

**Exhibit B**  
**to the**  
**Declaration Of Laura M. Franco In Support Of**  
**July 30, 2008 Letter Brief**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT  
SAN FRANCISCO DIVISION

BERNARD PAUL PARRISH, HERBERT  
ANTHONY ADDERLEY, and WALTER  
ROBERTS, III, on behalf of  
themselves and all others  
similarly situated,

Plaintiffs,

vs.

Case No. C070943WHA

NATIONAL FOOTBALL LEAGUE  
PLAYERS ASSOCIATION, a  
Virginia corporation and  
NATIONAL FOOTBALL LEAGUE  
PLAYERS INCORPORATED d/b/a  
PLAYERS INC., a Virginia  
corporation,

Defendants.

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DEPOSITION OF PATRICIA E. ALLEN  
LOS ANGELES, CALIFORNIA  
FEBRUARY 28, 2008

Reported by David D. Sanchez, CSR No. 5620

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1 A. No, I don't.

2 Q. Do you know why he left Players Inc.?

3 A. I don't remember exactly.

4 Q. And who is Seth Wyman?

5 A. Seth was also a manager in the player  
6 marketing department.

7 Q. As far as you're aware is Mr. Wyman still  
8 at Players Inc.?

9 A. No, he is not.

10 Q. Do you know where Mr. Wyman is employed  
11 today?

12 A. I do not.

13 Q. Do you know approximately when Mr. Wyman  
14 left Players Inc.?

15 A. It's been within the last 5 years. I don't  
16 remember exactly.

17 Q. And do you recall why he left Players Inc.?

18 A. I believe he and his wife were relocating  
19 to New England where his family lived.

20 Q. And do you know who Lashun Lawson is?

21 A. Yes.

22 Q. And who is Lashun Lawson?

23 A. She was the assistant VP of multimedia  
24 prior to Josh Goodstadt.

25 Q. And I assume then she is no longer with

1 Players Inc.; is that correct?

2 A. That's correct.

3 Q. Do you know who Brig Owens is?

4 A. Yes.

5 Q. Who is Brig Owens?

6 A. He is a former player, played with the  
7 Washington Redskins, currently a businessman in  
8 Washington DC.

9 Q. Do you know if he has ever been employed by  
10 Players Inc.?

11 A. No, he has not.

12 Q. Do you know if he has ever been employed by  
13 the NFLPA?

14 A. Yes, he has.

15 Q. And do you know how long he was employed by  
16 NFLPA?

17 A. No, I don't.

18 Q. Do you know what position he held at the  
19 NFLPA?

20 A. I don't remember.

21 Q. Do you know how long ago he left the NFLPA?

22 A. It's been over 20, 25 years ago.

23 MR. COHEN: Could you just repeat the last  
24 question and answer.

25 (Record read)

P A U L S O N

DECLARATION UNDER PENALTY OF PERJURY

I, Pat Allen, do hereby certify under penalty of perjury that I have read the foregoing transcript of my deposition taken on February 28, 2008; that I have made such corrections as appear noted herein in ink, initialed by me; that my testimony as contained herein, as corrected, is true and correct.

DATE this \_\_\_\_\_ day of \_\_\_\_\_ 2008,  
at \_\_\_\_\_, California.

\_\_\_\_\_  
Patricia E. Allen

**P A U L S O N**