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and National Football League Players Incorporated d/b/a Players Inc  
18

19 **UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
20 **SAN FRANCISCO DIVISION**

21 BERNARD PAUL PARRISH, HERBERT  
ANTHONY ADDERLEY, WALTER  
22 ROBERTS III,

Case No. C 07 0943 WHA

23 Plaintiffs,

**DEFENDANTS' OBJECTIONS TO  
PLAINTIFFS' EXHIBITS**

24 v.

25 NATIONAL FOOTBALL LEAGUE  
PLAYERS ASSOCIATION and NATIONAL  
26 FOOTBALL LEAGUE PLAYERS  
INCORPORATED d/b/a/ PLAYERS INC,

27 Defendants.  
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**DEFENDANTS' OBJECTIONS TO PLAINTIFFS' EXHIBITS**

Pursuant to Fed. R. Civ. P. 26(a)(3)(B) and this Court's Guidelines for Trial and Final Pretrial Conference in Civil Jury Cases, and the agreement and understanding of the parties, Defendants reserve the right to object to exhibits on Fed. R. Evid. 402, 403, and foundation grounds based on their particular use at trial. Defendants further reserve their right to supplement or modify their objections based on circumstances as they may evolve prior to the commencement of trial, including but not limited to Motions in Limine or any other pre-trial motions or objections.

<b>Exhibit No.</b>	<b>Description</b>	<b>Objection</b>
3	00/00/2006 NFLPlayers.com Website (D. Allen Deposition, Ex. 3) [No Bates]	Authenticity
4	07/20/2007 Frequently Asked Questions (Players, Inc. Website) (D. Allen Deposition, Ex. 4) [PI027307 - PI027310]	
5	00/00/2006 NFLPlayers.com Website (D. Allen Deposition, Ex. 5) [No Bates]	Authenticity
7	00/00/2006 NFLPlayers.com Website (D. Allen Deposition, Ex. 7) [No Bates]	Authenticity
8	12/00/1994 Articles of Amendment, National Football League Players, Inc. (D. Allen Deposition, Ex. 8) [PI000003 - PI000004]	
10	03/03/1987 Articles of Incorporation as amended re: Professional Athletes Foundation (D. Allen Deposition, Ex. 10) [PI000011 - PI000018]	
11	03/00/1994 National Football League Players Association Constitution (D. Allen Deposition, Ex. 11) [PI027327 - PI027346]	
12	05/25/2006 Memorandum from D. Allen and D. Ridley to NFLPA Contract Advisors attending 2006 seminar re: NFL Sponsorship Agreement and Its Effect on Club Sponsorships and Agent Obligations (D. Allen Deposition, Ex. 12) [PI059656 - PI059663]	
13	08/19/2004 NFL and Players Inc. Information Worksheet (D. Allen Deposition, Ex. 13) [PI016128 - PI016132]	
16	01/15/1993 NFL Players Association Retired Player Group Licensing Authorization Form signed by H. Adderley (D. Allen Deposition, Ex. 16) [No Bates]	

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Exhibit No.	Description	Objection
17	12/24/1996 NFL Players Association Retired Player Group Licensing Authorization Form signed by H. Adderley (D. Allen Deposition, Ex. 17) [No Bates]	Authenticity
18	00/00/0000 NFL Players Association Retired Player Group Licensing Authorization Forms, unsigned, with attached Positive Accomplishments of the NFLPA Retired Players Organization (D. Allen Deposition, Ex. 18) [No Bates]	Authenticity
19	05/01/2001 NFL Players Association Retired Player Group Licensing Authorization Form signed by H. Adderley (D. Allen Deposition, Ex. 19, Adderley Deposition, Ex. 167, Eyrich Deposition, Ex. 86) [PI000002]	
21	11/23/2002, 10/04/2003, 12/15/2003 Various NFL Players Association Retired Player Group Licensing Authorization Forms signed by: Chuck Bednarik, 11/23/2002; Reggie Berry, 10/04/2003; Al Bemiller, 12/15/2003; Kevin Greene (D. Allen Deposition, Ex. 21) [PI027509; PI027535; PI027524; PI000149]	Improper compilation
23	00/00/0000 Letter from D. Allen to NFLPA Member requesting members to sign a new Group Licensing Assignment (D. Allen Deposition, Ex. 23) [No Bates]	
24	07/05/2000 Addendum (to License Agreement between Electronic Arts and Players Inc.) (D. Allen Deposition, Ex. 24) [PI000128 - PI000132]	
25	10/17/2002 Letter from R. Gonzales, Electronic Arts, to D. Allen re: Notice of Renewal (D. Allen Deposition, Ex. 25) [PI000127]	
26	03/01/2001 License Agreement between Electronic Arts and National Football League Players Incorporated (D. Allen Deposition, Ex. 26, Linzner Deposition, Ex. 71) [PI000111 - PI000122]	
27	03/01/2001 Amendment to License Agreement between Electronic Arts and National Football League Players Incorporated (D. Allen Deposition, Ex. 27) [PI000123 - PI000126]	
28	03/01/2005 License Agreement between Electronic Arts Inc. and National Football League Players Incorporated (D. Allen Deposition, Ex. 28) [PI000055 - PI000071]	

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Exhibit No.	Description	Objection
29	03/01/2004 License Agreement between Electronic Arts Inc. and National Football League Players Incorporated (D. Allen Deposition, Ex. 29) [PI000072 - PI000086]	
30	03/01/2004 License Agreement between Electronic Arts Inc. and National Football League Players Incorporated (D. Allen Deposition, Ex. 30) [PI000087 - PI000099]	
31	03/01/2001 Service Agreement between The Upper Deck Company, LLC and National Football League Players Incorporated and License Agreement between The Upper Deck Co., LLC and the National Football League Players Incorporated (D. Allen Deposition, Ex. 31) [PI007077 - PI007144]	
32	03/01/2004 License Agreement between Upper Deck Company and National Football League Players Association (D. Allen Deposition, Ex. 32) [PI007159 - PI007173]	
33	03/01/2004 Service Agreement between The Upper Deck Company and National Football League Players Incorporated (D. Allen Deposition, Ex. 33) [PI007145 - PI007158]	
34	03/01/2000 License Agreement between The Topps Company, Incorporated and National Football League Players Association (D. Allen Deposition, Ex. 34) [PI006962 - PI006973]	
35	10/14/2002 Amendment No. 1 to License Agreement between The Topps Company and National Football League Players Association (D. Allen Deposition, Ex. 35) [PI006985 - PI006987]	
36	03/01/2004 License Agreement between The Topps Company, Inc. and National Football League Players Association (D. Allen Deposition, Ex. 36, Zucker Deposition, Ex. 393) [PI006231 - PI006245]	
37	03/01/2005 License Agreement between FatHead, Inc. and National Football League Players Incorporated (D. Allen Deposition, Ex. 37) [PI007869 - PI007881]	
38	03/01/2005 License Agreement between Atari, Inc. and National Football League Players Incorporated (D. Allen Deposition, Ex. 38) [PI007575 - PI007589]	

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Exhibit No.	Description	Objection
39	03/01/2001 License Agreement between Onfield Apparel Group, LLC and National Football League Players Incorporated (D. Allen Deposition, Ex. 39) [PI006429 - PI006448; PI006528 - PI006532]	Completeness
40	10/14/2005 Letter from N. Gibert, Reebok, to P. Adolph, Players Inc., enclosing copy of 03/01/2005 License Agreement between Onfield Apparel Group, LLC and National Football League Players Incorporated (D. Allen Deposition, Ex. 40) [PI006400 - PI006428]	
41	05/28/2003 Form LM-2 Labor Organization Annual Report of National Football League Players Association for period 03/01/2002 - 02/28/2003 (D. Allen Deposition, Ex. 41) [PI025593 - PI025652]	Completeness
42	05/18/2004 Form LM-2 Labor Organization Annual Report of National Football League Players Association for period 03/01/2003 - 02/29/2004 (D. Allen Deposition, Ex. 42) [PI025653 - PI025708]	Completeness
43	05/27/2005 Form LM-2 Labor Organization Annual Report of National Football League Players Association for period 03/01/2004 - 02/28/2005 (D. Allen Deposition, Ex. 43) [PI025709 - PI025768]	Completeness
44	05/30/2006 Form LM-2 Labor Organization Annual Report of NFL Players Association for period 03/01/2005 - 02/28/2006 (D. Allen Deposition, Ex. 44 [PI025769 - PI025785]; [PI025799 - PI025843]; [PI025858 - PI026000]; [PI026465 - PI026527])	Completeness
45	05/31/2007 Form LM-2 Labor Organization Annual Report of NFL Players Association for period 03/01/2006 - 02/20/2007 (Allen Deposition, Ex. 45) [PI026528 - PI026545]; [PI026561 - PI026600]; [PI026614 - PI026644]; [PI027233 - PI027294]	Completeness
46	08/01/2007 Confidential Memorandum from D. Allen to Screen Actors Guild National Board of Directors and Alternates re: Back Stage/Hollywood Reporter Articles of August 1, 2007 (D. Allen Deposition, Ex. 46) [ALLEN0001 - ALLEN0002]	Hearsay
47	08/02/2006 Email from E. Douglas to D. Allen re: Estimated Cash Flow Budget Projection (D. Allen Deposition, Ex. 47) [PI095108 - PI095120]	

