

Exhibit P

Dewey & LeBoeuf LLP
One Embarcadero Center, Suite 400
San Francisco, California 94111

1 Todd Padnos (Bar No. 208202)
tpadnos@dl.com
2 DEWEY & LEBOEUF LLP
One Embarcadero Center, Suite 400
3 San Francisco, CA 94111
Tel: (415) 951-1100; Fax: (415) 951-1180
4

5 Jeffrey L. Kessler (*pro hac vice*)
jkessler@dl.com
David G. Feher (*pro hac vice*)
6 *dfeher@dl.com*
David Greenspan (*pro hac vice*)
7 *dgreenspan@dl.com*
DEWEY & LEBOEUF LLP
8 1301 Avenue of the Americas
New York, NY 10019
9 Tel: (212) 259-8000; Fax: (212) 259-6333

10 Kenneth L. Steinthal (*pro hac vice*)
kenneth.steinthal@weil.com
11 WEIL, GOTSHAL & MANGES LLP
201 Redwood Shores Parkway
12 Redwood Shores, CA 94065
Tel: (650) 802-3000; Fax: (650) 802-3100
13

Bruce S. Meyer (*pro hac vice*)
14 *bruce.meyer@weil.com*
WEIL, GOTSHAL & MANGES LLP
15 767 Fifth Avenue
New York, NY 10153
16 Tel: (212) 310-8000; Fax: (212) 310-8007

17 Attorneys for Defendants National Football League Players Association
and National Football League Players Incorporated d/b/a Players Inc
18

19 **UNITED STATES DISTRICT COURT**
20 **NORTHERN DISTRICT OF CALIFORNIA - SAN FRANCISCO DIVISION**

21 BERNARD PAUL PARRISH, HERBERT
ANTHONY ADDERLEY, WALTER
22 ROBERTS III,

23 Plaintiffs,

24 v.

25 NATIONAL FOOTBALL LEAGUE
PLAYERS ASSOCIATION and NATIONAL
26 FOOTBALL LEAGUE PLAYERS
INCORPORATED d/b/a/ PLAYERS INC,

27 Defendants.
28

Case No. C 07 0943 WHA

Honorable William H. Alsup

**DEFENDANTS' SUPPLEMENTAL
DISCLOSURES PURSUANT TO
FED. R. CIV. P. 26(a)(1)**

1 In response to Plaintiffs' May 15, 2008 request that Defendants supplement their
2 Supplemental Initial Disclosures dated February 19, 2008, and May 9, 2008, Defendants
3 National Football League Players Association ("NFLPA") and National Football League Players
4 Incorporated d/b/a Players Inc ("Players Inc") hereby supplement those prior disclosures to
5 plaintiffs Bernard Paul Parrish, Herbert Anthony Adderley, and Walter Roberts III ("Plaintiffs").
6 Defendants note that most of the information described herein has been previously disclosed to
7 Plaintiffs through written correspondence, deposition testimony, and other means.

8 Defendants reserve their right to continue their investigation and discovery of
9 facts, witnesses and documents, which may reveal additional information about the issues in this
10 case. Accordingly, these Supplemental Disclosures are made without prejudice to Defendants'
11 right to further amend, revise or supplement them at a later date.

12 These Supplemental Disclosures are subject to all appropriate objections that
13 would require the exclusion of any information contained herein if introduced as evidence in
14 court. All such objections are reserved and may be interposed at the time of trial. No admissions
15 of any nature whatsoever are implied or should be inferred.

16 SUPPLEMENTAL DISCLOSURES

17 I. Potential Witnesses (Rule 26(a)(1)(A))

18 The following individuals are officers or employees of licensees that have done
19 business with Players Inc and/or the NFLPA, and are likely to have discoverable information on
20 the subject of their respective licensing agreements with Players Inc and/or the NFLPA.

