

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.

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

Defendants.

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

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

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' 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 in support thereof.

3. The above-referenced documents, information and exhibits contain information that has been specifically designated by Defendants as "Highly Confidential – Attorneys Eyes Only" or "Confidential."

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" or "Confidential" 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 November 15, 2007.

/s/ Ryan S. Hilbert
Ryan S. Hilbert