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Exhibit No.	Description	Objection
48	03/20/2003 Letter from M. Maxman to B. Meyer re: Follow Up on Meeting in New York City on March 19, 2003 (D. Allen Deposition, Ex. 48) [PI095944 - PI095949]	Hearsay, completeness, settlement discussion (408)
49	08/04/2003 Email from V. Jenkins to V. Jenkins, P. Adolph, G. Upshaw, D. Allen, P. Allen re: Canton PowerPoint Presentation (attached) (D. Allen Deposition, Ex. 49) [PI095177 - PI095188]	
50	05/31/2006 Email from M. Moore to D. Allen re: presentation; (D. Allen Deposition, Ex. 50) [PI095089 - PI095107]	
51	08/18/2004 Email string from L. Lawson to D. Allen re: ESPN Videogames licensing questions (D. Allen Deposition, Ex. 51) [PI095363 - PI095367]	Hearsay
52	12/04/2003 Email from P. Adolph to D. Allen re: Retired Player Royalty Pool (D. Allen Deposition, Ex. 52) [PI095560]	
53	04/29/2005 Email from C. Beavers to D. Allen, A. Collins, C. Walker re: Take Two letter.doc (attached) (D. Allen Deposition, Ex. 53) [PI095443 - PI095444]	
54	05/16/2005 Email from C. Beavers to D. Allen, cc: A. Collins, C. Walker re: Retired Player GLA (D. Allen Deposition, Ex. 54) [PI095455]	
55	05/31/2005 Email string from D. Allen to H. Skall re: Retired Player Convention Numbers (D. Allen Deposition, Ex. 55) [PI095658]	
56	06/01/2006 License Agreement among Electronic Arts, Electronic Arts C.V., National Football Museum, Inc. dba The Pro Football Hall of Fame and National Football League Players Incorporated (D. Allen Deposition, Ex. 56) [PI000100 - PI000110]	
57	09/19/2002 Letter agreement from D. Allen to D. Malcolm, Microsoft Corporation, amending License Agreement (D. Allen Deposition, Ex. 57) [PI006060]	
58	10/27/2006 Email string from D. Allen to B. Laird re: players inc. retired players (Allen Deposition, Ex. 58) [PI095661 - PI095662]	
64	00/00/2004 National Football League Players Association 2004 - 2006 NFLPA Retired Members Directory (Linzner Deposition Ex. 64) [No Bates]	Authenticity, completeness

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Exhibit No.	Description	Objection
65	03/01/2004 License Agreement between Electronic Arts Inc., Electronic Arts C.V. and National Football League Players Incorporated (Linzner Deposition Ex. 65) [EA000107 - EA000121]	
66	11/24/2004 Fax cover page from J. Linzner to C. Walker attaching letter from J. Linzner to C. Walker re: License Proposal (Linzner Deposition, Ex. 66) [P1101773 - P1101776]	Hearsay
67	03/01/2005 License Agreement between Electronic Arts Inc., Electronic Arts C.V. and National Football League Players Incorporated (Linzner Deposition Ex. 67) [EA000090 - EA000106]	
68	12/07/2004 Letter from J. Linzner to C. Walker re: Revised License Proposal (Linzner Deposition, Ex. 68) [P1101781 - PL101782]	Hearsay
69	12/07/2004 Letter from J. Linzner to C. Walker re: Revised License Proposal (Lizner Deposition, Ex. 69) [EA000518 - EA000519]	Hearsay
71	03/01/2001 License Agreement between Electronic Arts and National Football League Players Incorporated (Linzner Deposition, Ex. 71) [PI000111 - PI000126]	
72	07/05/2000 Ex. E - Addendum amending 03/01/1998 License Agreement between Electronic Arts and Players Inc. (Linzner Deposition, Ex. 72) [No Bates]	Authenticity, completeness
74	10/17/2007 Web page: <a href="http://www.easportsbig.com/games/nflstreet2">http://www.easportsbig.com/games/nflstreet2</a> (Linzner Deposition, Ex. 74) (No Bates)	Authenticity, hearsay
75	06/01/2006 License Agreement between Electronic Arts Inc. and Electronic Arts C.V., National Football Museum, Inc. dba The Pro Football Hall of Fame and National Football League Players Incorporated (Linzner Deposition, Ex. 75) [EA000135 - EA000145]	
78	10/12/2004 Email chain from J. Linzner to C. Walker, cc: J. Nahra and L. Lawson re: Contract (Linzner Deposition, Ex. 78) [P1116578 - P1116580]	Hearsay
79	03/01/2004 License Agreement between Electronic Arts Inc. and National Football League Players Incorporated (Linzner Deposition, Ex. 79) [EA000122 - EA000134]	

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Exhibit No.	Description	Objection
80	03/01/2006 License Agreement between Electronic Arts Inc. and Electronic Arts C.V. and National Football League Players Incorporated (Linzner Deposition, Ex. 80) [EA000057 - EA000076]	
81	03/01/2006 License Agreement between Electronic Arts Inc. and National Football League Players Incorporated (Linzner Deposition, Ex. 81) [EA000077 - EA000089]	
84	12/00/1994 Articles of Amendment, National Football League Players, Inc. signed by D. Allen (Eyrich Deposition, Ex. 84) [PI000003 - PI000010]	
85	02/28/2006 Financial Statements NFL Players Association, 03/01/2005 - 02/28/2006 (Eyrich Deposition, Ex. 85) [PI096027 - PI096087]	
87	00/00/0000 Letter from G. Upshaw to S. Huff enclosing Group Licensing Authorization Agreement executed by S. Huff 02/29/2000 (Eyrich Deposition, Ex. 87) [No Bates]	Authenticity, hearsay, social security number should be redacted
88	00/00/0000 Ex. 3 - List of Players and Player Royalties (various dates from 06-17-2003 - 12/12/2006 (Eyrich Deposition, Ex. 88) [No Bates]	Completeness
89	02/08/2008 Letter from D. Greenspan to R. Hilbert re: Parrish et al. v. Players Inc., et al.(Eyrich Deposition, Ex. 89) [No Bates]	
91	02/28/2006 Amendment to the 03/01/2000 NFLPA - Players Inc Licensing Agreement (Eyrich Deposition, Ex. 91, Upshaw Deposition, Ex. 124, D. Allen Deposition, Ex. 15) [PI000145 - PI000146]	
93	01/13/1995 Letter from D. Cooper to D. Allen enclosing signed opinion of Duff and Phelps Capital Markets Co. relating to analysis of licensing operations (Eyrich Deposition, Ex. 93, Upshaw Deposition, Ex. 126) [PI131035 - PI131052]	
94	00/00/2005 Players Inc. document re FY 2005 (Eyrich Deposition, Ex. 94) [PI102942 - PI102976]	
95	03/01/2000 Agreement between the National Football League Players Association and National Football League Players Incorporated (Eyrich Deposition, Ex. 95) [PI000133 - PI000144]	
96	00/00/2002 Equal Share Licensing Royalty Distribution Criteria, Royalty Eligibility for 2002 Season, Payment During 2003 Season (Eyrich Deposition, Ex. 96) [PI095951]	



Exhibit No.	Description	Objection
97	02/28/2007 Financial Statements NFL Players, 03/01/2006 - 02/28/2007 (Eyrich Deposition, Ex. 97) [PI095967 - PI095989; PI095991 - PI096026]	
98	10/09/2007 Declaration of Andrew Feffer In Support Of Defendants' Opposition To Plaintiffs' Motion For Leave To File A Third Amended Complaint with attachments (Eyrich Deposition, Ex. 98) [No Bates]	
99	01/24/2001 Letter from R. Goodell to E. Upshaw re: Sponsorship Agreement (Eyrich Ex. 99) [PI090965 - PI090978; PI090980 - PI091012]	Hearsay
100	5/27/2005 Form LM-2 Labor Organization Annual Report, Nat'l Football League Players Association for the period 03/01/2004 - 02/28/2005, (Eyrich Deposition Ex. 100) [CLASS 000653 - CLASS 000712]	Authenticity, completeness
101	05/30/2006 Form LM-2 Labor Organization Annual Report, NFL Players Association, from 3/1/2005 through 2/28/2006 (Eyrich Deposition, Ex. 101) [PI025769 - PI026523; PI026525 - PI026527]	Completeness
102	00/00/0000 Gross Licensing Revenues FY 2003 (Eyrich Deposition, Ex. 102) [No Bates]	Best evidence, completeness
103	00/00/0000 Gross Licensing Revenues FY 2004 (Eyrich Deposition, Ex. 103) [No Bates]	Best evidence, completeness
104	00/00/0000 Gross Licensing Revenues FY 2005 (Eyrich Deposition, Ex. 104) [No Bates]	Best evidence, completeness
105	00/00/0000 Gross Licensing Revenues FY 2006 (Eyrich Deposition, Ex. 105) [No Bates]	Best evidence, completeness
107	09/18/2006 2005 Royalty Eligibility Roster - Alpha by Name - Final (Eyrich Deposition, Ex. 107) [No Bates]	
110	11/22/2002 NFL Players Association Retired Player Group Licensing Authorization Form signed by Herb Adderley (Upshaw Deposition, Ex. 110, Adderley Deposition, Ex. 168) [PI000001]	
112	06/10/2003 Letter from Nahra to W. Eastman and R. Mix re: Retired NFL Player Group Licensing (Upshaw Deposition, Ex. 112) [PI095694 - PI095696]	
113	06/20/2003 Form letter from G. Upshaw re: payment for use of retired players' names and images (Upshaw Deposition, Ex. 113) [PI095928]	

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Exhibit No.	Description	Objection
114	06/30/2005 Memorandum from P. Allen to G. Upshaw re: June 2005 Players Inc. Monthly Report (Upshaw Deposition, Ex. 114) [PI102401 - PI102402]	
115	05/01/2007 Memorandum from A. Feffer to G. Upshaw re: April 2007 Players Inc. Monthly Report (Upshaw Deposition, Ex. 115) [PI102691 - PI102692]	
117	01/15/2006 Article entitled "Ex-Players Say NFL Neglects Retirees; Hall of Famers League, Union Leader Fall Short in Providing Benefits," by C. Chandler, in The Charlotte Observer (Upshaw Deposition, Ex. 117) [CLASS 003000 - CLASS 003001]	Authenticity, hearsay
118	11/09/2005 Retired Players Group Licensing Assignment signed by K. Greene (Upshaw Deposition, Ex. 118) [PI000148]	
119	01/20/2006 Memorandum from G. Upshaw to NFLPA Retired Player Members re: The Truth About Retiree Benefits (Upshaw Deposition, Ex. 119) [CLASS 003007]	Completeness
121	00/00/2006 NFLPlayers.com Website (Upshaw Deposition, Ex. 121) [No Bates]	Authenticity
122	07/20/2007 Mission Statement (Players, Inc. Website) (Upshaw Deposition, Ex. 122) [PI027324 - PI027326]	Authenticity
125	05/09/1994 Agreement between National Football League Players Association and National Football League Players Incorporated (Upshaw Deposition, Ex. 125, Eyrich Deposition, Ex. 92) [PI131018 - PI131034]	
128	02/03/2008 Article entitled "The Pain Game," by M. Leahy, in The Washington Post Magazine (Upshaw Deposition, Ex. 128) [No Bates]	Hearsay
129	01/31/2008 Article entitled "Upshaw: NFLPA won't take from current pensions to help ex-players," by M. Sando, on ESPN.com website (Upshaw Deposition, Ex.129) [No Bates]	Hearsay, completeness
131	00/00/0000 NFL Players Association Constitution (Upshaw Deposition, Ex. 131) [PI130995 - PI131008; PI131011 - PI131015; PI131017]	Completeness
132	00/00/0000 NFL Players Association Constitution (Upshaw Deposition, Ex. 132) [PI130970 - PI130994]	

