

1 MANATT, PHELPS & PHILLIPS, LLP  
 2 RONALD S. KATZ (Bar No. CA 085713)  
 3 E-mail: rkatz@manatt.com  
 4 RYAN S. HILBERT (California Bar No. 210549)  
 5 E-mail: rhilbert@manatt.com  
 6 NOEL S. COHEN (California Bar No. 219645)  
 7 E-mail: ncohen@manatt.com  
 8 1001 Page Mill Road, Building 2  
 9 Palo Alto, CA 94304-1006  
 10 Telephone: (650) 812-1300  
 11 Facsimile: (650) 213-0260

12 McKOOL SMITH, P.C.  
 13 LEWIS T. LECLAIR (Bar No. CA 077136)  
 14 E-mail: lleclair@mckoolsmith.com  
 15 JILL ADLER (Bar No. CA 150783)  
 16 E-mail: jadler@mckoolsmith.com  
 17 300 Crescent Court, Suite 1500  
 18 Dallas, TX 75201  
 19 Telephone: (214) 978-4000  
 20 Facsimile: (214) 978-4044

21 Attorneys for Plaintiffs

22 UNITED STATES DISTRICT COURT  
 23 NORTHERN DISTRICT OF CALIFORNIA  
 24 SAN FRANCISCO DIVISION

25 CIVIL ACTION NO. C07 0943 WHA

26 BERNARD PAUL PARRISH, HERBERT  
 27 ANTHONY ADDERLEY, and WALTER  
 28 ROBERTS, III on behalf of themselves and  
 all others similarly situated,

Plaintiffs

vs.

**MISCELLANEOUS ADMINISTRATIVE  
 REQUEST TO FILE CERTAIN  
 CONFIDENTIAL MATERIALS UNDER  
 SEAL IN SUPPORT OF PLAINTIFFS'  
 THIRD AMENDED COMPLAINT;  
 DECLARATION OF RYAN S. HILBERT  
 IN SUPPORT THEREOF**

NATIONAL FOOTBALL LEAGUE  
 PLAYERS ASSOCIATION, a Virginia  
 corporation, and NATIONAL FOOTBALL  
 LEAGUE PLAYERS INCORPORATED  
 d/b/a PLAYERS INC, a Virginia  
 corporation,

Defendants.

1 Pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, Civil Local Rules 79-5(d)  
2 and 7-11, and the Court’s inherent authority over its own files and records, Plaintiffs file these  
3 documents in support of their Motion for Leave to File the Third Amended Complaint for Breach  
4 of Contract, Breach of Fiduciary Duty, an Accounting and Violation of California Business &  
5 Professions Code § 17200 (the Complaint is being filed as an attachment to Plaintiff’s Motion For  
6 Leave to File same).

7 Specifically, Plaintiffs request that the Court seal the following documents:

- 8 (A) **An unredacted version of Motion for Leave to File the Third Amended**  
9 **Complaint;**
- 10 (B) **An unredacted version of the Third Amended Complaint (filed as an**  
11 **attachment to the Motion for Leave to File);**
- 12 (C) **Exhibits D, F, G, I, J, and O to the Third Amended Complaint (filed as**  
13 **an attachment to the Motion for Leave to File); and.**
- 14 (D) **An unredacted version of the Declaration of Ronald S. Katz in Support**  
15 **of the Motion for Leave to File the Third Amended Complaint.**

16 This motion is made on the grounds that the above documents contain documents,  
17 testimony and information that has been designated as “Highly Confidential – Attorneys Eyes  
18 Only” by Defendants. For this reason, Plaintiffs submit the above-referenced documents under  
19 seal. Plaintiffs respectfully request that the Court authorize the filing of the documents under seal  
20 pursuant to designation by Defendants.

21  
22  
23  
24  
25  
26  
27  
28

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Dated: September 27, 2007

MANATT, PHELPS & PHILLIPS, LLP

By: /s/ Ryan S. Hilbert  
Ronald S. Katz (SBN 085713)  
Ryan S. Hilbert (SBN 210549)  
Noel S. Cohen (SBN 219645)  
MANATT, PHELPS & PHILLIPS, LLP  
1001 Page Mill Road, Building 2  
Palo Alto, CA 94304-1006  
Telephone: (650) 812-1300  
Facsimile: (650) 213-0260  
*Attorneys for Plaintiffs*

Lewis T. LeClair, Esq.  
Jill Adler, Esq.  
McKOOL SMITH, P.C.  
300 Crescent Court  
Suite 1500  
Dallas, TX 75201  
214-978-4984  
214-978-4044 (fax)

**OF COUNSEL**

Samuel A. Mutch Esq.  
SAMUEL A. MUTCH, P.A.  
2114 N.W. 40th Terrace, Suite A-1  
Gainesville, FL 32605  
Telephone: (352) 378-5599  
Facsimile: (352) 378-3388