

EXHIBIT 8

Case No. C 07 0943 WHA

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

Certified Copy

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
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. C07 0943 WHA

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

Defendants.

VIDEOTAPED DEPOSITION OF JOEL LINZNER

SAN FRANCISCO, CALIFORNIA

FRIDAY, FEBRUARY 8, 2008

Reported by Quyen N. Do, RPR, CSR No. 12447

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1 10:40:13 A I don't believe I've ever even thought
2 10:40:15 about it.

3 10:40:16 MR. FEHER: Same objections.

4 10:40:17 BY MR. KATZ:

5 10:40:18 Q Okay, fine. Let me -- as I say, I
6 10:40:22 represent to you that is the NFLPA retired players
7 10:40:29 directory. Let me direct your attention to page 7
8 10:40:36 of this document, which is headed "NFLPA Retired
9 10:40:39 Players Licensing Programs," and it reads as
10 10:40:40 follows:

11 10:40:44 "PLAYERS INC, the for-profit licensing
12 10:40:47 company of the NFL Players Association, is
13 10:40:51 constantly working to develop retired
14 10:40:54 players programs. The NFLPA Retired
15 10:40:56 Players Department has obtained Group
16 10:41:00 Licensing Assignment agreements (GLAs)
17 10:41:03 from more than 2,900 retired NFL players,
18 10:41:06 and is in the process of building up our
19 10:41:09 list so that PLAYERS INC can provide more
20 10:41:11 opportunities to retirees."

21 10:41:16 Were you aware that the NFLPA obtained
22 10:41:19 GLAs from retired players?

23 10:41:22 A Again, I think I told you before that I
24 10:41:26 understood that PLAYERS INC was representing some
25 retired players, and they had gotten an

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1 10:41:32 authorization, whether it was through a GLA or some
2 10:41:35 other form of agreement, to represent those retired
3 10:41:37 players for purposes of merchandising licensing.

4 10:41:39 Q Okay. My question is more specific. Did
5 10:41:42 you have knowledge, at any time during this period
6 10:41:48 from 1999 to the present, that the Players
7 10:41:53 Association was obtaining documents called GLAs from
8 10:41:54 the retired players?

9 10:41:56 A I -- I think I just answered that. I said
10 10:42:00 I didn't know whether it was a GLA or some other
11 10:42:01 form of agreement --

12 10:42:01 Q Right.

13 10:42:04 A -- by which they could represent their
14 10:42:05 interest for merchandising licensing.

15 10:42:07 Q Right. I don't mean to quibble with you.
16 10:42:10 I just want to know, did you know it was a GLA?
17 10:42:12 And -- and I think what you're saying is, you're not
18 10:42:12 sure that it was --

19 10:42:14 A I -- I said it's -- it's either a -- a
20 10:42:18 form of GLA -- see, the difference with a GLA, as I
21 10:42:20 understood it, is, a GLA is group licensing
22 10:42:22 agreement. Our license with PLAYERS INC is a group
23 10:42:26 license. So I don't have the right to just use
24 10:42:28 Randy Moss would be -- we can use Randy Moss as part
25 of a large group of players, and I always understood

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1 10:49:50 MR. KATZ: All right. Can you read it
2 10:49:50 back, please.
3 10:50:03 (Record read as follows:
4 10:50:03 "QUESTION: What do you recall that
5 10:50:03 representatives from PI said with
6 10:50:03 respect to whether PI represented
7 10:50:04 retired players?")
8 10:50:05 THE WITNESS: Well, we --
9 10:50:08 MR. FEHER: Objection to form.
10 10:50:13 THE WITNESS: They -- they said that they
11 10:50:17 could secure the right for us to use retired players
12 10:50:19 in our Madden NFL game.
13 10:50:19 BY MR. KATZ:
14 10:50:22 Q Okay. And did they do that through an
15 10:50:24 agreement that you signed with retired player, or
16 10:50:28 did they do that through an agreement that you
17 10:50:29 signed with PI?
18 10:50:30 MR. FEHER: Objection to form.
19 10:50:33 THE WITNESS: In that time, it was my
20 10:50:36 understanding they went out and secured the
21 10:50:42 agreement of players to allow us to use their
22 10:50:45 identity rights in our game in return for a certain
23 10:50:49 amount of money, and the agreement was -- I signed
24 10:50:51 an agreement with PLAYERS INC.
25 BY MR. KATZ:

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REPORTER'S CERTIFICATION

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I, Quyen N. Do, 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 27th day of February, 2008.

/s/ Quyen N. Do
Quyen N. Do, RPR, CSR No. 12447

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