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Exhibit No.	Description	Objection
133	00/00/2007 NFLPA Constitution - Retired Players resolution re: removing from office leaders who engage in conduct detrimental to best interests of NFLPA (Upshaw Deposition, Ex. 133) [PI130969]	
134	00/00/2006 Amendments to the NFLPA Constitution Regarding Retired Players (Upshaw Deposition, Ex. 134) [PI130966]	
139	06/22/2006 Letter from H. Skall to P. Allen re: Skall's resignation effective 07/19/2006 (Skall Deposition, Ex. 139) [SKALL00001]	
142	10/15/2000, 10/04/2002, 10/07/2004, 10/28/2003, 11/09/2005, NFL Players Association Group Licensing Assignments (Skall Deposition, Ex. 142) [PI000980, PI000174, PI011131, PI000147-PI000148]	Improper compilation
144	07/18/2002 Letter from H. Skall to K. Hudson, cc: T. Murphy enclosing NFL 1003 form (Skall Deposition, Ex. 144) [PI068756 - PI068758]	
148	04/08/2003 Letter from H. Skall to H. Adderley re: group licensing program (Skall Deposition, Ex. 148) [No Bates]	Authenticity, completeness
151	03/08/2006 Email from Wyman to Moore re FW: H. Adderley (Skall Deposition, Ex. 151) [No Bates]	Authenticity
152	09/13/2004 Email from S. Cox to L. Lawson re: conference call on ESPN Videogames Licensing questions (Skall Deposition, Ex. 152) [PI119769 - PI119777]	Hearsay
153	00/00/0000 Letter from G. Upshaw to S. Huff enclosing Group Licensing Authorization Agreement signed by S. Huff, dated 02/29/2000 (H. Skall Deposition, Ex.153) [No Bates]	Authenticity, hearsay, social security number should be redacted
156	04/04/2006 Email from P. Adolph to H. Skall and D. Allen, cc: S. Wyman and M. Muneer, re: Jim Brown (Skall Deposition, Ex. 156) [PI130568 -PI130570]	
163	06/14/2007 Letter from K. Skubick to S. Huff re: Playoff Corporation (P. Allen Deposition, Ex. 163) [CLASS 000305]	
170	05/00/2004 May 2004 Players Inc. Monthly Departmental Reports 05/00/2004 (P. Allen Deposition, Ex. 170) [PI102273 - PI102281]	
171	09/00/2004 September 2004 Players Inc. Monthly Departmental Reports (P. Allen Deposition, Ex. 171) [PI102301 - PI102309]	

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Exhibit No.	Description	Objection
172	11/01/2001 Memorandum from P. Allen to G. Upshaw re: October 2001 Players Inc. Monthly Report (P. Allen Deposition, Ex. 172) [PI102057 - PI102058]	
173	2/10/2003 Memorandum from P. Allen to G. Upshaw re: January 2003 Players Inc. Monthly Report (P. Allen Deposition, Ex. 173) [PI102074 - PI102075]	
174	11/00/2005 Memorandum from P. Allen to G. Upshaw re: October 2005 Players Inc. Monthly Report (P. Allen Deposition, Ex. 174) [PI102433 - PI102434]	
175	12/08/2005 Memorandum from P. Allen to G. Upshaw re: November 2005 Players Inc. Monthly Report (P. Allen Deposition, Ex. 175) [PI102415 - PI102417]	
394	03/01/2007 License Agreement between The Topps Company and National Football League Players Association (Zucker Deposition, Ex. 394) [TOPPS003843 - TOPPS003857]	
395	03/01/2004 Service Agreement between The Topps Company, Inc. and the National Football League Players Incorporated (Zucker Deposition, Ex. 395) [PI006218 - PI006230]	
396	01/09/2008 Email from K. Skubick to E. Liebler, J. Vignier, M. Tomasco, and A. Zucker re: 2008 Veteran and Retired Players (Zucker Deposition Ex. 396) [TOPPS001385 - TOPPS001392]	Hearsay, Authenticity
397	05/17/2005 Email from L. Purgess to A. Zucker re: 50th FB Beckett/Tuff Stuff Ad (Zucker Deposition, Ex. 397) [TOPPS000341 - TOPPS000343]	Hearsay, Authenticity
398	05/20/2005 Email from L. Purgess to A. Zucker re: 50th FB Beckett/Tuff Stuff Ad (Zucker Deposition, Ex. 398) [TOPPS000344 - TOPPS000347; TOPPS000337]	Hearsay, Authenticity
399	01/25/2006 Email from S. Wyman to A. Zucker regarding Barry Sanders/Super Bowl (Zucker Deposition, Ex. 399) [TOPPS000540 - TOPPS000541]	Hearsay, Authenticity
400	09/21/2006 Email from E. Liebler to K. Bush and J. Vignier re: Terry Bender (Zucker Deposition, Ex. 400) [TOPPS001793 - TOPPS001795]	Hearsay, Authenticity
401	01/30/2007 Email from A. Zucker to K. Bush, K. Skubick and E. Liebler re: Super Bowl meeting (Zucker Deposition, Ex. 401) [TOPPS001112 - TOPPS001119]	Hearsay, Authenticity

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Exhibit No.	Description	Objection
402	07/11/2007 Email from K. Skubick to E. Liebler, J. Vignier, A. Zucker, and M. Tomasco re: interested players (Zucker Deposition, Ex. 402) [TOPPS003026 - TOPPS003027]	Hearsay, Authenticity
403	09/05/2007 Email from E. Liebler to A. Manolakas, A. Zucker, D. Airel, K. Bush, J. Vignier, N. Krzesny, B. Laudate, M. Tomasco, D. Morris and K. Skubick re: contracting football players (Zucker Deposition, Ex. 403) [TOPPS003073 - TOPPS003075]	Hearsay, Completeness, Authenticity
405	01/09/2008 Email from E. Liebler to K. Skubick, J. Vignier, M. Tomasco and A. Zucker regarding 2008 Offers to Veterans and Retired players (Zucker Deposition, Ex. 405) [TOPPS003405 - TOPPS003406]	Hearsay, Authenticity
406	00/00/0000 Trading Card Timeline (Zucker Deposition, Ex. 406) [TOPPS000539]	Hearsay, Authenticity
408	03/01/2000 Service Agreement between The Topps Company Incorporated and National Football League Players Incorporated (Friss Deposition, Ex. 408) [PI006974 - PI006984]	
409	09/22/2004 Licensing Royalty Report - Licensee: The Topps Company Inc., June - August 2004 (Friss Depo Ex. 409) [TOPPS003874 - TOPPS003886]	Hearsay, Authenticity
503	03/27/2000 NFL Players Association Retired Players Licensing Authorization Form signed by V. Abbott (Nahra Deposition, Ex. 503) [PI027381]	
504	10/24/2003 NFL Players Association Retired Players Licensing Authorization Form signed by A. Banks (Nahra Deposition, Ex. 504) [PI027474]	
505	10/13/2003 NFL Players Association Group Licensing Agreement signed by J. Cheyonski (Nahra Deposition, Ex. 505) [PI027754]	
506	4/12/2006 NFL Players Association Group Licensing Assignment signed by L. Aguiar (Nahra Deposition, Ex. 506) [PI027393]	
508	06/01/2005 Email from C. Walker to D. Allen re: revisions to GLA (Nahra Deposition, Ex. 508) [PI095459]	

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Exhibit No.	Description	Objection
509	06/01/2005 Email from E. Kelly to D. Allen re: reviewing GLA (Nahra Deposition, Ex. 509) [PI095460 - PI095461]	
510	06/01/2005 Email from C. Walker to E. Kelly, P. Allen and J. Nahra re: language in current GLA (Nahra Deposition, Ex. 510) [PI134283]	
511	06/01/2005 Email from J. Nahra to E. Kelly, P. Allen and C. Walker re: changes to current GLA (Nahra Deposition, Ex. 511) [PI134284]	Attorney-client privilege
512	06/01/2005 Email from P. Allen to E. Kelly, C. Walker and J. Nahra advising GLA looks good (Nahra Deposition, Ex. 512) [PI134285]	
513	12/17/2003 Email to D. Murray from J. Nahra re: FSC (Nahra Deposition, Ex. 513) [PI126728]	Hearsay
514	11/18/2003 Email to L. Lawson from C. Walker re: Follow Up/NFL Players Agreement Renewal Proposal royalty rates (Nahra Deposition, Ex. 514) [PI127268 - PI127270]	Hearsay
515	03/22/2007 Email from J. Nahra to K. Haley and G. Gertzog re: Under Armour Ad (Nahra Deposition, Ex. 515) [PI129427 - PI129429]	Hearsay
516	03/18/2005 Email to J. Nahra from P. Adolph re: Players Inc. License Agreement (Nahra Deposition, Ex. 516) [PI119245 - PI119246]	Hearsay, Completeness
518	10/05/2004 Email to J. Linzner, from C. Walker, cc: J. Nahra re: Contract (Nahra Deposition, Ex. 518) [PI116576 - PI116577]	Hearsay
519	10/12/2004 Email chain from C. Walker to H. Skall re: Contract (Nahra Deposition, Ex. 519) [PI1103832 - PI1103833]	Hearsay
520	05/23/2006 Redacted email chain from J. Kuntz to J. Nahra re: EA Contract (Nahra Deposition, Ex. 520) [PI121569 - PI121572]	Hearsay

