Parrish et al v. National Football League Players Incorporated

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Dewey & LeBoeuf LLP One Embarcadero Center, Suite 400 San Francisco, CA 94111

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DECLARATION OF IAN PAPENDICK

I, Ian Papendick, hereby declare as follows:

1. I am an attorney with Dewey & LeBoeuf LLP, attorneys for Defendants National Football League Players Association ("NFLPA") and National Football League Players Incorporated d/b/a Players Inc ("Players Inc") in this action. I am a member of the bar of the State of New York and my *pro hac vice* application was granted by the Court on August 6, 2008. I make this Declaration in support of Defendants' Motion in Limine No. 7. I have personal knowledge of each of the facts stated herein, and if called to testify, could and would testify completely hereto.

- Attached hereto as Exhibit 1 is an email from Bernard Parrish, dated
 November 7, 2006, bearing bates number CLASS003725.
- 3. Attached hereto as Exhibit 2 is a document that was produced by Plaintiffs in this case, bearing bates numbers CLASS003005-06.
- 4. Attached hereto as Exhibit 3 is a true and correct copy of an excerpt from the transcript of the deposition of Bernard Parrish, dated March 13, 2008.
- Attached hereto as Exhibit 4 is a true and correct copy of the Supplemental Report of Daniel A. Rascher, dated August 27, 2008.
- 6. Attached hereto as Exhibit 5 is a true and correct copy of a letter from LaShun Lawson to Jeremy Strauser, dated May 31, 2001, bearing bates numbers PI131529-30.
- 7. Attached hereto as Exhibit 6 is a true and correct copy of Plaintiffs' Responses and Objections to Defendants' Fourth Set of Interrogatories, dated May 21, 2008.

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