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26 UNITED STATES DISTRICT COURT  
 27 NORTHERN DISTRICT OF CALIFORNIA  
 28 SAN FRANCISCO DIVISION

29 BERNARD PAUL PARRISH, and  
 30 HERBERT ANTHONY ADDERLEY, on  
 31 behalf of themselves and all others  
 32 similarly situated,

33 Plaintiffs

34 vs.

35 NATIONAL FOOTBALL LEAGUE  
 36 PLAYERS ASSOCIATION, a Virginia  
 37 corporation, and NATIONAL FOOTBALL  
 38 LEAGUE PLAYERS INCORPORATED  
 39 d/b/a PLAYERS INC, a Virginia  
 40 corporation,

41 Defendants.

CIVIL ACTION NO. C07 0943 WHA

**STIPULATION AND [PROPOSED] ORDER  
 REVISING CLASS DEFINITION AND  
 CLASS NOTICE**

1 Plaintiffs Bernard Paul Parrish, Herbert Anthony Adderley, and Walter Roberts III, on  
2 behalf of themselves and all others similarly situated, (collectively, "Plaintiffs"), and Defendants  
3 National Football League Players Association ("NFLPA") and National Football League Players  
4 Incorporated d/b/a Players Inc ("Players Inc") (collectively, "Defendants") hereby file this Joint  
5 Stipulation to revise the definition of the class certified in the Court's April 29, 2008 Order  
6 Granting in Part and Denying in Part Plaintiffs' Motion for Class Certification and the Class  
7 Notice.

8 **JOINT STIPULATION**

9 WHEREAS, in its Order dated April 29, 2008 Granting in Part and Denying in Part  
10 Plaintiffs' Motion for Class Certification, this Court certified a class comprised of "[a]ll retired  
11 NFL players who signed GLAs with the NFLPA that were in effect between February 13, 2003  
12 and February 14, 2007";

13 WHEREAS, Defendants have objected to this class definition on the grounds that it is  
14 broader than the class definition proposed by Plaintiffs because it is not limited to GLAs  
15 containing language identical or substantially similar to that found in the Adderley GLAs;

16 IT IS HEREBY STIPULATED BY AND BETWEEN THE PARTIES HERETO, through  
17 their respective counsel, that the class definition should be revised to the following:

18  
19 All retired NFL players who executed a group licensing authorization form ("GLA") with  
20 the NFLPA that was in effect at any time between February 14, 2003 and February 14,  
21 2007 and which contains the following language: "[T]he moneys generated by such  
22 licensing of retired player group rights will be divided between the player and an escrow  
23 account for all eligible NFLPA members who have signed a group licensing authorization  
24 form."

25 The parties also request that the Court approve a revised Class Notice reflecting this change,  
26 attached hereto as Exhibit "1".  
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Dated: June 6, 2008

MANATT, PHELPS & PHILLIPS, LLP

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Dated: June 6, 2008

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*Attorneys for Defendants*

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

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**[PROPOSED] ORDER**

Pursuant to the Joint Stipulation above, it is hereby ORDERED that the class definition certified in the April 29, 2008 Order Granting in Part and Denying in Part Plaintiffs’ Motion for Class Certification is revised as follows:

All retired NFL players who executed a group licensing authorization form (“GLA”) with the NFLPA that was in effect at any time between February 14, 2003 and February 14, 2007 and which contains the following language: “[T]he moneys generated by such licensing of retired player group rights will be divided between the player and an escrow account for all eligible NFLPA members who have signed a group licensing authorization form.”

IT IS FURTHER ORDERED that the parties form of Class Notice attached as Exhibit 1 is approved.

IT IS SO ORDERED.

Dated: \_\_\_\_\_

\_\_\_\_\_  
HON. WILLIAM H. ALSUP  
United States District Court Judge