Exhibit No.	Description	Objection
521	11/01/2007 Email to A. Feffer from J. Nahra re: Hall of Fame (Nahra Deposition Ex. 521) [PI126892 - PI126894]	Hearsay
522	11/01/2007 Email to P. Cairns from A. Feffer re issues with J. Clay (Nahra Deposition, Ex. 522) [PI121593 - PI121594]	Hearsay
523	09/24/2003 Email chain from J. Nahra to D. Murray re: Fantasy Sports Championships (Nahra Deposition, Ex. 523) [PI127288 - PI127290]	Hearsay
601	04/04/2003 Letter from C. Mehri and J. Cochran, Jr. to R. Berthelsen re: Players, Inc. Accounting Litigation (Berthelsen Deposition, Ex. 601) [PI095688 - PI095690]	Hearsay, settlement discussion (408)
602	06/10/2003 Letter from J. Nahra to W. Eastman and R. Mix re: Retired NFL Player Group Licensing (Berthelsen Deposition, Ex. 602) [PI095694 - PI095696]	
603	07/23/2003 Redacted email chain from L. Delbene and T. Delbene to R. Berthelsen, cc: F. Vuono, C. Munson, T. Dalton re: GLA Rights (Berthelsen Deposition, Ex. 603) [PI132613 - PI132614]	Hearsay
604	12/02/2005 Email from P. Allen to D. Allen, C. Gaines, R. Berthelsen, C. Walker, J. Nahra re: Meeting w/Gene (Berthelsen Deposition, Ex. 604) [PI103139]	
605	06/16/2006 Email chain from G. Gertzog to D. Allen re: commercial agreement (Berthelsen Deposition, Ex. 605) [PI129125 - PI129128]	Hearsay
608	05/30/2006 Form LM-2 Labor Organization Annual Report, NFL Players Association, for period 03/01/2005 - 02/28/2006 (Berthelsen Deposition, Ex. 608) [PI025769 - PI025786]	Completeness
609	00/00/0000 Form LM-2 Labor Organization Annual Report, NFL Players Association, page 31-33 of 759, Schedule 13 - Membership Status (Berthelsen Ex. 609) [PI025799 - PI025801]	Completeness

Exhibit No.	Description	Objection
610	00/00/0000 Form LM-2 Labor Organization Annual Report, NFL Players Association, Page 37-38 of 759 (Berthelsen Ex. 610) [PI025805 - PI025806]	Completeness
611	00/00/0000 Form LM-2 Labor Organization Annual Report, NFL Players Association, pages 53-60 (Berthelsen Deposition, Ex. 611) [PI025821 - PI025828]	Completeness
612	00/00/0000 Form LM-2 Labor Organization Annual Report, NFL Players Association, page 64 (Berthelsen Deposition, Ex. 612) [PI025832]	Completeness
613	00/00/0000 Form LM-2 Labor Organization Annual Report, NFL Players Association, Schedule 17 - Contributions, Gifts & Grants, pgs. 86-88 (Berthelsen Deposition, Ex. 613) [PI025854 - PI025856]	Completeness
614	00/00/0000 Form LM-2 Labor Organization Annual Report, NFL Players Association, Schedule 18 - General Overhead, pg. 90 (Berthelsen Deposition, Ex. 614) [PI025858]	Completeness
615	00/00/0000 Form LM-2 Labor Organization Annual Report, NFL Players Association, page 606 (Berthelsen Deposition, Ex. 615) [PI026374]	Completeness
616	00/00/0000 Form LM-2 Labor Organization Annual Report, NFL Players Association. Additional Information Summary, pages 757-759 (Berthelsen Deposition, Ex. 616) [PI026525 - PI026527]	Completeness
617	05/31/2007 Form LM-2 Labor Organization Annual Report of NFL Players Association for period 03/01/2006 - 02/28/2007, (Berthelsen Deposition, Ex. 617) [PI026528 - PI026546]	Completeness
618	00/00/0000 Form LM-2 Labor Organization Annual Report, NFL Players Association, Schedule 13 - Membership Status, pg. 34-35 (Berthelsen Deposition, Ex. 618) [PI026561 - PI026562]	Completeness



Exhibit No.	Description	Objection
619	00/00/0000 Form LM-2 Labor Organization Annual Report, NFL Players Association, Schedule 17 - Contributions, Gifts & Grants, pgs. 82-86 (Berthelsen Deposition, Ex. 619) [PI026609 - PI026613]	Completeness
620	00/00/0000 Form LM-2 Labor Organization Annual Report, NFL Players Association, Schedule 20 - Benefits, pgs. 763, 765-767 (Berthelsen Deposition, Ex. 620) [PI027290; PI027292 - PI027294]	Completeness
625	03/31/2008 Credited Seasons Listing - Pension Credited Seasons as of March 31, 2008 (Noll Deposition, Ex. 625) [No Bates]	Completeness
626	03/31/2008 Nonvested Inactive Players (NFL Player Database - Pension Credited Seasons as of 03/31/1998) as of March 31, 2008 (Noll Deposition, Ex. 626) [No Bates]	Completeness
627	03/31/2008 Retired Players (NFL Player Database - Pension Credited Seasons as of 03/31/1998) (Noll Deposition, Ex. 627) [No Bates]	Completeness
628	03/31/2008 Deceased Players (NFL Player Database - Pension Credited Seasons as of 03/31/1998) (Noll Deposition, Ex. 628) [No Bates]	Completeness
639	05/23/2003 NFL Players Association Retired Player Group Licensing Authorization Form signed by Walter Beach III (Beach Deposition, Ex. 639) [PI027504]	
640	12/26/1996 NFL Players Association Retired Player Group Licensing Authorization Form signed by Walter Beach III 12/26/1996 (Beach Deposition Ex. 640) [No Bates]	
643	00/00/0000 Madden 2007 Screenshot Player Management 65 Browns CB#33 (Beach Deposition Ex. 643) [No Bates]	Authenticity, Not produced in discovery
644	00/00/0000 Walter Beach trading card (front and back) (Beach Deposition Ex. 644) [No Bates]	Best Evidence, Not produced in discovery
1000	00/00/0000 Form Letter from G. Upshaw re: signing GLA [CLASS 001709]	Authenticity
1001	03/01/2003 License Agreement between Flipp Sports and National Football League Players Incorporated [PI007946 - PI007958]	
1002	03/01/2004 License Agreement between Fox Interactive Media, LLC and National Football League Players Incorporated [PI007996 - PI008008]	

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Exhibit No.	Description	Objection
1003	03/01/2004 License Agreement between Activa Consumer Promotions Inc. and National Football League Players Incorporated [PI007490 - PI007503]	
1004	03/01/2006 License Agreement between GameWear, Inc. and National Football League Players Incorporated [PI008047 - PI008059]	
1005	03/01/2006 License Agreement between Activa Consumer Promotions Inc. and National Football League Players Incorporated [PI007461 - PI007474]	
1006	03/01/2004 License Agreement between Jamdat Mobile Inc. and National Football League Players Incorporated [PI008135 - PI008147]	
1007	03/01/2006 License Agreement between Airplay and National Football League Players Incorporated [PI007514 - PI007526]	
1008	03/01/2004 License Agreement between K2 Licensing & Promotions and National Football League Players Incorporated [PI008188 - PI008200]	
1009	03/01/2003 License Agreement between Atari, Inc. and National Football League Players Incorporated [PI007590 - PI007602]	
1010	03/01/2006 License Agreement between Little Earth Productions, Inc. and National Football League Players Incorporated [PI008201 - PI008214]	
1011	02/22/2006 Email chain from C. Walker to P. Cairns, cc: J. Nahra re: HOF [EA000235 - EA000237]	Hearsay
1012	03/01/2003 License Agreement between Fanball Interactive, LLC d/b/a Fanball.com and National Football League Players, Incorporated [PI007823 - PI1007834]	
1013	03/01/2004 License Agreement between MBI, Incorporated and National Football League Players Incorporated [PI008242 - PI008254]	
1014	03/01/2003 License Agreement between The Merrick Mint and National Football League Players Incorporated [PI006036 - PI006048]	
1015	03/01/2004 License Agreement between Motion Imaging Inc. and National Football League Players Incorporated [PI006073 - PI006086]	
1016	03/01/2007 License Agreement between MVP Pics USA, LLC. and National Football League Players Incorporated [PI005972 - PI005984]	

Exhibit No.	Description	Objection
1017	03/01/2004 License Agreement between National Direct and National Football League Players Incorporated [PI006087 - PI006099]	
1019	03/01/2005 License Agreement between USAOPOLY, Inc. and National Football League Players Incorporated [PI007174 - PI007186]	
1020	03/01/2004 License Agreement between The Upper Deck Company and National Football League Players Incorporated [PI007063 - PI007076]	
1021	05/23/2008 Expert Report of Daniel A. Rascher [No Bates]	Hearsay
1023	03/01/2003 License Agreement between USAOPOLY, Inc. and National Football League Players Incorporated [PI007187 - PI007199]	
1024	02/28/2005 NFLPA Financial Statements (March 1, 2004 - February 28, 2005) [PI096088 - PI096117]	Completeness
1025	02/29/2004 NFLPA Financial Statements (March 1, 2003 - February 29, 2004) [PI096151 - PI096181]	Completeness
1026	02/28/2003 NFLPA Financial Statements (March 1, 2002 - February 28, 2003) [PI096215 - PI096243]	Completeness
1027	11/21/06 Letter from H. Henderson to E. Upshaw re NFL Europe Injury Protection [PI091011 - PI091012]	Hearsay
1029	05/24/2001 Letter from L. Lawson to S. Felsen re: their new more effective system for updating player rosters [PI131161 - PI131192]	
1030	00/00/0000 Letter from G. Upshaw to J. Settle re: signing a GLA to include him in planned video games [PI131193 - PI131194]	
1031	07/29/2003 Letter from L. Lawson to M. Matthews re: payments to retired players for usage in the USAopoly board game [PI131156 - PI131157]	
1032	12/20/2005 Email from G. Upshaw to C. Walker re: deal memorandum [PI113820 - PI113825]	Hearsay
1033	00/00/0000 NFL Players- Arena Football League Players Association Overview Brochure [PI118258 - PI118284]	
1034	02/22/2006 Email from C. Walker to P. Cairns re: Hall of Famers Agreement [PI113599 - PI113602]	Hearsay

