

Dewey & LeBoeuf LLP
1950 University Avenue
East Palo Alto, California 94303-2225

1 Mark Malin (Bar No. 199757)
mmalin@dl.com
2 DEWEY & LEBOEUF LLP
1950 University Avenue, Suite 500
3 East Palo Alto, CA 94303
Tel: (650) 845-7000; Fax: (650) 845-7333

4 Jeffrey L. Kessler (*pro hac vice*)
jkessler@dl.com
5 David G. Feher (*pro hac vice*)
dfeher@dl.com
6 Eamon O'Kelly (*pro hac vice*)
eokelly@dl.com
7 DEWEY & LEBOEUF LLP
8 1301 Avenue of the Americas
New York, NY 10019
9 Tel: (212) 259-8000; Fax: (212) 259-6333

10 Kenneth L. Steinthal (*pro hac vice*)
kenneth.steinthal@weil.com
11 Claire E. Goldstein (Bar No. 237979)
claire.goldstein@weil.com
12 WEIL, GOTSHAL & MANGES LLP
201 Redwood Shores Parkway
13 Redwood Shores, CA 94065
Tel: (650) 802-3000; Fax: (650) 802-3100

14 Bruce S. Meyer (*pro hac vice*)
bruce.meyer@weil.com
15 WEIL, GOTSHAL & MANGES LLP
16 767 Fifth Avenue
New York, NY 10153
17 Tel: (212) 310-8000; Fax: (212) 310-8007

18 Attorneys for Defendants National Football League Players Association
and National Football League Players Incorporated d/b/a Players Inc

19
20 **UNITED STATES DISTRICT COURT**
NORTHERN DISTRICT OF CALIFORNIA
21 **SAN FRANCISCO DIVISION**

22 BERNARD PAUL PARRISH, HERBERT
23 ANTHONY ADDERLEY, WALTER
ROBERTS III,

24 Plaintiffs,

25 v.

26 NATIONAL FOOTBALL LEAGUE
27 PLAYERS ASSOCIATION and NATIONAL
FOOTBALL LEAGUE PLAYERS
INCORPORATED d/b/a/ PLAYERS INC,

28 Defendants.

Case No. C 07 0943 WHA

**DECLARATION OF JOEL LINZNER
IN SUPPORT OF DEFENDANTS'
MISCELLANEOUS
ADMINISTRATIVE MOTION TO
FILE UNDER SEAL CERTAIN
CONFIDENTIAL MATERIALS
FILED BY PLAINTIFFS**

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Bernard Parrish, et al.,

Plaintiffs,

Case No. C 07 0943 WHA

v.

National Football League Players Association,
et al.,

Defendants.

DECLARATION OF JOEL LINZNER

I, Joel Linzner, declare as follows:

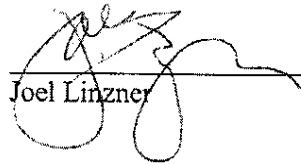
1. I am Executive Vice President of Business and Legal Affairs of Electronic Arts Inc. ("EA") and have held that position since April 2004. From October 2002 to April 2004, I was Senior Vice President of Worldwide Business Affairs. From July 1999 to October 2002, I was Vice President of Worldwide Business Affairs at EA. Since July 1999, I have been the EA person principally responsible for negotiations with National Football League Players Incorporated d/b/a Players Inc ("Players Inc") regarding player group licensing. I am over twenty-one years of age and have personal knowledge of each of the facts stated herein. If called upon to testify, I could and would testify completely thereto.

2. I understand that plaintiffs in this action have attached to their Third Amended Complaint certain licensing contracts between EA and Players Inc, specifically the contracts effective as of March 1, 2004 and March 1, 2005 ("EA Licensing Contracts").

3. The EA Licensing Contracts are filled with extremely sensitive confidential business information, including specific price terms, royalty rates, and other individually negotiated terms and conditions of the contracts. This information is not a

matter of public record, and would cause substantial competitive injury to EA if it were publicly disclosed. Indeed, I believe that public disclosure of this information would harm competition by divulging to EA's and Players Inc's competitors the confidential price and other terms that EA and Players Inc negotiated in these contracts. The harm to EA and others from public disclosure of these documents would be severe and immediate.

I declare under the 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 in executed in Redwood City, California on November 21, 2007.


Joel Linzner