Parrish et al v. National Football League Players Incorporated Doc. 350

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

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

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

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

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

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

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

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

Plaintiffs,

v.

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

Defendants.

Case No. C 07 0943 WHA

DECLARATION OF ROY TAUB IN SUPPORT OF DEFENDANTS' MISCELLANEOUS ADMINISTRATIVE MOTION TO FILE A SUPPLEMENTAL DECLARATION IN SUPPORT OF THEIR AUGUST 1, 2008 REPLY LETTER BRIEF

Dockets.Justia.com

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

DECLARATION OF ROY TAUB

I, Roy Taub, hereby declare as follows:

1. I am an attorney with Dewey & LeBoeuf LLP, attorneys for Defendants National Football League Players Association ("NFLPA") and National Football League Players Incorporated d/b/a Players Inc ("Players Inc") in this action. I am a member of the bar of the State of New York and am admitted to practice before this Court *pro hac vice*. I make this Declaration in support of Defendants' Miscellaneous Administrative Motion to File a Supplemental Memorandum in Support of Their August 1, 2008 Reply Letter Brief ("Motion"). I have personal knowledge of each of the facts stated herein, and if called to testify, could and would testify completely hereto.

2. On Friday, August 1, 2008, Defendants submitted their August 1, 2008 Reply Letter Brief. On that same day, Plaintiffs filed a miscellaneous administrative request for leave to file a proposed supplemental declaration concerning the parties' agreement on pre-statute of limitation documents.

3. To provide the full context regarding the parties' agreement on pre-statute of limitations documents and to correct any mistaken assertions in Plaintiffs' proposed supplemental declaration, Defendants submit their Miscellaneous Administrative Motion for Leave to File a Supplemental Declaration in Support of Their August 1, 2008 Reply Letter Brief.

4. Earlier today my colleague Jason Clark and I attempted to contact counsel for Plaintiffs by telephone to seek a stipulation to file the proposed supplemental declaration. We were unable to speak with Laura Franco or Ryan Hilbert (with whom we left voicemail messages) or Ron Katz, whose secretary informed us that he is currently out of the country.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: August 4, 2008

/s/
Roy Taub