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Exhibit No.	Description	Objection
1035	08/27/2007 Email from J. Nahra to K. Bush re: TKLegacy College Sets and Players [PI132121 - PI132134]	Hearsay
1036	09/12/2000 Memorandum from S. Wyman to D. Allen re: Sony allowing retired players in GameDay 2001; 2001 03 13 Letter from G. Upshaw to L. Wilson re payment from Players Inc. for inclusion in video games [PI131430; [PI131809 - PI131810]	Improper Compilation
1037	12/31/2005 EA Licensing Proposal; 05/10/2007 Email from B. Soroca to J. Goodstadt re: ESPN FF Print Ad for Approval; [PI101477 - PI101478]; [PI101750]	Hearsay
1038	00/00/0000 National Football League Players Incorporated's Brochure on Marketing and Sponsorship Opportunities [PI016146 - PI016169]	
1039	09/24/2003 Email from J. Nahra to D. Murray re: active players in the Fantasy Sports Championships 11/01/2007 Email chain from J. Nahra to A. Feffer re: Hall of Fame[PI120202 - PI120204; PI121038 - PI121047 -	Hearsay
1040	04/24/2006 Email from J. Nahra to P. Cairns re: Hall of Fame [PI113555 - PI113558]	Hearsay, Completeness
1041	00/00/0000 Appendix H which attaches Equal Share Royalty History [PI141323 - PI141324]	Completeness
1042	09/06/2006 Email from M. Hope to K. Bush re: OMJ License revisions [PI110786 - PI110800]	Hearsay
1043	11/16/2007 Email from N. Pozzi to W. Whalen re: Madden Roster [PI131863 - PI131869]	
1044	09/21/2006 Email from K. Bush to N. Krzesny re player logo; 01/19/2006 Email from K. Bush to Q. Thomas re; Don Cockroft - Retired player from Cleveland Browns [PI132055 - PI132056]; [PI132111 - PI132112]]	Hearsay, Completeness, Improper Compilation
1045	09/08/2004 Email from S. Cox to H. Skall re: videogame licensing questions [PI132215 - PI132221]	Hearsay
1046	06/16/2004 email from C. Walker to L. Pappano re WCOFF insurance [PI132432 - PI132434]	Hearsay
1047	00/00/0000 Players Inc. brochure on payments to players; 00/00/2004 Players Inc. brochure re 2004 [PI132619 - PI132629]; [PI132671 - PI132697]	Improper compilation

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Exhibit No.	Description	Objection
1048	05/22/2002 Email from H. Skall to A. Manolakas re: NFL Alumni "Legends" [PI132817 - PI132818]	
1049	03/15/2004 Email from P. Allen to C. Walker and P. Adolph re: Retired Player Licensing [PI132411 - PI132412]	
1050	01/02/2008 Email from A. Manolakas to D. Santos re: Super Bowl Hall of Fame Event [PI132441 - PI132451]	Hearsay
1051	12/07/2006 Email from K. Bush to J. Nodland re: License Agreement renewal [PI114474 - PI114477]	Hearsay
1052	12/08/2006 Email from R. Medina to J. Goodstadt re: USAOPOLY FY08 Licensing Agreement [PI110101]	Completeness
1053	02/25/2005 Email from I. Goldman to L. Lawson re: License Agreement between National Football League Players Incorporated and JAMDAT [PI117250 - PI117251]	Hearsay, Completeness
1054	11/00/2006 Trading Cards and Collectibles Monthly Report [PI102641]	
1055	03/00/2007 Trading Cards and Collectibles Monthly Report [PI002696]	
1056	00/00/0000 Confidential Proposal for Players Inc. Extension - Proposed Terms for Amendment to Existing Agreement [PI113444]	Hearsay
1057	02/28/2007 Email from K. Bush to J. Loeser re: License Agreement renewal [PI122023 - PI122024]	
1058	08/18/2005 Email from J. Nahra to L. Lawson re: Players Inc./Atari, Inc. FY06 [PI117960 - PI117963]	Hearsay, Completeness
1059	01/05/2004 Email from L. Lawson to J. Nahra re: Players Inc. Agreement [PI121526 - PI1215333]	Hearsay
1060	09/09/2003 Email from J. Nahra to L. Matiss, cc: L. Lawson, re: revised agreement Atari 2003 for Players Inc. [PI118043 - PI118046]	Hearsay, Completeness
1061	02/00/2008 Trading Cards and Collectibles Monthly Report [PI134520]	
1062	02/00/2007 Trading Cards and Collectibles Monthly Report [PI102738]	
1063	10/29/2007 Email from S. Sedberry to P. Adolph, cc: D. Koblin, re: Renewal Language [PI108400 - PI108401]	Hearsay
1064	06/08/2004 Email from L. Lawson to L. Lunger re: revised agreement between SCEA and Players Inc. [PI115777]	Completeness

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Exhibit No.	Description	Objection
1065	09/15/2004 Email from L. Lawson to L. Lunger re: revised Players Inc. License Agreement [PI115104 - PI115113]	Hearsay
1066	04/25/2005 Letter from K. Holden to J. Goodstadt re: License Agreement between Players Inc. and Photo File [PI108184 - PI108185]	Hearsay
1067	06/20/2005 Faxed Letter from J. Linzner to C. Walker re: License Extension [PI101753 - PI101755]	Hearsay
1068	03/21/2007 Email from M. Kelly to K. Bush re: renewal of license for NFL trains [PI118351 - PI118353]	Hearsay
1069	03/15/2006 Email from J. Goodstadt to K. Skubick re: License Agreement renewal [PI129423 - PI129426]	Hearsay
1070	08/15/2005 Email from L. Lawson to C. Walker re: NFLPA/CBS SportsLine Licensing Proposal [PI129629 - PI129632]	Hearsay
1071	03/01/2006 License Agreement between Yahoo Inc. and National Football League Players Incorporated [PI007340 - PI007354]	
1072	11/28/2006 Email from K. Bush to D. Allen re: trading card renewal terms [PI114745 - PI114750]	Hearsay
1073	00/00/0000 Letter from D. Allen to D. Mandelbrot re: License Extension Agreement between Yahoo Inc. and National Football League Players Incorporated [PI097744]	
1074	06/24/2005 Email from J. Goodstadt to P. Allen and C. Walker re: Proposal for exclusivity (Activa) [PI112068 - PI112069]	Hearsay
1075	12/07/2006 Email from C. Healy at Healy Awards Inc. to K. Bush re: License Agreement renewal [PI114478 - PI114481]	Hearsay
1076	00/00/0000 Letter from D. Allen to T. Moore re License Agreement extension between National Football League Players Incorporated and ESPN Internet Ventures [PI099341]	
1077	05/02/2006 Email from J. Nahra to T. Moore, cc: F. Golding, re: National Football League Players Incorporated's renewal agreement [PI113705 - PI113706]	Hearsay, Completeness
1078	10/09/2003 Letter from C. Fraelich to P. Adolph re: Request to extend License Agreement [PI097510 - PI097511]	Hearsay
1079	11/19/2007 Email from J. Brenner to K. Bush re: MBI, Inc. license with Players, Inc. [PI100659]	Hearsay

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Exhibit No.	Description	Objection
1080	00/00/0000 Letters from D. Allen to numerous companies re: License Agreement extension between National Football League Players Incorporated and their individual company [PI099340 - PI099346]	Authenticity
1081	05/02/2005 Email from R. Phythian to L. Lawson re: confirmation of renewal [PI120970 - PI120973]	Hearsay, Completeness
1082	03/01/2004 License Agreement between Healy Awards and National Football League Players Incorporated [PI008122 - PI008134]	
1083	03/01/2007 License Agreement between Healy Awards and National Football League Players Incorporated [PI007437 - PI007449]	
1084	04/01/2003 License Agreement between John F. Turner and Company and National Football League Players Incorporated [PI008175 - PI008186]	
1085	03/01/2007 License Agreement between K2 Licensing & Promotions and National Football League Players Incorporated [PI007411 - PI007423]	
1086	03/01/2006 License Agreement between Donruss Playoff Corporation and National Football League Players Incorporated [PI007720 - PI007733]	
1087	03/01/2006 License Agreement between Merrick Mint and National Football League Players Incorporated [PI006022 - PI006035]	
1088	03/01/2006 License Agreement between Original Mini's, Inc. and National Football League Players Incorporated [PI006126 - PI006138]	
1089	03/01/2007 License Agreement between Original Mini's, Inc. and National Football League Players Incorporated [PI006139 - PI006151]	
1090	03/01/2005 License Agreement between PayDay Sports Inc. and National Football League Players Incorporated [PI006167 - PI006179]	
1091	03/01/2005 License Agreement between Peter David and National Football League Players Incorporated [PI006205 - PI006217]	
1092	03/01/2006 License Agreement between Peter David and National Football League Players Incorporated [PI006180 - PI006192]	
1093	03/01/2005 License Agreement between Photo File and National Football League Players Incorporated [PI006246 - PI006258]	

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Exhibit No.	Description	Objection
1094	03/01/2005 License Agreement between Photo File and National Football League Players Incorporated [PI006259 - PI006271]	
1095	03/01/2005 License Agreement between Photo File and National Football League Players Incorporated [PI006272 - PI006283]	
1096	03/01/2003 License Agreement between Pro Specialties Group and National Football League Players Incorporated [PI006321-PI006334]	
1097	03/01/2006 License Agreement between Pro Specialties Group and National Football League Players Incorporated [PI006307-PI006320]	
1098	03/01/2005 License Agreement between Pro Trade, Inc. and National Football League Players Incorporated [PI006335 - PI006347]	
1099	03/01/2006 License Agreement between Pro Trade, Inc. and National Football League Players Incorporated [PI007475 - PI007489]	
1100	03/01/2004 License Agreement between RC2 Brands, Inc. and National Football League Players Incorporated [PI006360 - PI006373]	
1101	03/01/2006 License Agreement between RC2 Brands, Inc. and National Football League Players Incorporated [PI006386 - PI006399]	
1102	03/01/2005 License Agreement between Sababa Toys and National Football League Players Incorporated [PI006556 - PI006569]	
1103	03/01/2006 License Agreement between SC Sports and National Football League Players Incorporated [PI006570 - PI006582]	
1104	03/01/2003 License Agreement between Serious USA and National Football League Players Incorporated [PI006598 - PI006610]	
1105	03/01/2004 License Agreement between Serious USA and National Football League Players Incorporated [PI006611 - PI006623]	
1106	03/01/2004 License Agreement between Sony Computer Entertainment America and National Football League Players Incorporated [PI006624 - PI006637]	
1107	03/01/2006 License Agreement between Specialty Board Games and National Football League Players Incorporated [PI006650 - PI006662]	
1108	03/01/2006 License Agreement between SportsLine.com, Inc. and National Football League Players Incorporated [PI006663 - PI006677]	



