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13
14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA
16 SAN FRANCISCO DIVISION

18 BERNARD PAUL PARRISH, and
19 HERBERT ANTHONY ADDERLEY, on
20 behalf of themselves and all others
similarly situated,

21 Plaintiffs

22 vs.

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

26 Defendants.
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CIVIL ACTION NO. C07 0943 WHA

**DECLARATION OF BERNARD PAUL
PARRISH 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

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I, Bernard Paul Parrish, declare and state as follows:

1. I am a party to this lawsuit and submit this declaration in support of Plaintiffs’ Motion for Class Certification. I have personal, first-hand knowledge of the matters stated herein, and, if called upon to do so, I could and would competently testify thereto.

2. I was a defensive back with the Cleveland Browns from 1959 through 1966. Since my retirement from the NFL, I have devoted considerable time to advocating for retired players’ rights, and was a pioneer of the National Football League Players Association (“NFLPA”). I am also the author of a best selling book, *They Call It A Game*, published in 1971, which advocated players rights. Although I am flattered to have been urged by N.Y. Times columnist William Rhoden to run for Executive Director of the NFLPA, I have not yet decided whether I will do that.

3. In 2005, I paid \$50 to the NFLPA to become a retired player member of that organization. During the time of my membership, PLAYERS INC never informed me that it was licensing retired player rights to licensees like EA and Topps, and that retired players could share in royalties by signing a GLA. I was also disappointed to learn, after joining the NFLPA and paying dues, that Mr. Upshaw did not believe that he represents me or other retired players.

4. I am interested in this litigation and wish to serve as a named plaintiff. I was the person that contacted Ronald Katz in October 2006 to represent me and similarly situated retired players. I also asked Herb Adderley and Walter Roberts to consider joining this lawsuit. I understand that my claims arise from the NFLPA’s substandard representation of retired players such as myself.

5. Since January 2006, I have had frequent communications with counsel and various members of the proposed class regarding this litigation. I have reviewed and approved every complaint filed in this action. In the case of the Third Amended Complaint (“TAC”), I was only able to review the public (redacted) version, because Defendants have designated certain materials as confidential as to me pursuant to the Protective Order in this matter. I have also personally responded to discovery and am scheduled to be deposed on March 13, 2008.

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

/s/ Bernard Paul Parrish
Bernard Paul Parrish

Filer's Attestation: Pursuant to General Order No. 45, Section X(B) regarding signatures, Ronald S. Katz hereby attests that concurrence in the filing of this document has been obtained.

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