

Exhibit A
to the
Declaration of Ryan S. Hilbert In Support of
Plaintiffs' Miscellaneous Administrative Request
to Re-Set Dates and Deadlines

November 21, 2007

Client-Matter: 29749-060

VIA E-MAIL

Eamon O'Kelly, Esq.
Dewey & LeBoeuf LLP
1301 Avenue of the Americas
New York, NY 10019-6092

**Re: Bernard Paul Parrish, et al. v. National Football League Players Association
and Players Inc, Case No. C07-0943 WHA**

Dear Eamon:

I write regarding the Court's November 14 Order, which, among other things, lifted the stay on discovery. As you will recall, at the time of the stay, there were several outstanding matters between the parties, which are listed below. The purpose of this letter is to propose a time next week in which we can discuss the status of those matters in an effort to meet the Court's deadlines.

(1) Scheduling Order: On June 14, 2007, the Court issued a detailed scheduling order that included, among other things, the briefing schedule for Plaintiffs' Motion for Class Certification. Because certain of those dates have now passed, we believe that it is necessary to ask the Court to issue a new scheduling order. Following for discussion purposes is a list of Plaintiffs' proposed new dates. Provided the parties can agree on an appropriate schedule, we believe that it makes sense to submit the schedule to the Court in the form of a joint stipulation:

Current Dates	Plaintiffs' Proposed New Dates
<u>October 18, 2007</u> : Last day to file motion for certification	<u>February 7, 2007</u> : Last day to file motion for certification
<u>December 6, 2007</u> : Hearing on certification motion	<u>March 27, 2007</u> : Hearing on certification motion
<u>May 9, 2008</u> : Non-expert discovery cut-off	<u>May 23, 2008</u> : Non-expert discovery cut-off (per Court's Nov. 14 Order)

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<u>May 9, 2008</u> : Last day to file expert reports	<u>May 23, 2008</u> : Last day to file expert reports
<u>May 30, 2008</u> : Last day to file replies in support of expert reports	<u>June 13, 2008</u> : Last day to file replies in support of expert reports
<u>June 26, 2008</u> : Last day to file dispositive motions	<u>July 17, 2008</u> : Last day to file dispositive motions
<u>September 8, 2008 @ 2:00 pm</u> : Final Pretrial Conference	<u>September 8, 2008 @ 2:00 pm</u> : Final Pretrial Conference
<u>September 22, 2008 @ 7:30 am</u> : Jury trial commences	<u>September 22, 2008 @ 7:30 am</u> : Jury trial commences

(2) Depositions: At the time of the stay, the parties had either confirmed or were in the process of finalizing the details of several depositions, including but not limited to the depositions of Gene Upshaw, Howard Skall, Bernie Parrish and Herb Adderley. Now that the stay has been lifted, we propose re-visiting this issue in order to determine which depositions should go forward and when.

(3) Document Production: At the time of the stay, Plaintiffs were prepared to produce documents responsive to Defendants' First Set of Document Requests. Plaintiffs remain willing to do so in relatively short order. As we understand it, Defendants were also in the process of producing documents at the time of the stay, including e-mail communications. We would like to discuss when Defendants anticipate completing their production. In light of the Court's statements concerning the sufficiency of Mr. Adderley's breach of contract allegations, we believe that Plaintiffs are now entitled to discovery on Defendants' financial statements and expenditures (which the Court previously denied without prejudice). We would like to discuss this issue with you in more detail as well.

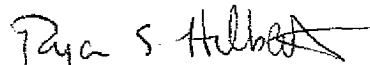
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Please let me know if you are available this Monday, November 26 at 2:00 pm PST to discuss the matters listed above. In the event this date and time do not work, please propose an alternative date and time on which you are available.

Very truly yours,



Ryan S. Hilbert
Manatt, Phelps & Phillips, LLP

cc: Ronald S. Katz, Esq.
David Greenspan, Esq.

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