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Exhibit No.	Description	Objection
1109	03/01/2006 License Agreement between STATS LLC and National Football League Players Incorporated [PI006781 - PI006793]	
1110	03/01/2005 License Agreement between Team Beans and National Football League Players Incorporated [PI006850 - PI006864]	
1111	03/01/2007 License Agreement between The Northwest Company and National Football League Players Incorporated [PI005985 - PI005997]	
1112	03/01/2007 License Agreement between The Topps Company and National Football League Players Incorporated [PI007368-PI007382]	
1113	03/01/2004 License Agreement between THQ Wireless, Inc. and National Football League Players Incorporated [PI006919 - PI006931]	
1114	03/01/2006 License Agreement between THQ Wireless, Inc. and National Football League Players Incorporated [PI006904 - PI006917]	
1115	03/01/2005 License Agreement between TMP International, Inc. and National Football League Players Incorporated [PI006932 - PI006946]	
1116	03/01/2003 License Agreement between Transport Graphics, Inc. and National Football League Players Incorporated [PI006999 - PI007011]	
1117	03/01/2003 License Agreement between Trends International, Inc. and National Football League Players Incorporated [PI007038 - PI007049]	
1118	03/01/2004 License Agreement between Trends International Inc. and National Football League Players Incorporated [PI007024 - PI007037]	
1119	03/01/2007 License Agreement between Trends International Inc. and National Football League Players Incorporated [PI007327 - PI007339]	
1120	03/01/2006 License Agreement between UPI Marketing, Incorporated and National Football League Players Incorporated [PI007397 - PI007410]	
1121	01/01/2006 License Agreement between Upper Class Collectibles, LLC and National Football League Players Incorporated [PI007050 - PI007062]	

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Exhibit No.	Description	Objection
1122	03/01/2007 License Agreement between USAOPOLY, Inc. and National Football League Players Incorporated [PI007355 - PI007367]	
1123	03/01/2005 License Agreement between VF Imagewear, Inc. and National Football League Players Incorporated [PI007200 - PI007212]	
1124	03/01/2003 License Agreement between Vulcan Sports Media, Inc. d/b/a The Sporting News and National Football League Players Incorporated [PI006878 - PI006891]	
1125	03/01/2006 License Agreement between Vulcan Sports Media, Inc. and National Football League Players Incorporated [PI006865 - PI006877]	
1126	03/01/2003 License Agreement between Wilmington Products USA, Inc. d/b/a The Northwest Company and National Football League Players Incorporated [PI006113 - PI006125]	
1127	03/01/2005 License Agreement between Wilmington Products USA, Inc. d/b/a The Northwest Company and National Football League Players Incorporated [PI006100 - PI006112]	
1128	03/01/2004 License Agreement between Wincraft Inc. and National Football League Players Incorporated [PI007224 - PI007238]	
1129	03/01/2006 License Agreement between Winning Streak Sports, LLC and National Football League Players Incorporated [PI007251 - PI007264]	
1130	02/28/2006 Players Inc.'s Financial Statements 03/01/2005 - 02/28/2006 [PI096027 - PI096055]	Completeness
1132	07/25/2007 Letter from D. Santos to A. Wortzman re: Sterling Sharpe [PI031018 - PI031019]	
1133	03/01/2003 License Agreement between All Sport Entertainment and National Football League Players Incorporated [PI008095 - PI008108]	
1134	03/01/2005 License Agreement between America Online, Inc. and National Football League Players Incorporated [PI007561 - PI007574]	
1135	03/01/2006 License Agreement between American City Business Journals, Inc. d/b/a Sporting News and National Football League Players Incorporated [PI007300 - PI007312]	

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Exhibit No.	Description	Objection
1136	03/01/2006 License Agreement between AOL LLC and National Football League Players Incorporated [PI007549 - PI007560]	
1137	12/01/2005 License Agreement between Boelter Brands, LLC and National Football League Players Incorporated [PI007604 - PI007616]	
1138	03/01/2007 License Agreement between Boelter Brands, LLC and National Football League Players Incorporated [PI007313 - PI007326]	
1139	03/01/2005 License Agreement between Bradford Exchange and National Football League Players Incorporated [PI007617 - PI007628]	
1140	03/01/2005 License Agreement between CDM Fantasy Sports, Inc. and National Football League Players Incorporated [PI007653 - PI007678]	
1141	03/01/2005 License Agreement between Commemorative Tickets.com and National Football League Players Incorporated [PI007679 - PI007691]	
1142	03/01/2005 License Agreement between Dallas Cowboys Merchandising and National Football League Players Incorporated [PI007692 - PI007704]	
1143	03/01/2005 License Agreement between Donruss Playoff Corporation and National Football League Players Incorporated [PI007734 - PI007747]	
1144	03/01/2007 License Agreement between Donruss Playoff Corporation and National Football League Players Incorporated [PI007705 - PI007719]	
1145	03/01/2006 License Agreement between ESPN/Starwave Partners d/b/a ESPN Internet Venture and National Football League Players Incorporated [PI007760 - PI007773]	
1146	03/01/2006 License Agreement between Excalibur Electronics, Inc. and National Football League Players Incorporated [PI007424 - PI007436]	
1147	03/01/2006 License Agreement between F&W Publications, Inc. and National Football League Players Incorporated [PI008021 - PI008033]	
1148	03/01/2003 License Agreement between Fantasy Sports Championships and National Football League Players Incorporated [PI007835 - PI007868]	

Exhibit No.	Description	Objection
1149	03/01/2005 License Agreement between Fox Sports Interactive Media, LLC and National Football League Players Incorporated [PI007983 - PI007995]	
1150	03/01/2006 License Agreement between Fox Interactive Media, Inc. and National Football League Players Incorporated [PI007970 - PI007982]	
1151	03/01/2005 License Agreement between Gracelyn, Inc. and National Football League Players Incorporated [PI008060 - PI008073]	
1152	03/01/2006 License Agreement between Head2Head Sports LLC and National Football League Players Incorporated [PI008109 - PI008121]	
1153	00/00/2003 GLR FY03 Calculation.xls [Native file] [PI095953]	
1154	00/00/2004 GLR FY04 Calculation.xls [Native file] [PI095955]	
1155	00/00/2005 GLR FY05 Calculation.xls [Native file] [PI095954]	
1156	00/00/2006 GLR FY06 Calculation.xls [Native file] [PI095963]	
1157	00/00/2007 GLR FY07 Calculation.xls [Native file] [PI095952]	
1158	00/00/2007 GLR Received thru 11-30-07.xls [Native file] [PI095959]	
1160	09/11/2003 royaltyeligibility2002qualified FY03 Pool.xls [Native file] [PI095961]	
1161	00/00/0000 Royalty2003 Season FY04 pool.xls [Native file] [PI095956]	
1162	09/18/2006 royaltyeligibility2005qualified FY06 Pool.xls [Native file] [PI095957]	
1163	09/05/2007 royaltyeligibility2006qualified FY07 Pool.xls [Native file] [PI095958]	
1164	00/00/0000 Retired Player Group Licensing Authorization Forms [PI027379 - PI030996]	Improper compilation
1165	05/30/2006 Form LM-2 Labor Organization Annual Report for period 03/01/2005 - 02/28/2006 [PI025769 - PI026527]	Completeness
1166	05/31/2007 Form LM-2 Labor Organization Annual Report for period 03/01/2006 - 02/28/2007 [PI026528 - PI027294]	Completeness
1167	12/20/2007 National Football League Players Association's Responses and Objections to Plaintiff's First Set of Interrogatories (with verification of Andre Collins) [No Bates]	

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Exhibit No.	Description	Objection
1168	12/20/2007 National Football League Players Incorporated's Responses and Objections to Plaintiff's First Set of Interrogatories (with verification of Andrew Feffer) [No Bates]	
1169	01/10/2007 National Football League Players Incorporated's Responses and Objections to Plaintiff's Second Set of Interrogatories [No Bates]	
1170	01/22/2007 National Football League Players Incorporated's Responses and Objections to Plaintiff's Third Set of Interrogatories [No Bates]	
1171	01/22/2007 National Football League Players Association's Responses and Objections to Plaintiff's Second Set of Interrogatories [No Bates]	
1172	02/08/2008 Letter from D. Greenspan to R. Hilbert re: supplemental responses to interrogatories 3 - 8 [No Bates]	Completeness
1173	02/27/2008 Defendants' Supplemental Responses and Objections to Plaintiffs' Amended Interrogatories [No Bates]	
1174	05/23/2008 National Football League Players Association's Responses and Objections to Plaintiff's Third Set of Interrogatories [No Bates]	
1175	05/23/2008 Players Inc.'s Responses and Objections to Plaintiffs' Fourth Set of Interrogatories [No Bates]	
1176	08/01/2007 Players Inc.'s Responses and Objections to Plaintiffs' First Set of Requests for Admissions [No Bates]	
1177	08/16/2007 National Football League Players Association's Responses and Objections to Plaintiffs' First Set of Requests for Admissions [No Bates]	
1178	12/10/2007 National Football League Players Association's Responses and Objections to Plaintiffs' Second Set of Requests for Admissions [No Bates]	
1179	12/10/2007 Players Inc.'s Responses and Objections to Plaintiffs' Second Set of Requests for Admission [No Bates]	
1180	05/23/2008 National Football League Players Association's Responses and Objections to Plaintiffs' Third Set of Requests for Admissions [No Bates]	
1181	05/23/2008 Players Inc.'s Responses and Objections to Plaintiffs' Third Set of Requests for Admission [No Bates]	

