

# Exhibit C

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

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

23 Plaintiffs,

24 v.

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

27 Defendants.

Case No. C 07 0943 WHA

Honorable William H. Alsup

**INITIAL DISCLOSURES OF  
DEFENDANTS NFLPA AND  
PLAYERS INC PURSUANT TO  
FED. R. CIV. P. 26(a)(1)**

1 Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, defendants  
2 National Football League Players Association and National Football League Players  
3 Incorporated d/b/a Players Inc (“Defendants”), hereby make the following initial disclosures to  
4 plaintiffs Bernard Paul Parrish, Herbert Anthony Adderley, and Walter Roberts III (“Plaintiffs”).

5 These disclosures are based upon information reasonably known to Defendants as  
6 of the date hereof. Defendants have not yet completed their investigation of the facts relating to  
7 this action, has not yet interviewed all witnesses in this action, and has not yet reviewed all  
8 documents that may be relevant to this action. Accordingly, these initial disclosures are made  
9 without prejudice to Defendants’ right to amend, revise or supplement these initial disclosures at  
10 a later date.

11 These initial disclosures are subject to all appropriate objections that would  
12 require the exclusion of any information contained herein if introduced as evidence in court. All  
13 such objections are reserved and may be interposed at the time of trial. No admissions of any  
14 nature whatsoever are implied or should be inferred. Nothing herein should be construed as an  
15 admission or acceptance by Defendants with respect to the admissibility or relevance of any  
16 document or fact referenced in these initial disclosures.

17 Defendants reserve their right to continue their investigation and discovery of  
18 facts, witnesses and documents, which may reveal additional information about the issues in this  
19 case. Defendants reserve the right at the time of trial to produce, refer to and offer into evidence  
20 any additional documents, facts, and evidence from any source and testimony from any witness  
21 which may be ascertained through their continuing discovery and trial preparation,  
22 notwithstanding the reference to documents and information in these initial disclosures.

23 **INITIAL DISCLOSURES**

24 **I. Potential Witnesses (Rule 26(a)(1)(A))**

25 Set forth below are the names of individuals likely to have discoverable  
26 information that Defendants may use to support their defenses. Defendants reserve the right to  
27 identify additional witnesses as discovery progresses.  
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1                   The following individuals are current employees of Defendant Players Inc and  
2 may be contacted through the undersigned counsel:

- 3 1. Pam Adolph
- 4 2. Dee Becker
- 5 3. Karen Bush
- 6 4. Andre Collins
- 7 5. Andrew Feffer
- 8 6. Josh Goodstadt
- 9 7. Angela Manolakas
- 10 8. Muneer Moore
- 11 9. Corrine Murphy
- 12 10. Dawn Ridley
- 13 11. Dexter Santos
- 14 12. Gene Upshaw

15                   The individuals identified below are former employees of Defendant Players Inc  
16 and may be contacted through the undersigned counsel:

- 17 1. Doug Allen
- 18 2. Pat Allen
- 19 3. Lashun Lawson
- 20 4. Howard Skall
- 21 5. David Suber
- 22 6. Clay Walker
- 23 7. Seth Wyman

24                   The individuals identified below are third party potential witnesses:

- 25 1. Trace Armstrong
- 26 2. Jason Brinner, Vice President, MBI Inc./Danbury Mint
- 27 3. Tim Brown
- 28

- 1 4. Ben Ecklar, Senior Brand Manager, Football, Donruss Playoff LLC
- 2 5. Kenny Gamble, Senior Director of Merchandising - NFL, Reebok International
- 3 6. Eddie George
- 4 7. Kevin Greene
- 5 8. Willie Lanier
- 6 9. Joel Linzner, Executive Vice President, Legal & Business Affairs, Electronic Arts, Inc.
- 7 10. Brian Mitchell
- 8 11. Scott Prusha, Director of Marketing, Donruss Playoff LLC
- 9 12. Todd Sitrin, Vice President Sports Marketing, Electronic Arts, Inc.
- 10 13. Herschel Walker

11 **II. Documents (Rule 26(a)(1)(B))**

12 Defendants have in their possession, custody and control the following categories  
13 of documents that they may use to support their defenses:

14 **Category**

- 15 • Documents relating to and including agreements with retired players regarding  
16 marketing and licensing of retired players' names, likenesses, and/or other intellectual  
17 property.
- 18 • Documents relating to and including agreements with sponsors and licensees  
19 regarding marketing and licensing with respect to retired players.
- 20 • Documents relating to and including financial and accounting records regarding the  
21 marketing and licensing business with respect to retired players.
- 22 • Documents relating to the marketing, promotion, and licensing of retired players.

23 **III. Damages (Rule 26(a)(1)(C))**

24 Defendants do not currently claim any category of damages.

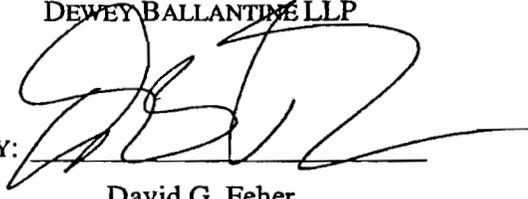
25 **IV. Insurance (Rule 26(a)(1)(D))**

26 In the event that a judgment were to be entered against Defendants in this lawsuit,  
27 the Illinois National Insurance Company might be liable to satisfy all or part of any such  
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1 judgment pursuant to Directors, Officers and Private Company Liability insurance policy number  
2 007420832. In addition, Axis Reinsurance Company might be able to satisfy part of any such  
3 judgment pursuant to excess liability policy number 713473/01/2007.  
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6 Date: June 29, 2007

DEWEY BALLANTINE LLP

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8  
9 BY: 

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