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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.

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

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

Defendants.

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I, Ryan S. Hilbert, declare as follows:

1. I am an associate with Manatt, Phelps & Phillips, LLP, attorneys of record for Plaintiffs Bernard Paul Parrish, Herbert Anthony Adderley, and Walter Roberts, III, in the above-captioned matter. The facts below are true and correct and within my own personal knowledge. If called on to testify to them, I could and would competently do so.

2. This Declaration pertains to the Plaintiffs’ Motion for Leave to File Third Amended Complaint, the Third Amended Complaint for Breach of Contract, Breach of Fiduciary Duty, an Accounting and Violation of California Business & Professions Code § 17200, and exhibits D, F, G, I, J, and O attached thereto and filed concurrently with the Motion for Leave to File same, and the Declaration of Ronald S. Katz in Support of the Motion to File Third Amended Complaint filed concurrently therewith.

3. The above-referenced documents, information and exhibits have been specifically designated by Defendants as “Highly Confidential – Attorneys Eyes Only.”

4. Plaintiffs have narrowly tailored their request to file the above information and documents under seal in that they are only seeking to seal what Defendants have designated as “Highly Confidential – Attorneys Eyes Only” information, testimony and/or documents pursuant to the parties’ Stipulated Protective Order.

I declare under penalty of perjury under the laws of the United States of America and the State of California that the foregoing is true and correct and that this declaration was executed on September 27, 2007.

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/s/ Ryan S. Hilbert  
Ryan S. Hilbert