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Exhibit No.	Description	Objection
1182	02/16/2007 New York Times Article "Upshaw Maintains Royalties Were Distributed Properly" by Alan Schwarz [CLASS003005 - CLASS 003006]	Hearsay
1183	05/31/2001 Letter from L. Lawson to J. Strauser regarding scrambling players' identities for use in video games [PI131529 - PI131530]	Authenticity, best evidence, completeness
1184	08/08/2005 Email from J. Strauser to J. Luhr, cc: R. Ferwerda re: NFL Record book (in Madden) question [EA000153 - EA000156]	Hearsay
1185	00/00/2006 "Development of a Scale to Measure Team Brand Associations in Professional Sport," by Stephen D. Ross, Jeffrey D. James, Patrick Vargas, Journal of Sport Management, 2006, Vol. 20, pages 260-279 [No Bates]	Hearsay, authenticity
1186	00/00/2001 "Building Service brands via social identity: Lessons from the sports marketplace," by Robert Underwood, Edward Bond, Robert Baer, Journal of Marketing Theory and Practice, 2001, Vol. 9, Issue 1 [No Bates]	Hearsay, authenticity
1187	00/00/2005 "Brand management and the challenge of authenticity by Michael Beverland," The Journal of Product Brand Management, 2005, Vol. 14, No. 7, pages 460-461 [No Bates]	Hearsay, authenticity
1188	08/00/2000 "First Wave of Madden Invasion Hits As EA Ships Madden NFL 2001 For the PlayStation," in Market Wire, August, 2000; Game Website, easports.com [No Bates]	Hearsay, authenticity
1189	00/00/2006 "Tailgating, Sacks and Salary Caps: How the NFL Became the Most Successful Sports League in History", by Mark Yost, Chicago: Kaplan Publishing 2006, pages 123-124 [No Bates]	Hearsay, authenticity
1190	04/28/2008 Sports Illustrated cover [No Bates]	Hearsay, completeness, authenticity
1191	11/06/2006 "NBPA trades control of rights for guaranteed \$25M a year", by John Lombardo [No Bates]	Hearsay, authenticity
1192	00/00/2006 The Business of Sports, A Primer for Journalists by Mark Conrad, Mahway: Lawrence Erlbaum Associates, Inc., 2006, page 167 [No Bates]	Hearsay, completeness, authenticity
1193	05/23/2008 mlbplayers.com website: Frequently Asked Questions [No Bates]	Hearsay, authenticity
1194	00/00/2007 Sport Promotion and Sales Management by Irwin et al; Chicago: Human Kinetics, 2007, page 11 [No Bates]	Hearsay, completeness, authenticity

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Exhibit No.	Description	Objection
1195	00/00/2004 The Business of Sports by Rosner, et al; Boston: Jones and Bartlett Publisher, pages 179-180 [No Bates]	Hearsay, completeness, authenticity
1196	00/00/2007 Sport Marketing by Mullin, et al; Champaign: Human Kinetics, 2007, pages 197, 199 [No Bates]	Hearsay, completeness, authenticity
1197	00/00/1999 Unpaid Professionals, Commercialism and Conflict in Big-Time College Sports by Andrew Zimbalist, Princeton University Press, 1999, page 137 [No Bates]	Hearsay, completeness, authenticity
1198	02/26/2007 "Banking on Hoops", by Michael Smith, Street & Smith's Sports Business Journal, 02/26/2007 [No Bates]	Hearsay, authenticity
1199	00/00/2005 Principles and Practice of Sport Management by Masteralexis, et al, Boston: Jones and Bartlett Publisher, 2005, page 71 [No Bates]	Hearsay, completeness, authenticity
1200	00/00/1989 The Theory of Industrial Organization by Tirole, Cambridge: The MIT Press, 1989, page 16 [No Bates]	Hearsay, completeness, authenticity
1201	12/31/2004 Major League Baseball Players Association, Statements of Assets and Liabilities, December 31, 2004 and 2003 [No Bates]	Hearsay, completeness, authenticity
1202	05/05/2008 "MLB Players receive labor peace dividend", by Eric Fisher and Liz Mullen, Street & Smith's Sports Business Journal, 05/05/2008 [No Bates]	Hearsay, authenticity
1203	00/00/2006 "Ricardian or Monopoly Rents? The Perspective of Potential Entrants", by Joseph Shaanan, Eastern Economic Journal, Winter 2006 [No Bates]	Hearsay, authenticity
1204	09/17/2007 "With Famed Players, Game Takes on Madden's Turf", by Seth Schiesel, nytimes.com [No Bates]	Hearsay, authenticity
1205	03/11/2008 "Take-Two gets a lump of coal for holiday quarter" by Brendan Sinclair, GameSpot.com [No Bates]	Hearsay, authenticity
1206	03/11/2008 "Take Two Conference Call Q&A Highlights" by John Jcal Callaham, firingsquad.com [No Bates]	Hearsay, authenticity
1208	05/23/2008 Appendix A (Exhibits) to Expert Report of Daniel A. Rascher [No Bates]	Hearsay
1209	05/23/2008 Appendix B (C.V. for Daniel A. Rascher) to Expert Report of Daniel A. Rascher [No Bates]	Hearsay
1210	05/23/2008 Appendix C (Documents Considered) to Expert Report of Daniel A. Rascher [No Bates]	Hearsay
1211	05/23/2008 Expert Report of Philip Y. Rowley [No Bates]	Hearsay

Exhibit No.	Description	Objection
1212	05/23/2008 Curriculum Vitae of Philip Y. Rowley (Exhibit 1-CV to Expert Report of Philip Y. Rowley) [No Bates]	Hearsay
1213	05/23/2008 Testimony Experience (Exhibit 1 to Expert Report of Philip Y. Rowley) [No Bates]	Hearsay
1214	05/23/2008 Document List of Documents Reviewed (Exhibit 2 to Expert Report of Philip Y. Rowley) [No Bates]	Hearsay
1215	05/23/2008 Damages Summary (Exhibit 3 to Expert Report of Philip Y. Rowley) [No Bates]	Hearsay
1216	05/23/2008 Original NFL GLR Calc., Summary of License Payments Received (Exhibit 4 to Expert Report of Philip Y. Rowley) [No Bates]	Hearsay
1217	05/23/2008 Total Royalty Payments by Year by Licensee (Exhibit 5 to Expert Report of Philip Y. Rowley) [No Bates]	Hearsay
1218	05/23/2008 Royalty Payments Detail (Exhibit 5.1 to Expert Report of Philip Y. Rowley) [No Bates]	Hearsay
1219	05/23/2008 Player Count (Exhibit 6 to Expert Report of Philip Y. Rowley) [No Bates]	Hearsay
1220	05/23/2008 Summary of Retired Player GL (Exhibit 7 to Expert Report of Philip Y. Rowley) [No Bates]	Hearsay
1221	05/23/2008 License Agreements - Subset (Exhibit 8 to Expert Report of Philip Y. Rowley) [No Bates]	Hearsay
1223	06/21/2002 NFL Players Association Retired Player Group Licensing Authorization Form signed by Clifton A. McNeil, Jr. [PI028968]	
1224	04/19/2000 NFL Players Association Retired Player Group Licensing Authorization Form signed by Bruce A. Laird [PI030518]	
1225	01/05/2004 NFL Players Association Retired Player Group Licensing Authorization Form signed by Bruce A. Laird [PI028745]	
1227	00/00/0000 The ESPN Pro Football Encyclopedia (Second Edition) [Physical Exhibit] [No Bates]	Hearsay; Not produced in discovery
1228	Becket 2008 Annual Pricing Guide [Physical Exhibit] [No Bates]	Hearsay; Not produced in discovery
1229	Total Football: The Official Encyclopedia of the National Football League (Second Edition) [Physical Exhibit] [No Bates]	Hearsay; Not produced in discovery



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<b>Exhibit No.</b>	<b>Description</b>	<b>Objection</b>
1230	03/29/1993 Collective Bargaining Agreement between National Football League Management Council and National Football League Players Association (NFLPA) [No Bates]	Authenticity, Completeness, Improper compilation, Hearsay
1231	03/08 2006 Collective Bargaining Agreement between The NFL Management Council and The NFL Players Association [No Bates]	Authenticity, Completeness
1232	Screen shots from EA Sports Madden 2003, PC [No Bates]	Authenticity; Completeness; Improper compilation; Not produced in discovery
1233	Screen shots from EA Sports Madden 2004, PC [No Bates]	Authenticity; Completeness; Improper compilation; Not produced in discovery
1234	Screen shots from EA Sports Madden 2005, PC [No Bates]	Authenticity; Completeness; Improper compilation; Not produced in discovery
1235	Screen shots from EA Sports Madden 2006, PC [No Bates]	Authenticity; Completeness; Improper compilation; Not produced in discovery
1236	Screen shots from EA Sports Madden 2007, PC [No Bates]	Authenticity; Completeness; Improper compilation; Not produced in discovery
1237	Screen shots from EA Sports Madden 2008, PC [No Bates]	Authenticity; Completeness; Improper compilation; Not produced in discovery
1238	00/00/2001 EA Sports Madden 2001, PlayStation 2 [Physical Exhibit] [No Bates]	
1239	00/00/0000 F.R.E. 1006 Summary of Vintage Teams Used in Madden Video Games[No Bates]	Authenticity; Completeness
1240	00/00/0000 F.R.E. 1006 Summary of Retired Players used in EA Sports Madden Video Games [No Bates]	Authenticity; Completeness, Improper compilation
1241	00/00/2002 EA Sports Madden 2002, PlayStation 2 [Physical Exhibit] [No Bates]	
1242	00/00/2002 EA Sports Madden 2002, Xbox [Physical Exhibit] [No Bates]	
1243	00/00/2003 EA Sports Madden 2003, PlayStation 2 [Physical Exhibit] [No Bates]	

