

# **EXHIBIT 19**

**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.

CIVIL ACTION 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.

~~~~~  
30(b)(6) Videotaped Deposition of  
GLENN M. EYRICH

Tuesday, February 12, 2008,  
9:30 a.m.

Mannatt, Phelps & Phillips, LLP,  
One Metro Center, 700 12th Street N.W.  
Washington, D.C.

Linda Ann Crockett, a Notary Public.

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**ITO**

Plaza Drive

California 95833

6.2700

6.2777

**AZ**

Central Avenue

Arizona 85012

6.2700

1 Reported by:  
Linda A. Crockett

2 APPEARANCES:

3 RONALD S. KATZ, ESQUIRE  
4 NOEL S. COHEN, ESQUIRE  
5 Mannatt, Phelps & Phillips, LLP  
6 One Metro Center  
7 700 12th Street, N.W.  
8 Suite 1100  
9 Washington, D.C. 20005  
10 (650) 812-1346  
11 On behalf of the Plaintiffs

12 DAVID FEHER, ESQUIRE  
13 ROY TAUB, ESQUIRE  
14 Dewey & LeBoeuf, LLP  
15 1301 Avenue of the Americas  
16 New York, New York 10019-6092  
17 (212) 259-7164  
18 On behalf of the Defendants

19 ALSO PRESENT:

20 Philip Rowley  
21 G. Marks, Videographer

22 30(b)(6) Deposition of GLENN  
23 EYRICH, taken with simultaneous videotape  
24 recording on Tuesday, February 12, 2008,  
25 beginning at 9:30 a.m., at Mannatt, Phelps &  
Phillips, LLP, One Metro Center, 700 12th  
Street, N.W., Washington, D.C., before Linda  
Ann Crockett, a Notary Public.

**P A U L S O N**

1 MR. FEHER: I'll object to the  
2 prior question.

3 BY MR. KATZ:

4 Q. And according to Exhibit 89,  
5 Exhibit 90 is a list of retired players who  
6 signed GLAs but not ad hoc agreements who  
7 received money from EA. Were you aware that  
8 monies flowed from EA to retired players  
9 pursuant to GLAs?

10 A. Am I supposed to read this?  
11 Exhibit 89, the letter?

12 Q. You may read it if you like. I  
13 produced it just so Mr. Feher can double check  
14 what I'm saying about these is correct. It  
15 doesn't add anything.

16 MR. FEHER: His question is as to  
17 what you already know.

18 BY MR. KATZ:

19 Q. Do you -- did you know that monies  
20 from EA flowed to retired players who had  
21 signed GLAs but not ad hoc agreements?

22 MR. FEHER: Objection to the form.

23 A. No, I was not aware of that.

24 Q. Directing your attention back to  
25 Exhibit 86, which is the GLA, one of the GLAs

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1 signed by Mr. Adderley. And you'll notice in  
2 the last -- second to last paragraph it says,  
3 it is further understood that the monies  
4 generated by such licensing of retired player  
5 group rights will be divided between the  
6 player and an escrow account for all eligible  
7 NFLPA members who have signed a group  
8 licensing authorization form. Are you aware  
9 of the creation of any such escrow account?

10 MR. FEHER: Objection to form.

11 A. No, I'm not.

12 Q. And directing your attention again  
13 to Exhibit 87, which is the letter to  
14 Mr. Huff, you will note in the second page of  
15 that, the retired player group licensing  
16 authorization form, the same language appears  
17 in the license. This is the second to last  
18 paragraph of the second page of Exhibit 87.  
19 It says it is further understood that the  
20 monies generated by such licensing of retired  
21 player groups rights will be divided by the  
22 player and escrow account for all eligible  
23 NFLPA members who have signed a group  
24 licensing authorization. Again, I ask you are  
25 you aware of any such escrow account being

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1 created?

2 MR. FEHER: Objection to form.

3 A. No.

4 Q. And then with respect to Exhibit  
5 88, the monies from PhotoFile to retired  
6 players, with respect to those monies, are you  
7 aware of any escrow account being created?

8 MR. FEHER: Objection to form.

9 A. No, not that I'm aware of.

10 Q. And directing your attention then  
11 to Exhibit 90, are those individuals that  
12 received money pursuant to a GLA, money from  
13 EA. Are you aware of any escrow account being  
14 created with respect to those monies?

15 MR. FEHER: Same objection.

16 A. I'm not aware of any escrow  
17 account.

18 Q. Moving back to the 2006 financial  
19 statement, which is -- what's the exhibit  
20 number on it?

21 A. 85.

22 Q. 85, thank you. If we look in the  
23 current liabilities section, which is Page  
24 6032, it says royalties due to players is the  
25 third item. Does that refer to retired

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1 STATE OF MARYLAND  
COUNTY OF BALTIMORE

2  
3 I, Linda A. Crockett, a Notary  
4 Public of the State of Maryland, do hereby  
5 certify that the within named, GLENN EYRICH,  
was deposed at the time and place herein set  
out, and after having been duly sworn by me,  
was interrogated by counsel.

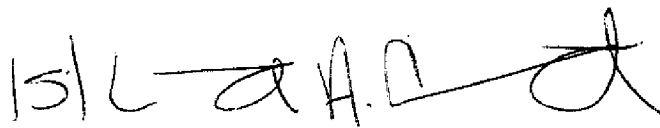
6 I further certify that the  
7 examination was recorded stenographically by  
me, and this transcript is a true record of  
the proceedings.

8 I further certify that the  
9 stipulations made herein were entered into by  
10 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,  
14 nor in any way interested in the outcome of  
15 this action.

16 As witness my hand and notarial  
17 seal this 13th day of February, 2008.

18  
19 My commission expires: December 1, 2008

20  
21 

22  
23 Notary Public

24  
25

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