

EXHIBIT NN

to the Declaration of Ryan Hilbert
in Support of Plaintiffs' Opposition to
Defendants' Motion for Summary Judgment

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

BERNARD PAUL PARRISH,	*	
HERBERT ANTHONY ADDERLEY,	*	
WALTER ROBERTS, III, on	*	
behalf of themselves and	*	
all others similarly	*	
situated,	*	
Plaintiffs	*	
vs.	*	CASE NO.
NATIONAL FOOTBALL LEAGUE	*	C 07 00943 WHA
PLAYERS ASSOCIATION and	*	
NATIONAL FOOTBALL LEAGUE	*	
PLAYERS INCORPORATED d/b/a	*	
PLAYERS INC.,	*	
Defendants	*	

Videotape Deposition of RICHARD BERTHELSEN,
taken on Tuesday, May 13, 2008, beginning at
10:12 a.m., at Manatt, Phelps, Phillips, LLP,
700 12th Street, N.W., Washington, D.C., before
Linda Ann Crockett, a Notary Public.

Reported by: Linda A. Crockett

1 think your question was 2000 through 2006?

2 Q. 2003 through 2006.

3 A. Yes. My familiarity occurred because
4 of that case and I think that case was 2004.

5 Q. Were you aware that the retired player
6 GLA provided for a sharing of revenue between
7 the player and an escrow account; were you
8 aware of that?

9 MR. FEHER: Objection.

10 A. I became aware of it because of the
11 litigation I referred to.

12 Q. To your knowledge, was such an escrow
13 account ever created?

14 A. It was not.

15 Q. Do you know why it wasn't created?

16 A. Because the efforts to generate the
17 money for the retired players were
18 unsuccessful.

19 Q. Who was responsible for the, quote,
20 efforts to generate the money for retired
21 players, closed quote?

22 A. PLAYERS INC.

23 Q. And did anyone ever report to you the
24 reasons for the failure?

25 MR. FEHER: Objection.

1 STATE OF MARYLAND
2 COUNTY OF BALTIMORE

3 I, Linda A. Crockett, a Notary Public
4 of the State of Maryland, do hereby certify
5 that the within named, RICHARD BERTHELSEN, was
6 and after having been duly sworn by me, was
interrogated by counsel.

7 I further certify that the examination
8 was recorded stenographically by me, and this
transcript is a true record of the proceedings.

9 I further certify that the
10 stipulations made herein were entered into by
counsel in my presence.

11 I further certify that I am not of
12 counsel to any of the parties, nor an employee
13 of counsel, nor related to any of the parties,
nor in any way interested in the outcome of
this action.

14 As witness my hand and notarial seal
15 this 23rd day of May, 2008.
16 My commission expires: December 1, 2008

17 _____
18 Notary Public
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