend against the claim or threatened claim
25 and distributed to anyone involved in evaluating, providing or receiving legal advice with regard
26 to responding to and/or defending the claim or threatened claim.

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1 DATED: January __, 2010

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By: _____
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Attorney for Defendants
BC 268 842 and BC 268 877

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7 DATED: January __, 2010

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By: _____
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DATED: January __, 2010

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WALKER
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By: _____
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BC 268 844

DATED: January __, 2010

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BC 268 847

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Robert Barnes

By: _____
Robert Barnes
Attorney for Defendant
BC 268 880

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Judith Shapiro

By: _____
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DATED: January __, 2010

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Mark Block

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Mark Block
Attorney for Defendant
BC 268 849

DATED: January __, 2010

THE GERSH AGENCY, INC.
Robert Gersh

By: _____
Robert Gersh
Co-President
BC 268 840

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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES
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IN RE: TV WRITERS CASES,

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- Levy, et al., v. The Gersh Agency, Inc., Case No. BC 268 840;
- Edwards, et al., v. The Carsey-Werner, Company, et al., Case No. BC 268 841;
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- Lang, et al., v. Shapiro-Lichtman, Inc., d/b/a Shapiro-Lichtman-Stein, Case No. BC 268 848;

**EXHIBIT A
ACKNOWLEDGEMENT
OF RECEIPT OF
CONFIDENTIALITY ORDER**

1 Neal, et al., v. The Endeavor Agency, Inc., Case No.
2 BC 268 849;
3 Kinghorn, et al., v. Universal Studios, Inc., et al.,
4 Case No. BC 268 877;
5 Moriarty, et al., v. Viacom Inc., and Paramount,
6 Studios, Inc., et al., Case No. BC 268 878;
7 Yanok, et al., v. Agency for the Performing Arts,
8 Inc., Case No. BC 268 880;
9 Schwartz, et al., v. United Talent Agency, Inc., Case
10 No. BC 268 881;
11 Shayne, et al., v. Viacom Inc. and CBS
12 Broadcasting, Inc., Case No. BC 268 882,
13 Kalish, et al., v. Viacom Inc., et al., Case No. BC
14 268 883.
15

16 I have reviewed the Confidentiality Order entered pursuant to the Settlement Agreement
17 in the above-captioned cases, and have had the opportunity to review the Settlement Agreement.
18 By signing this Acknowledgement, I acknowledge that I am a Counsel within the meaning of the
19 Confidentiality Order, that I am bound by the provisions of the Confidentiality Order, and that
20 any claim of breach of the Confidentiality Order would be determined through the Dispute
21 Resolution Mechanism set forth in Section XVIII of the Settlement Agreement.
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Date Signature

Print Name