- 21 • Steve Byrd, Executive Vice President of Sales & Marketing, STATS, Inc.,
22 2775 Shermer Road, Northbrook, IL 60062, 847-583-2100;
- 23 • Linda Castillon, Vice President of Licensing, Fathead, LLC, 1136 Saint
24 Gregory Street, Suite 135, Cincinnati, OH 45202, 513-706-9449;
- 25 • Christine Finch, President, Todd McFarlane Productions, 1711 W.
26 Greentree Drive, Suite 208, Tempe, AZ 85284, 480-491-7070;
- 27 • Warren Friss, Vice President and Entertainment General Manager, Topps
28 Company, One Whitehall Street, New York, NY 10004, 212-376-0300;

- 1 • Adam Zucker, Director of Sports Licensing, Topps Company, One
2 Whitehall Street, New York, NY 10004, 212-376-0300; and
3 • Adam Sullins, Vice President and General Counsel, The Upper Deck
4 Company, 5909 Sea Otter Place, Carlsbad, CA 92010-6621, 760-929-6500.

5 The following individuals are retired NFL players and are likely to have
6 discoverable information related to the claims asserted by Adderley in this action, including but
7 not limited to licensing arrangements involving retired players, the NFLPA and/or Players Inc,
8 and licensees.

- 9 • Dan Goich, P.O. Box 19068, Las Vegas, NV 89132, 702-733-0797
10 • Mike McBath, 5044 Sail Wind Circle, Orlando, FL 32810, 407-290-3011
11 • Brig Owens, 1230 31st St. N.W., Washington, DC 20007, 202-625-3330

12 The following individuals are retired NFL players and are likely to have
13 discoverable information related to the claims asserted by Parrish in this action.

- 14 • Leonard Wheeler, 10300 Otterdale Ct., Charlotte, NC 28277, 704-540-
15 9860
16 • Eric Hipple, 7155 Driftwood Dr., Fenton, MI 48430, 810-629-3172

17 Joseph Nahra is a current employee of Defendant National Football League
18 Players Association and has already been deposed by Plaintiffs in connection with this action.
19 Mr. Nahra has discoverable information with respect to those subjects testified to at his
20 deposition, including but not limited to information regarding Defendants' licensing agreements
21 and practices, and regarding Group Licensing Authorization forms. Address information for Mr.
22 Nahra is not provided because he may only be contacted through the undersigned counsel.

23 Richard Berthelsen is a current employee of Defendant National Football League
24 Players Association and has already been deposed by Plaintiffs in connection with this action and
25 was previously disclosed by Plaintiffs in their June 7, 2007 Initial Disclosures. Mr. Berthelsen
26 has discoverable information with respect to those subjects testified to at his deposition,
27 including but not limited to NFLPA decisionmaking concerning licensing payments to active
28

Dewey & LeBoeuf LLP
One Embarcadero Center, Suite 400
San Francisco, California 94111

1 players. Address information for Mr. Berthelsen is not provided because he may only be
2 contacted through the undersigned counsel.

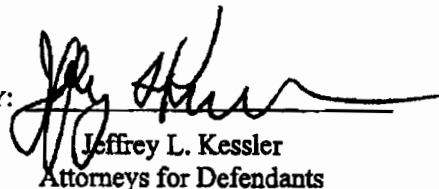
3 Steve Saxon, of the Groom Law Group, is outside counsel to Defendants, and is
4 likely to have discoverable information regarding the relationship between the NFLPA and
5 Players Inc as to licensing and related matters, including the agreements between the NFLPA
6 and Players Inc dated May 5, 1994, March 1, 2000, and February 28, 2006. Address information
7 for Mr. Saxon is not provided because he may only be contacted through the undersigned
8 counsel.

9 Glenn Eyrich, of the Calibre CPA Group PLLC, is an outside accountant to
10 Defendants, and has already been deposed by Plaintiffs in connection with this action. Mr.
11 Eyrich has discoverable information with respect to those subjects testified to at his deposition,
12 including accounting for monies from Defendants' third-party license agreements, the allocation
13 of funds between the NFLPA and Players Inc, and the calculation of the active player royalty
14 pool. Address information is not provided for Mr. Eyrich because he may only be contacted
15 through the undersigned counsel.

16 Date: May 20, 2008

DEWEY LEBOEUF LLP

17
18
19 BY:



Jeffrey L. Kessler
Attorneys for Defendants