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12 *Attorneys for Plaintiffs*

13 UNITED STATES DISTRICT COURT
 14 NORTHERN DISTRICT
 15 SAN FRANCISCO DIVISION

16 BERNARD PAUL PARRISH, HERBERT
 17 ANTHONY ADDERLY, and WALTER
 18 ROBERTS III, on behalf of themselves and
 19 all others similarly situated,

19 Plaintiffs,

20 vs.

21 NATIONAL FOOTBALL LEAGUE
 22 PLAYERS ASSOCIATION, a Virginia
 23 corporation, and NATIONAL FOOTBALL
 24 LEAGUE PLAYERS INCORPORATED
 25 d/b/a PLAYERS INC, a Virginia
 26 corporation,

25 Defendants.

CIVIL ACTION NO. C07 0943 WHA

DECLARATION OF RYAN S. HILBERT
 IN SUPPORT OF PLAINTIFFS'
 CONSOLIDATED OPPOSITION TO
 DEFENDANTS' MOTIONS TO DISMISS

1 I, Ryan S. Hilbert, do hereby declare and certify as follows:

2 1. I have personal knowledge of the following facts, and if called as a witness, could
3 and would competently testify thereto.

4 2. I am an attorney at law, duly licensed to practice before all the courts of the State
5 of California, and I am an associate with the law offices of Manatt, Phelps & Phillips, LLP,
6 attorneys of record for Plaintiffs Bernard Paul Parrish, Herbert Anthony Adderley, and Walter
7 Roberts III, on behalf of themselves and all others similarly situated (“Plaintiffs”), in the above-
8 entitled action.

9 3. Attached hereto as Exhibit 1 is a true and correct copy of Players Inc’s Responses
10 and Objections to Plaintiffs’ First Set of Requests for Admissions dated August 1, 2007.

11 4. Attached hereto as Exhibit 2 is a true and correct copy of the Declaration of Gene
12 Upshaw in Support of Defendant’s Motion for Sanctions dated April 3, 2007.

13 5. Attached hereto as Exhibit 3 is a true and correct copy of the “NFL PLAYERS
14 ASSOCIATION: Retired Player Group Licensing Authorization Form” signed by Herb Adderley
15 on November 22, 2002, and showing an expiration date of December 31, 2005. This document
16 was produced by Players Inc on August 1, 2007 in response to Plaintiffs’ First Set of Requests
17 for Production of Documents and Things.

18 6. Attached hereto as Exhibit 4 is a true and correct copy of the “NFL PLAYERS
19 ASSOCIATION: Retired Player Group Licensing Authorization Form” signed by Herb Adderley
20 on May 1, 2001, and showing an expiration date of December 31, 2003. This document was
21 produced by Players Inc on August 1, 2007 in response to Plaintiffs’ First Set of Requests for
22 Production of Documents and Things.

23 Pursuant to 28 U.S.C. § 1746, I declare under the penalty of perjury under the laws of the
24 United States of America that the foregoing is true and correct, and that I executed this
25 Declaration on August 9, 2007.

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/s/ Ryan S. Hilbert
Ryan S. Hilbert

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