

# **EXHIBIT 6**

**Case No. C 07 0943 WHA**

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

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12 UNITED STATES DISTRICT COURT  
13 NORTHERN DISTRICT  
14 SAN FRANCISCO DIVISION

16 BERNARD PAUL PARRISH, HERBERT  
ANTHONY ADDERLEY, and WALTER  
17 ROBERTS III, on behalf of themselves and  
all others similarly situated,  
18 Plaintiffs,

CIVIL ACTION NO. C07 0943 WHA  
**PLAINTIFFS' RESPONSES AND  
OBJECTIONS TO DEFENDANTS' FOURTH  
SET OF INTERROGATORIES**

20 NATIONAL FOOTBALL LEAGUE  
PLAYERS ASSOCIATION, a Virginia  
21 corporation, and NATIONAL FOOTBALL  
LEAGUE PLAYERS INCORPORATED  
22 d/b/a PLAYERS INC, a Virginia  
23 corporation,  
24 Defendants.

25 Plaintiffs hereby serve their objections and responses to Defendants' Fourth Set of  
26 Interrogatories (collectively, the "Interrogatories" and individually, an "Interrogatory"), pursuant  
27 to the Federal Rules of Civil Procedure, as follows:  
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**PRELIMINARY STATEMENT**

The following objections and responses are based upon the information currently known to Plaintiffs, including information ascertained pursuant to Plaintiffs' reasonable inquiry in response to each Interrogatory. Discovery and investigation are on-going and may disclose the existence of additional responsive information. Plaintiffs reserve the right to amend or supplement these responses and objections as additional information is discovered, revealed, recalled or otherwise ascertained. Plaintiffs specifically reserve the right to utilize subsequently discovered information at trial.

**GENERAL OBJECTIONS**

The following General Objections apply to, and are specifically incorporated in, each response to each of the Requests, whether or not expressly stated in each individual response:

1. Plaintiffs object to the Requests to the extent that they seek to impose obligations beyond those set forth in the Federal Rules of Civil Procedure.

2. Plaintiffs object to the definition of the terms "You," "Your" and "Plaintiffs" to the extent that they purport to require the disclosure of information in the possession, custody or control of anyone other than Herbert Anthony Adderley. Plaintiffs further object to the definitions of these terms to the extent that they purport to require the disclosure of information in the possession, custody or control of "attorneys" on the ground and to the extent that such information is protected by the attorney-client privilege, word product doctrine or any other applicable privileges or protections from discovery.

3. Plaintiffs object to the definition of the term "Statute of Limitation" on the grounds that it misstates the applicable statute of limitations period for the claims at issue in this action. For purposes of these Interrogatories, Plaintiffs will interpret "Statute of Limitations" to mean the period from February 14, 2003 through February 14, 2007 inclusive.

1           4.     Plaintiffs object to the Requests to the extent that they seek privileged information,  
2 including but not limited to information or documents protected by the attorney-client privilege,  
3 the work product doctrine, the joint defense or common interest privilege, the protection afforded  
4 to settlement discussions, any agreement between parties, any court order or any other privilege  
5 or immunity. Insofar as the disclosure of information by Plaintiffs in response to any  
6 Interrogatory may be deemed to be a waiver of any privilege or right, such waiver shall be  
7 deemed to be a limited waiver with respect to that particular information only.  
8

9           5.     Plaintiffs objects to the Interrogatories to the extent they seek information that is  
10 not relevant to the claim or defense of any party and not reasonably calculated to lead to the  
11 discovery of such information.  
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13           6.     Plaintiffs object to the Interrogatories to the extent that they seek information that  
14 is publicly available, has already been furnished to, or is in the possession, custody or control of  
15 Defendants, or to the extent that they seek information already available to Defendants, available  
16 from public records or otherwise in the public domain and available to Defendants.  
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18           7.     Plaintiffs object to the Interrogatories to the extent that they seek information that  
19 is not within Plaintiffs possession, custody or control. Plaintiffs construe each Interrogatory as  
20 requiring it to engage in a reasonable inquiry and base their responses on information that is  
21 known or ascertainable through a reasonable inquiry.  
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23           8.     Plaintiffs responses to the Interrogatories are based on the information available as  
24 of the date hereof, and Plaintiffs reserve the right to supplement and/or amend their responses and  
25 objections if necessary.  
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27           9.     Plaintiffs reserve all objections or other positions they may have as to the  
28 competency, relevance, materiality, privilege, or admissibility of any information disclosed in  
response to the Interrogatories for any purpose whatsoever.

