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12 Attorneys for Plaintiffs

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

16 CIVIL ACTION NO. C07 0943 WHA

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

19 Plaintiffs

20 vs.

**DECLARATION OF RYAN S. HILBERT
 IN SUPPORT OF PLAINTIFFS’
 MISCELLANEOUS ADMINISTRATIVE
 REQUEST TO FILE CERTAIN
 CONFIDENTIAL MATERIALS UNDER
 SEAL PURSUANT TO MARCH 31, 2008
 COURT ORDER**

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

26 Defendants.

1 I, Ryan S. Hilbert, declare as follows:

2 1. I am an associate with Manatt, Phelps & Phillips, LLP, attorneys of record for
3 Plaintiffs Bernard Paul Parrish and Herbert Anthony Adderley in the above-captioned matter.
4 The facts below are true and correct and within my own personal knowledge. If called on to
5 testify to them, I could and would competently do so.

6 2. This Declaration pertains to Plaintiffs' Miscellaneous Request to File Certain
7 Documents Under Seal Pursuant to March 31, 2008 Court Order.

8 3. Exhibit 35 to the Greenspan Declaration is the bank statements of third-party
9 Retired Football Players for Justice ("RFPFJ"). These statements are non-public and show all of
10 the deposits, withdrawals and debits transacted by RFPFJ from its inception through February
11 2008.

12 4. Exhibit 29 includes excerpts from the deposition of Margaret Parrish, the RFPFJ's
13 designated 30(b)(6) witness. These excerpts are among those limited portions of deposition
14 testimony RFPFJ designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only."
15 These excerpts discuss at length and in detail the nature of most, if not all, of the transactions
16 identified in third-party RFPFJ's confidential bank statements.

17 5. Exhibits 14, 16, 22, 23, 26 and 33 are e-mail communications sent to and from
18 various third parties, none of whom are parties and all of whom have no direct involvement in
19 this case.

20 6. Exhibits 16 and 23 are e-mail communications containing the private and personal
21 comments of a retired NFL player who is not a party to this case and who does not fall into either
22 of Plaintiffs' two proposed classes.

23 7. Exhibits 14, 22 and 26 contain both the private and personal comments of other
24 retired NFL players who are not parties to this case, as well as information concerning the
25 selection of third-party RFPFJ's officers and its Bylaws.

26 8. Exhibit 33 is an e-mail sent by Bernie Parrish to a number of recipients, many of
27 whom can be identified by their e-mail address and many of which appear to be owned and used
28 by well-known former NFL players. Public disclosure of these private, personally-controlled e-

1 mail addresses could subject those players to unwanted and harassing e-mail messages from
2 members of the public.

3 9. Plaintiffs have narrowly tailored their request by seeking to file only the above
4 documents under seal, and not Exhibits 1, 10, 13, 21 and 32.

5 I declare under penalty of perjury under the laws of the United States of America and the
6 State of California that the foregoing is true and correct and that this declaration was executed on
7 April 2, 2008.

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/s/ Ryan S. Hilbert

Ryan S. Hilbert