

EXHIBIT 7

Case No. C 07 0943 WHA

Parrish v. National Football League Players Association, et al.

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.

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

Reported by David D. Sanchez, CSR No. 5620

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S
H

SAN DIEGO

555 West Beech Street
First Floor
San Diego, California 92101

PH 619.239.4111
FX 619.239.4117

TEMECULA

40880 County Center Drive
Suite F
Temecula, California 92591

PH 951.296.2850
FX 951.296.2852

COSTA MESA

535 Anton Blvd.
Suite 300
Costa Mesa, California 92626

PH 714.668.0166
FX 714.708.0402

RIVERSIDE

3801 University Avenue
Suite 640
Riverside, California 92501

PH 951.784.1525
FX 951.784.9520

LOS ANGELES

11400 West Olympic Blvd
Suite 140
Los Angeles, California 90064

PH 310.473.9003
FX 310.473.9373

SAN FRANCISCO

44 Montgomery Street
Suite 1100
San Francisco, California 94104

PH 415.591.3333
FX 415.591.3335

FRESNO

191 East Barstow Avenue
Suite 100
Fresno, California 93710

PH 559.222.9922
FX 559.222.7922

BAKERSFIELD

5001 E. Commercenter Drive
Suite 170
Bakersfield, California 93309

PH 661.322.2202
FX 661.322.2242

SACRAMENTO

2151 River Plaza Drive
Suite 300
Sacramento, California 95833

PH 916.446.2777
FX 916.446.2777

PHOENIX, AZ

3550 North Central Expressway
Suite 102
Phoenix, Arizona 85018

PH 602.266.2221
FX 602.266.2201

LAS VEGAS

2801 S. Valley View
Suite 7
Las Vegas, Nevada 89102

PH 702.382.5876
FX 702.382.4374

ATLANTA, GA

101 Marietta Street
Suite 2700
Atlanta, Georgia 30303

PH 800.941.3727
FX 619.239.4117

NEW YORK, NY

305 Madison Avenue
Suite 449
New York, New York 10165

PH 800.941.3727
FX 619.239.4117

MINEOLA, NY

142 Willis Avenue
Mineola, New York 11501

PH 800.941.3727
FX 619.239.4117

BOSTON, MA

100 Franklin Street
Suite 200
Boston, MA 02110

PH 800.941.3727
FX 619.239.4117

1 Appearances:

2 For Plaintiffs:

3 Manatt, Phelps & Phillips, LLP

4 By: Noel S. Cohen, Esq.

5 1001 Page Mill Road, Building 2

6 Palo Alto, California 94304-1006

7

8 For Defendants National Football League Players

9 Association, etc.:

10 Dewey & LeBoeuf

11 By: David Feher, Esq.

12 1301 Avenue of the Americas

13 New York, New York 10019

14

15 Also Present: Mike Cooper, Videographer

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20 DEPOSITION OF PATRICIA E. ALLEN, taken at

21 11355 West Olympic Boulevard, Los Angeles,

22 California, on Thursday, February 28, 2008, at

23 8:56 a.m., before David D. Sanchez, Certified

24 Shorthand Reporter, in and for the State of

25 California.

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1 MR. FEHER: Objection.

2 BY MR. COHEN:

3 Q. Do you know if anyone at Players Inc. ever
4 went to a licensee and asked if they wanted to
5 license retired player rights?

6 A. Yeah. The staff did that all the time.

7 Q. But there was no one specific individual at
8 Players Inc. that was the person primarily
9 responsible for group licensing for retired
10 players?

11 A. No.

12 Q. Approximately how many people handled group
13 licensing for retired players at Players Inc.?

14 A. I'm not sure I understand what you mean by
15 "handled."

16 Q. Okay, let me ask you this.

17 There was, I believe you said 8 departments
18 at Players Inc.; is that correct?

19 A. Yes.

20 Q. And of those 8 departments, did all of them
21 handle retired player licensing issues or were
22 there just one or two that specifically dealt with
23 that issue?

24 MR. FEHER: Objection.

25 THE WITNESS: No, they did not all deal with

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1 royalty pool"?

2 MR. FEHER: Objection to form.

3 THE WITNESS: No.

4 BY MR. COHEN:

5 Q. Do you know if a retired player royalty
6 pool was ever created?

7 A. I don't believe it was, no.

8 Q. And in that first line it says "Now that
9 were selling retired player apparel, the INC cut of
10 royalties could be a little chunk of change."

11 Do you recall if Players Inc. obtained any
12 royalties based upon the selling of retired player
13 apparel?

14 A. I don't know if Players Inc. did. I can't
15 remember whether it all went to the player or -- I
16 don't remember.

17 Q. Are you familiar with Photo File, with
18 Players Inc. getting a small amount of money of
19 royalties through its agreement with Photo File?

20 MR. FEHER: Objection.

21 THE WITNESS: Could you repeat that, please.

22 BY MR. COHEN:

23 Q. Yeah.

24 Do you know, it says here "the main portion
25 was insignificant." I believe that's referring to

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1 there were GLAs that were signed for more than
2 2,900 retired NFL players?

3 MR. FEHER: Same objection.

4 THE WITNESS: I didn't. I was not aware of
5 the exact number, no.

6 BY MR. COHEN:

7 Q. Does that number seem accurate to you?

8 MR. FEHER: Objection.

9 THE WITNESS: I really can't speculate on that
10 because I wasn't involved in it, so I don't know.

11 BY MR. COHEN:

12 Q. It also says in the first sentence, it says
13 "Players Inc. before profit, licensing company of
14 the NFL Players Association, is constantly working
15 to develop retired players programs."

16 Do you see that?

17 A. Yes.

18 Q. Who at Players Inc. would be primarily
19 responsible for working to develop retired players
20 programs?

21 A. There wasn't anyone in particular.

22 Q. Do you view that statement as accurate?

23 A. Well, I think as a matter of the course of
24 our business, you know, on a regular basis, we were
25 always promoting the use of retired players to

1 licensees and prospective licensees and sponsors.

2 Q. How so?

3 A. Well, I think I answered that earlier. It
4 was something we made licensees and prospective
5 licensees aware of and, you know, make sure they
6 understood that we had the access to retired
7 players and we're constantly promoting using
8 retired players. They didn't always do it. But to
9 the extent they were interested we worked with
10 them. Our staff members worked with them to
11 develop the retired players programs.

12 Q. Have you ever seen a Players Inc. document
13 that was sent to a third party licensee that
14 addressed retired player programs?

15 MR. FEHER: Objection.

16 THE WITNESS: I don't recall specifically a
17 document.

18 BY MR. COHEN:

19 Q. Did you ever ask anyone at Players Inc. to
20 send any third party licensee information regarding
21 potential licensing with retired players?

22 A. I don't recall specifically.

23 Q. Being that the original GLA was drafted
24 prior to you being employed by NFLPA, do you have
25 any concept or do you know who came up with the

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REPORTER'S CERTIFICATION

I, David D. Sanchez, Certified Shorthand Reporter, in and for the State of California, do hereby certify:

That the foregoing witness was by me duly sworn; that the deposition was then taken before me at the time and place herein set forth; that the testimony and proceedings were reported stenographically by me and later transcribed into typewriting under my direction; that the foregoing is a true record of the testimony and proceedings taken at that time.

IN WITNESS WHEREOF, I have subscribed my name this 14th day of March, 2008.

CS/ David D. Sanchez

David D. Sanchez, CSR No. 5620

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