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**SPECIFIC RESPONSES TO INTERROGATORIES**

**INTERROGATORY NO. 14:**

Identify each (if any) occasion within the STATUTE OF LIMITATIONS when a LICENSEE actually utilized the IDENTITY RIGHTS of a member of the putative GLA CLASS without such retired player(s) receiving a payment from DEFENDANTS in connection with such use of his IDENTITY RIGHTS.

**RESPONSE TO INTERROGATORY NO. 14:**

Plaintiffs object to this Interrogatory on the grounds that it is vague, overbroad and not likely to lead to the discovery of admissible evidence because it does not limit the information sought to any rights licensed pursuant to a GLA in the form attached as Exhibit B to the Third Amended Complaint (the "Adderley GLA"), the agreement at issue in this action. Plaintiffs further object to this Interrogatory on the grounds that it calls for a legal conclusion. Plaintiffs further object to this Interrogatory to the extent that it seeks information regarding rights licensed under "ad hoc" agreements, agreements not at issue in this action. Plaintiffs further object to this Interrogatory on the grounds that it calls for information that is within the possession, custody or control of Defendants. Plaintiffs also object to this Interrogatory on the grounds that the term "utilize" is vague and ambiguous. For purposes of responding to this Interrogatory, Plaintiffs will interpret "utilize" to include the licensing of Identity Rights of a GLA Class Member pursuant to the Adderley GLA whether or not the licensee used the identity rights of a GLA Class Member. Subject to and without waiving these objections or the General Objections, Plaintiffs respond as follows:

Plaintiffs state that Defendants "utilized" GLA Class Member Identity Rights without making payment to the GLA Class Members for those rights each time Defendants licensed

1 retired player rights through, at the least, the license agreements identified in Response to  
2 Interrogatory No. 9.

3 Dated: May 21, 2008

MANATT, PHELPS & PHILLIPS, LLP

4  
5 By: Ryan S. Hilbert

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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,

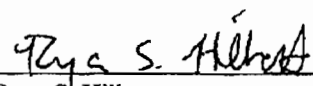
NATIONAL FOOTBALL LEAGUE PLAYERS ASSOCIATION, a Virginia corporation, and NATIONAL FOOTBALL LEAGUE PLAYERS INCORPORATED d/b/a PLAYERS INC, a Virginia corporation,

Defendants.

CIVIL ACTION NO. C07 0943 WHA  
VERIFICATION

I, Ryan S. Hilbert, have reviewed Plaintiffs' Objections and Responses to Defendants' Fourth Set of Interrogatories and know the contents thereof. I believe to the best of my knowledge that the matters stated therein are true and correct.

Declared under penalty of perjury this 21st day of May, 2008.

  
Ryan S. Hilbert

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**PROOF OF SERVICE**

I, Teri Martin, declare:

I am a resident of the State of California and over the age of eighteen years, and not a party to the within action; my business address is 1001 Page Mill Road, Building 2, Palo Alto, CA 94304. On May 21, 2008, I served the within document(s):

**PLAINTIFFS' RESPONSES AND OBJECTIONS TO DEFENDANTS' FOURTH SET OF INTERROGATORIES**

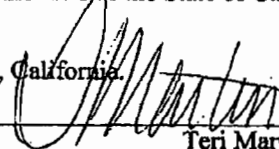
- By placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail, addressed as set forth below.
- By transmitting via facsimile the document listed above to the fax number(s) set forth below on this date before 5:00 p.m.
- By placing the document(s) listed above in a sealed Federal Express envelope and affixing a pre-paid air bill, and causing the envelope to be delivered to a Federal Express agent for delivery.
- By electronic mail to the below email addresses:

Jeffrey L. Kessler, Esq. David G. Feher, Esq. Eamon O'Kelly, Esq. David Greenspan, Esq. Dewey & LeBoeuf LLP 1301 Avenue of the Americas New York, NY 10019-6092 Email: jkessler@dl.com; dfeher@dl.com; dgreenspan@dl.com; jclark@dl.com; rtaub@dl.com; MDonovan@dl.com; ipapendick@dl.com; lcaplan@dl.com	Kenneth L. Steintal, Esq. Joseph Wetzel, Esq. Weil, Gotshal & Manges, LLP 201 Redwood Shores Parkway Redwood Shores, CA 94065 Email: bruce.meyer@weil.com; Joseph.Wetzel@weil.com
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I am readily familiar with the Manatt, Phelps & Phillips, LLP's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on May 21, 2008, at Palo Alto, California.



Teri Martin