

EXHIBIT 1

Walter Beach, III
CONFIDENTIAL - ATTORNEYS' EYES ONLY

Page 1

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF CALIFORNIA
3 SAN FRANCISCO DIVISION

-----X
4 BERNARD PAUL PARRISH, HERBERT ANTHONY
5 ADDERLEY, and WALTER ROBERTS, III, on
6 behalf of themselves and all others
7 similarly situated,

8
9 Plaintiffs,

10
11 Index No:
12 VS. C07-0943-WHA
13 NATIONAL FOOTBALL LEAGUE PLAYERS
14 ASSOCIATION, A Virginia corporation, and
15 NATIONAL FOOTBALL PLAYERS, INC., d/b/a
16 PLAYERS, INC., a Virginia corporation,

17
18 Defendants.

-----X
19 DEPOSITION OF WALTER BEACH, III
20 August 20, 2008
21 New York, New York

22
23 *** CONFIDENTIAL - ATTORNEYS' EYES ONLY ***

24 Confidential COPY
25 For Attorney's Eyes Only

26 Reported By:
27 LINDA J. GREENBERG
28 JOB NO. 204875

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1 August 20, 2008

2 9:34 A.M.

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7 Confidential deposition of
8 WALTER BEACH, III, taken by Defendants,
9 pursuant to Notice, held at Dewey &
10 LeBoeuf, L.L.P., 1301 Avenue of the
11 Americas, New York, New York, before Linda
12 J. Greenberg, a Certified Shorthand
13 Reporter and Notary Public of the State of
14 New York.

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1 A P P E A R A N C E S:

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4 MCKOOL SMITH, P.C.

Attorneys for Plaintiffs

5 300 Crescent Court

Suite 1500

6 Dallas, Texas 75201

7 BY: BRETT CHARHON, ESQ.

8

9

DEWEY & LeBOEUF, L.L.P.

10 Attorneys for Defendants

1301 Avenue of the Americas

11 New York, New York 10019-6092

12 BY: DAVID GREENSPAN, ESQ.

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16

17 ALSO PRESENT:

18

Ian Papendick, Esq.

19 Dewey & LeBoeuf, L.L.P.

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1 WALTER BEACH, III - CONFIDENTIAL
2 that licensing program that's what I
3 signed, and it says that they would divide
4 monies.

5 I don't know how much money, nor
6 do I know how they were going to divide it.

7 **Q. If there was a program whereby**
8 **the NFLPA was able to sell the rights to**
9 **six or more just retired players who had**
10 **signed GLAs, was it your understanding that**
11 **you would be entitled to a share of that**
12 **money, regardless of whether you were one**
13 **of the six players included in the group?**

14 MR. CHARHON: Object to form.

15 A. Yes, correct. Regardless of
16 whether I was a member -- if I were the six
17 or not, it didn't --

18 **Q. So if, for example, Herb**
19 **Adderley was licensed along with five other**
20 **retired players, not including you, your**
21 **expectation is that you should have**
22 **received a share of the money generated by**
23 **the licensing of Herb Adderley and the**
24 **other five retired players' rights?**

25 A. That's correct.

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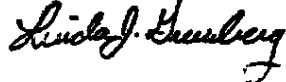
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C E R T I F I C A T E

I, Linda J. Greenberg, Professional Shorthand Reporter and Notary Public in and for the State of New York, do hereby certify that, WALTER BEACH, III, the witness whose deposition is hereinbefore set forth, was duly sworn and that such deposition is a true record of the testimony given by the witness to the best of my skill and ability.

I further certify that I am neither related to or employed by any of the parties in or counsel to this action, nor am I financially interested in the outcome of this action.

IN WITNESS WHEREOF, I have hereunto set my hand this 21st day of August, 2008.



Linda J. Greenberg

My commission expires: May 17, 2010