

EXHIBIT 4

Case No. C 07 0943 WHA
Parrish v. National Football League Players Association, et al.

1
2 IN THE UNITED STATES DISTRICT COURT
3 FOR THE DISTRICT OF CALIFORNIA
4 SAN FRANCISCO DIVISION
5

-----X
6 BERNARD PAUL PARRISH, HERBERT
7 ANTHONY ADDERLEY, and WALTER
8 ROBERTS, III, on behalf of
9 themselves and all others
10 similarly situated,
11 Plaintiffs, No. CO7-0943-WHA
12 vs.

13 NATIONAL FOOTBALL LEAGUE PLAYERS
14 ASSOCIATION, a Virginia corporation
15 and NATIONAL FOOTBALL PLAYERS, INC.,
16 d/b/a PLAYERS, INC., a Virginia
17 corporation,
18 Defendants.
19 -----X

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23 DEPOSITION OF BRUCE LAIRD
24 New York, New York
25 Wednesday, September 24, 2008

26 Reported by:
27 LESLIE FAGIN
28 JOB NO. 205549

Bruce Laird

Page 2

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September 24, 2008

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11:17 a.m.

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Videotaped Deposition of BRUCE

6

LAIRD, held at the offices of Dewey &

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LeBoeuf, 1301 Avenue of the Americas, New

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York, New York, pursuant to Notice and

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Federal Rules of Civil Procedure, before

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Leslie Fagin, a Notary Public of the

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State of New York.

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ESQUIRE DEPOSITION SERVICES, LLC.

1-800-944-9454

1 **B. Laird**

2 A. \$100.

3 Q. And do you get a rebate of \$50 of
4 that 100?

5 A. Yes, sir.

6 Q. So the total you pay per year is
7 \$50?

8 A. Yes, sir.

9 Q. You said you believe you would have
10 expected to get payments the first time there
11 was a program that involved six or more
12 players whether they were active or retired,
13 right?

14 A. Uh-huh.

15 Q. So when you signed the agreement in
16 2000, in 2001, you knew there were trading
17 cards of football players, right?

18 MR. KATZ: Objection.

19 A. Yes.

20 Q. You knew there were trading cards
21 for active players in 2002, right?

22 MR. KATZ: Objection.

23 A. There were trading cards ever since
24 I remember being in the league.

25 Q. So you knew every year there were

1 **B. Laird**

2 **trading cards for active players, right?**

3 MR. KATZ: Objection.

4 A. Uh-huh.

5 **Q. You never received any funds from**
6 **the active player trading cards, right?**

7 MR. KATZ: Objection.

8 A. No.

9 **Q. You never complained to anyone**
10 **about not receiving that?**

11 MR. KATZ: Objection.

12 A. The playing cards --

13 **Q. Yes or no.**

14 MR. KATZ: He can answer the way he
15 wants.

16 A. The playing cards program has been
17 in effect for years, that deal has been
18 negotiated for years. This to me was a new
19 GLA looking to take care of present and
20 future active and former players in a new
21 licensing program, a new licensing program,
22 not Topps cards.

23 **Q. So your understanding when you**
24 **signed this, it would have nothing to do with**
25 **Topps, nothing to do with Upper Deck, nothing**

1 B. Laird

2 to do with other trading cards, right?

3 MR. KATZ: Objection.

4 A. Yeah.

5 Q. So it would have to be a new
6 category that had never dealt with prior to
7 2000?

8 A. Yes.

9 MR. KATZ: Objection.

10 Q. Now, prior to your testifying now,
11 you spent sometime talking with counsel, is
12 that correct?

13 A. Yes.

14 Q. And did you review the questions he
15 was going to ask you in this examination?

16 A. Some.

17 Q. And you reviewed the answers you
18 were going to give, correct?

19 A. Some, yes.

20 MR. KESSLER: I have no further
21 questions.

22 BY MR. KATZ:

23 Q. I have a couple further questions.

24 You just testified that you
25 believed that the Topps was not included in

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C E R T I F I C A T E

STATE OF NEW YORK)

: ss.

COUNTY OF NEW YORK)

I, LESLIE FAGIN, a Notary Public
within and for the State of New York, do
hereby certify:

That BRUCE LAIRD, the witness whose
deposition is hereinbefore set forth,
was duly sworn by me and that such
deposition is a true record of the
testimony given by the witness.

I further certify that I am not
related to any of the parties to this
action by blood or marriage, and that I
am in no way interested in the outcome
of this matter.

IN WITNESS WHEREOF, I have hereunto
set my hand this 24th day of September,
2004.



LESLIE FAGIN, RPR