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21 Attorneys for Plaintiffs

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

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

Plaintiffs

vs.

29 NATIONAL FOOTBALL LEAGUE
 30 PLAYERS ASSOCIATION, a Virginia
 31 corporation, and NATIONAL FOOTBALL
 32 LEAGUE PLAYERS INCORPORATED
 33 d/b/a PLAYERS INC, a Virginia
 34 corporation,

Defendants.

CIVIL ACTION NO. C07 0943 WHA

**DECLARATION OF RONALD S. KATZ IN
 SUPPORT OF MOTION FOR CLASS
 CERTIFICATION**

Date: April 24, 2008
 Time: 8:00 a.m.
 Place: Courtroom 9, 19th Floor
 Judge: Hon. William H. Alsup

1 I, Ronald S. Katz, declare as follows:

2 1. I am a partner with Manatt, Phelps and Phillips, L.L.P., (“Manatt”) counsel of
3 record for Plaintiffs Herbert Adderley and Bernard Parrish in this matter. I have personal
4 knowledge of the matters stated herein.

5 2. Attached hereto as **Exhibit A** is a true and correct copy of a declaration (with
6 exhibits) I filed in this case on February 20, 2007 in support of Plaintiffs’ Motion for Interim
7 Class Counsel (the “February 20, 2007 Declaration”).

8 3. Since the time of my February 20, 2007 Declaration, I have had frequent
9 communications with Bernard Parrish and Herbert Adderley regarding this litigation. Messrs.
10 Parrish and Adderley have repeatedly communicated to me that they are very interested in this
11 litigation and wish to serve as named Plaintiffs. They also have participated in this case and
12 pursued their roles as class representatives with vigor.

13 4. I have reviewed every complaint in this action with Mr. Parrish and Mr. Adderley.
14 Mr. Parrish and Mr. Adderley have approved every complaint Plaintiffs have filed in this action.
15 In the case of the Third Amended Complaint (“TAC”), I was able to review with Messrs. Parrish
16 and Adderley only the public version of the TAC because Defendants had designated certain
17 materials as confidential as to the Plaintiffs pursuant to the Protective Order in this matter.

18 5. Since the time of my February 20, 2007 Declaration, I also have reviewed
19 countless documents from both the parties and third parties, engaged economic experts, and
20 conducted or attended several party and third-party depositions, including the depositions of Joel
21 Linzer of Electronic Arts, Glenn Eyrich (Defendants’ 30(b)(6) witness on financial and auditing
22 matters), Plaintiff Herbert Adderley, Gene Upshaw (Executive Director of the NFLPA and
23 Chairman of Players Inc.), and Margaret Parrish (the 30(b)(6) designee of Retired Professional
24 Football Players for Justice). I am currently scheduled to defend Mr. Parrish at his deposition on
25 March 13, 2008. I have also had many additional meetings with Messrs. Parrish and Adderley.

26 6. To date, Manatt has spent time worth hundreds of thousands of dollars in
27 representation of Plaintiffs in this action. Manatt is willing and able to expend whatever
28 resources (both financial and non-financial) are needed in the future, and to aggressively pursue

1 this action.

2 I declare under penalty of perjury and the laws of the United States that the foregoing is
3 true and correct and that this declaration was executed on March 13, 2008.

4 /s/Ronald S. Katz

5 Ronald S. Katz

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