

**IN THE SUPREME COURT OF FLORIDA**

**NATIONAL COLLEGIATE  
ATHLETIC ASSOCIATION,**

**Appellant,**

**Case No.: SC09-1909**

**Lt. Case Nos.: 1D09-4385**

**2009-CA-002298**

**vs.**

**THE ASSOCIATED PRESS, ET AL.,**

**Appellees.**

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**VERIFIED MOTION FOR ADMISSION TO APPEAR *PRO HAC VICE*  
PURSUANT TO FLORIDA RULE OF JUDICIAL  
ADMINISTRATION 2.510**

Comes now Linda J. Salfrank, Movant herein, and respectfully represents the following:

1. Movant resides in Parkville, Missouri. Movant is not a resident of the State of Florida.
2. Movant is an attorney and a member of the law firm of Spencer Fane Britt & Browne LLP, with offices at 1000 Walnut, Suite 1400, Kansas City, Jackson County, Missouri 64106, (816) 474-8100.
3. Movant has been retained personally on July 13, 2009 by the National Collegiate Athletic Association to provide legal representation in connection with

the above-styled matter now pending before the above-named court of the State of Florida.

4. Movant is an active member in good standing and currently eligible to practice law in the following jurisdiction(s): Include attorney or bar number(s). (Attach an additional sheet if necessary.)

**JURISDICTION ATTORNEY/BAR NUMBER:**

State of Missouri Bar No. 38119  
United States District Court for the Western District of Missouri  
United States Court of Appeals for the Second Circuit  
United States Court of Appeals for the Eighth Circuit  
United States Court of Appeals for the Tenth Circuit

5. There are no disciplinary proceedings pending against Movant, except as provided below (give jurisdiction of disciplinary action, date of disciplinary action, nature of the violation and the sanction, if any, imposed):

(Attach an additional sheet if necessary.)

N/A  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

6. Within the past five (5) years, Movant has not been subject to any disciplinary proceedings, except as provided below (give jurisdiction of disciplinary action, date of disciplinary action, nature of the violation and the sanction, if any, imposed):

(Attach an additional sheet if necessary.)

N/A

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7. Movant has never been subject to any suspension proceedings, except as provided below (give jurisdiction of disciplinary action, date of disciplinary action, nature of the violation and the sanction, if any, imposed):

(Attach an additional sheet if necessary.)

N/A

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8. Movant has never been subject to any disbarment proceedings, except as provided below (give jurisdiction of disciplinary action, date of disciplinary action, nature of the violation and the sanction, if any, imposed):

(Attach an additional sheet if necessary.)

N/A

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9. Movant, either by resignation, withdrawal, or otherwise, never has terminated or attempted to terminate Movant's office as an attorney in order to avoid administrative, disciplinary, disbarment, or suspension proceedings.

- 10. Movant is not an inactive member of The Florida Bar.
- 11. Movant is not now a member of The Florida Bar.
- 12. Movant is not a suspended member of The Florida Bar.
- 13. Movant is not a disbarred member of The Florida Bar nor has Movant received a disciplinary resignation from The Florida Bar.

14. Movant has not previously been disciplined or held in contempt by reason of misconduct committed while engaged in representation pursuant to Florida Rule of Judicial Administration 2.510, except as provided below (give date of disciplinary action or contempt, reasons there for, and court imposing contempt):

(Attach an additional sheet if necessary.)

N/A

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15. Movant has filed motion(s) to appear as counsel in Florida state courts during the past five (5) years in the following matters: (Attach an additional sheet if necessary.)

Date of Motion Case Name Case Number Court Date Motion Granted/Denied

7/24/09, Associated Press, et al v. Florida State University Board of Trustees, et al, Case No. 2009-CA-2298, Order on Pretrial Motion entered on 8/10/09 granting Motion to Appear Pro Hac Vice

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16. Local counsel of record associated with Movant in this matter is Leonard J. Dietzen (FL Bar No. 0840912) who is an active member in good standing of The Florida Bar and has offices at Rumberger, Kirk & Caldwell, 215 South Monroe Street, Suite 130, Tallahassee, FL 32301 (850) 222-6550.

(If local counsel is not an active member of The Florida Bar in good standing, please provide information as to local counsel's membership status.

N/A\_\_\_\_\_)

17. Movant has read the applicable provisions of Florida Rule of Judicial Administration 2.510 and Rule 1-3.10 of the Rules Regulating The Florida Bar and certifies that this verified motion complies with those rules.

18. Movant agrees to comply with the provisions of the Florida Rules of Professional Conduct and consents to the jurisdiction of the courts and the Bar of the State of Florida.

WHEREFORE, Movant respectfully requests permission to appear in this court for this cause only.

DATED this \_\_\_\_\_ day of September, 2009.

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Linda J. Salfrank  
Spencer Fane Britt & Browne LLP  
1000 Walnut, Suite 1400  
Kansas City, MO 64106

Telephone: (816) 474-8100  
Facsimile: (816) 474-3216

STATE OF MISSOURI

COUNTY OF JACKSON

I, Linda J. Salfrank, do hereby swear or affirm under penalty of perjury that I am the Movant in the above-styled matter; that I have read the foregoing Motion and know the contents thereof, and the contents are true of my own knowledge and belief.

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Linda J. Salfrank

I hereby consent to be associated as local counsel of record in this cause pursuant to Florida Rule of Judicial Administration 2.510.

DATED this \_\_\_\_\_ day of September, 2009.

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Leonard J. Dietzen, III  
Florida Bar No. 0840912  
RUMBERGER, KIRK & CALDWELL,  
P.A.  
215 South Monroe St., Suite 130  
Tallahassee, Florida 32301  
(850) 222-6550  
(850) 222-8783 - Facsimile

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing motion was furnished by U.S. mail to PHV Admissions, The Florida Bar, 651 East Jefferson Street, Tallahassee, Florida 32399-2333 accompanied by payment of the \$250.00 filing fee made payable to The Florida Bar and to Gregg D. Thomas, Carol Jean LoCicero and Rachel E. Fugate, Thomas, LoCicero & Bralow PL, 400 N. Ashley Drive, Suite 1100, Tampa, FL 33602; Davis S. Barlow, Thomas, LoCicero & Bralow PL, 220 E. 42<sup>nd</sup> Street, Suite 400, New York, NY 10012, Attorneys for Plaintiffs; George Freeman, The New York Times Company, 620 Eighth Avenue, New York, NY 10018; George Gabel, Holland & Knight LLP, 50 North Laura Street, Suite 3900, Jacksonville, FL 32202; Michael J. Glazer, Ausley & McMullen, 227 South Calhoun Street, P.O. Box 391, Tallahassee, FL 32301, Of Counsel; Betty Jolene Steffens, Florida State University, 211 Westcott Building, Tallahassee, FL 32306-1470; Peter Antonacci and Bill Williams and Gray Robinson, P.A., 31 S. Bronogh Street, Suite 600, Tallahassee, FL 32301, Attorneys for Defendants this \_\_\_\_\_ day of October, 2009.

**CERTIFICATE OF COMPLIANCE**

I HEREBY CERTIFY that the foregoing brief has been typed using the Times New Roman 14-point font, and therefore complies with the font requirements of Florida Rule of Appellate Procedure 9.210(a)(2).

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