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Exhibit No.	Description	Objection
1244	00/00/2003 EA Sports Madden 2003, Xbox [Physical Exhibit] [No Bates]	
1245	00/00/2003 EA Sports Madden 2003, PC CD [Physical Exhibit] [No Bates]	
1246	00/00/2004 EA Sports Madden 2004, PlayStation 2 [Physical Exhibit] [No Bates]	
1247	00/00/2004 EA Sports Madden 2004, Xbox [Physical Exhibit] [No Bates]	
1248	00/00/2004 EA Sports Street2 2004, Nintendo GameCube [Physical Exhibit] [No Bates]	
1249	00/00/2004 EA Sports Madden 2004, PC CD [Physical Exhibit] [No Bates]	
1250	00/00/2005 EA Sports Madden 2005, PlayStation 2 [Physical Exhibit] [No Bates]	
1251	00/00/2005 EA Sports Madden Collector's Edition, PlayStation 2 [Physical Exhibit] [No Bates]	
1252	00/00/2005 EA Sports Madden 2005, Xbox [Physical Exhibit] [No Bates]	
1253	00/00/2005 EA Sports Madden 2005, Nintendo DS [Physical Exhibit] [No Bates]	
1254	00/00/2005 EA Sports Madden 2005, Nintendo GameCube [Physical Exhibit] [No Bates]	
1255	00/00/2005 EA Sports Madden 2005, PC CD [Physical Exhibit] [No Bates]	
1256	00/00/2006 EA Sports Madden 2006, PlayStation 2 [Physical Exhibit] [No Bates]	
1257	00/00/2006 EA Sports Madden 2006, Xbox [Physical Exhibit] [No Bates]	
1258	00/00/2006 EA Sports Madden 2006, PC CD [Physical Exhibit] [No Bates]	
1259	00/00/2007 EA Sports Madden 2007, PlayStation 2 [Physical Exhibit] [No Bates]	
1260	00/00/2007 EA Sports Madden 2007, PlayStation 3 [Physical Exhibit] [No Bates]	
1261	00/00/2007 EA Sports Madden 2007, Xbox [Physical Exhibit] [No Bates]	
1262	00/00/2007 EA Sports Madden 2007, Nintendo GameCube [Physical Exhibit] [No Bates]	
1263	00/00/2007 EA Sports Madden 2007, PC DVD [Physical Exhibit] [No Bates]	
1264	00/00/2008 EA Sports Madden 2008, PlayStation 3 [Physical Exhibit] [No Bates]	
1265	00/00/2008 EA Sports Madden 2008, Xbox [Physical Exhibit] [No Bates]	
1266	00/00/2008 EA Sports Madden 2008, Nintendo DS [Physical Exhibit] [No Bates]	
1267	00/00/2008 EA Sports Madden 2008, PC DVD [Physical Exhibit] [No Bates]	

Exhibit No.	Description	Objection
1268	00/00/2008 EA Sports Madden 2007, Xbox 360 [Physical Exhibit] [No Bates]	
1269	00/00/2009 EA Sports Madden 2009, Xbox 360 [Physical Exhibit] [No Bates]	
1273	06/26/2008 Expert Reply Report of Daniel A. Rascher [No Bates]	Hearsay, Does Not Comply with Court's Expert Disclosure Requirements
1274	06/26/2008 Appendix A (Additional Documents Considered) to Expert Reply Report of Daniel A. Rascher [No Bates]	Hearsay
1275	06/26/2008 Appendix B (Exhibits) to Expert Reply Report of Daniel A. Rascher [No Bates]	Hearsay
1276	06/27/2008 Rebuttal Report of Philip Y. Rowley [No Bates]	Hearsay
1277	06/27/2008 Exhibit 1- IE12 (Damages Summary and backup) to Rebuttal Report of Philip Y. Rowley [No Bates]	Hearsay
1278	06/27/2008 Exhibit 2 (Player Count) to Rebuttal Report of Philip Y. Rowley [No Bates]	Hearsay
1279	06/27/2008 Exhibit 3 (Summary of Retired Player GLA) to Rebuttal Report of Philip Y. Rowley [No Bates]	Hearsay
1280	00/00/0000 Article XIV NFL Player Contract, [No Bates]	Completeness; Authenticity
1281	00/00/0000 Appendix C NFL Player Contract [No Bates]	Completeness; Authenticity
1282	00/00/1987 "Administrative Procedures as Instruments of Political Control" by Mathew D. McCubbins, et al, Journal of Law, Economics and Organization, Vol. 3, No. 2 Fall 1987, pages 243, 247 [No Bates]	Hearsay; Completeness
1283	00/00/1999 "Examining the Importance of Brand Equity in Professional Sport" by James M. Gladden, et al, Sport Marketing Quarterly, Vol. 8, No. 1 1999, page 21 [No Bates]	Hearsay; Completeness
1284	00/00/2002 "Developing an Understanding of Brand Associations in Team Sport: Empirical Evidence from Consumers of Professional Sport" by James M. Gladden, et al, Journal of Sport Management, 16, 2002, pages 54, 68 [No Bates]	Hearsay; Completeness
1285	00/00/1995 "The Effects of Team Loyalty and Selected Stadium Factors on Spectator Attendance" by Kirk L. Wakefield, et al, Journal of Sport Management, 9, 1995, pages 153, 159 [No Bates]	Hearsay; Completeness

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Exhibit No.	Description	Objection
1286	00/00/2001 "Managing North American Major Professional Sport Teams in the New Millennium: A Focus on Building Brand Equity" by James M. Gladden, et al, Journal of Sport Management, 15, 2001, pages 297, 298 [No Bates]	Hearsay; Completeness
1287	00/00/2005 "Customer-based brand equity in the team sport industry, Operationalization and impact on the economic success of sport teams" by Hans H. Bauer, et al, European Journal of Marketing, 39, 5/6, pages 496, 507, 508 [No Bates]	Hearsay; Completeness
1288	00/00/0000 "Implementing Marketable Emissions Permits" by Roger G. Noll, page 120 [No Bates]	Hearsay; Completeness
1289	06/00/1990 "Some Implications of Cognitive Psychology for Risk Regulation" by Roger G. Noll, et al, Journal of Legal Studies, Vol. 19, No. 2, The Law and Economics of Risk [No Bates]	Hearsay
1290	02/09/1996 "NFL approves Browns move" by Larry Weisman, USA Today [No Bates]	Hearsay
1291	01/07/2007 "Flyers go from first to worst in one year" by Don Bostrom, The Morning Call [No Bates]	Hearsay
1292	05/30/2008 "What Makes a Player Marketable?", NFLPlayers.com [No Bates]	Authenticity; Hearsay; Not produced in discovery
1293	06/09/2008 "\$100K club grows with licensing/marketing" by Daniel Kaplan, Street & Smith's Sports Business Journal [No Bates]	Hearsay
1294	00/00/2008 Article V NFL Player Contract, Union Security [No Bates]	Completeness; Authenticity
1295	00/00/2008 Player statistics of Brent Jones, Charlie Joiner, Dwight Clark, Eric Wright, Forrest Gregg, Fred Dean, John Taylor, Kenna Turner, L.C. Greenwood, Len Dawson, Mike Cofer, Ray Childress, Raymond Chester, Roger Craig, Todd Christensen, Too Tall Jones, Pro-Football-Reference.com, [No Bates]	Improper compilation; Completeness; Authenticity
1296	03/28/2004 Annual Review of Players, Inc. [PI141267 - PI141518]	
1297	00/00/2008 NFL Players Association 2008 Annual Report [PI141519 - PI141893]	
1298	3/12/2005 Annual Review of Players, Inc. [PI140504 - PI140568]]	
1299	03/12/2006 Annual Review of Players, Inc. [PI140583 - PI140684]	

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Exhibit No.	Description	Objection
1300	00/00/2007 2007 Board of Player Representatives Meeting March 16-23, 2007, Retired Players Department Report [PI140696 - PI140778]	
1301	00/00/0000 Screen Shots of "scrambled" Bruce Laird from Madden Game [No Bates]	Authenticity; Not produced in discovery
1302	00/00/0000 Screen Shots of "scrambled" Clifton McNeil from Madden Game [No Bates]	Authenticity; Not produced in discovery
1303	00/00/0000 Screen Shots of "scrambled" Herb Adderley from Madden Game [No Bates]	Authenticity; Not produced in discovery
1304	00/00/0000 Screen Shots of "scrambled" Walter Beach from Madden Game [No Bates]	Authenticity; Not produced in discovery
1305	00/00/0000 Retired Player Group Licensing Authorization Forms [CLASS000369 - CLASS000375]; [CLASS000379 - CLASS000385]	Plaintiffs have withdrawn exhibit
1307	00/00/2003 Equal Share Licensing Royalty Distribution Criteria, Royalty Eligibility for 2003, Season Payment During 2004 Season (Eyrich Deposition, Ex. 96A) [PI095964]	
1308	00/00/2004 Equal Share Licensing Royalty Distribution Criteria, Royalty Eligibility for 2004 Season, Payment During 2005 Season (Eyrich Deposition, Ex. 96B) [PI095966]	
1309	00/00/2005 Equal Share Licensing Royalty Distribution Criteria Royalty Eligibility for 2005 Season Payment During 2006 Season (Eyrich Deposition, Ex. 96C) [PI095965]	
1310	00/00/2006 Equal Share Licensing Royalty Distribution Criteria Royalty Eligibility for 2006 Season Payment During 2007 Season (Eyrich Deposition, Ex. 96D) [PI095962]	
1311	00/00/2006 Selected cards from Topps Hall of Fame Tribute, 2006 [Physical Exhibit] [No Bates]	Authenticity; Completeness; Improper compilation; Not produced in discovery
1312	00/00/2006 Selected cards from Topps Chrome Hall of Fame Tribute, 2006 [Physical Exhibit] No Bates]	Authenticity; Completeness; Improper compilation; Not produced in discovery
1313	00/00/2005 Selected cards from Topps Golden Anniversary Golden Greats, 2005 [Physical Exhibit] [No Bates]	Authenticity; Completeness; Improper compilation; Not produced in discovery

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Exhibit No.	Description	Objection
1314	00/00/2004 Selected cards from Topps Fan Favorites Autographs, 2004 [Physical Exhibit] [No Bates]	Authenticity; Completeness; Improper compilation; Not produced in discovery
1315	00/00/2004 Selected cards from Topps Fan Favorites Chrome, 2004 [Physical Exhibit] [No Bates]	Plaintiffs have withdrawn exhibit
1316	00/00/2005 Selected cards from Topps All American Autographs Chrome Refractors, 2005 [Physical Exhibit] [No Bates]	Authenticity; Completeness; Improper compilation; Not produced in discovery
1317	00/00/2005 Selected cards from Topps All American Autographs, 2005 [Physical Exhibit] [No Bates]	Authenticity; Completeness; Improper compilation; Not produced in discovery
1318	00/00/2005 Selected cards from Topps Chrome Golden Anniversary Golden Greats, 2005 [Physical Exhibit] [No Bates]	Authenticity; Completeness; Improper compilation; Not produced in discovery
1319	00/00/2004 Selected cards from Topps Fan Favorites, 2004 [Physical Exhibit] [No Bates]	Authenticity; Completeness; Improper compilation; Not produced in discovery

Date: September 25, 2008

DEWEY & LEBOEUF LLP

BY:         /s/ Jason Clark          
Jason Clark  
*Attorneys for Defendants*