

Exhibit Q
to the Joint Pretrial Order

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Attorneys for Defendants National Football League Players Association
and National Football League Players Incorporated d/b/a Players Inc

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

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

Case No. C 07 0943 WHA

DEFENDANTS' WITNESS LIST

Plaintiffs,

v.

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

Defendants.

1 Named Plaintiffs

- 2 1. Herbert Anthony Adderley
3 2. Bernard Paul Parrish

4 Officers or Employees of Defendants' Licensees

5 The following individuals are officers or employees of third-party licensees that
6 have done business with Players Inc and/or the NFLPA and will testify on the subject of their
7 respective licensing agreements with Players Inc and/or the NFLPA, and their licensing
8 practices with Players Inc.

- 9 3. Joel Linzner, Electronic Arts Inc.
10 4. Linda Castillon, Fathead, LLC
11 5. Steve Byrd, STATS, Inc.
12 6. Christine Finch or Todd McFarlane, Todd McFarlane Productions
13 7. Warren Friss, Topps Company
14 8. Adam Zucker, Topps Company
15 9. Adam Sullins, The Upper Deck Company

16 Retired NFL Players Who Signed Retired Player GLAs

17 The following individuals are retired NFL players who signed Retired Player
18 GLAs and will testify to their understandings of the Retired Player GLAs and their individual
19 licensing and marketing experiences.

- 20 10. Walter Beach III
21 11. Andre Collins

- 22 ● In addition, as the Director of the NFLPA Retired Players
23 Department, Mr. Collins will testify as to the information and
24 benefits that the NFLPA made available to its retired player
25 members, including Mr. Parrish.

- 26 12. Dan Goich
27 13. Bruce Laird
28 14. Willie Lanier

1 15. Michael McBath

2 16. Clifton A. McNeil, Jr.

3 Former Officers of the NFLPA

4 The following individuals are retired NFL players who have served as officers
5 of the NFLPA and on the NFLPA Board of Player Representatives, and will testify about the
6 role and function of the NFLPA Board of Player Representatives, the determination of the
7 active player eligibility criteria for payments from the GLR pool, the retention of licensing
8 revenues by the NFLPA and Players Inc, Players Inc's role in utilizing licensing revenues to
9 support the activities of the NFLPA, the distribution of licensing revenues to active and
10 retired players, various agreements between the NFLPA and Players Inc, and their individual
11 licensing and marketing experiences as active and retired NFL players.

12 17. Trace Armstrong

13 18. Tim Brown

14 Current or Former Employees of Defendants

15 The following individuals are current or former employees of Defendants, and
16 will testify about the role and function of the NFLPA and Players Inc, how Players Inc
17 supports the activities of the NFLPA, Defendants' license agreements, the creation, meaning,
18 and use of the Retired Player GLA, the distribution of licensing revenues to active and retired
19 players, the retention of licensing revenues by the NFLPA and Players Inc, various
20 agreements between the NFLPA and Players Inc, Defendants' efforts to market retired
21 players, the negotiation and operation of ad hoc license agreements for retired players, and
22 the nature of the marketplace demand for retired players' licensing rights.

23 19. Doug Allen

24 20. Patricia Allen

25 21. Richard Berthelsen

26 22. Muneer Moore

27 23. Joseph Nahra

28 24. Howard Skall

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25. Gene Upshaw

Defendants' Outside Accountant and Counsel

The following individuals are Defendants' outside accountant and counsel, respectively, and will testify about Players Inc's creation, role and purpose, the existence or non-existence of any "escrow" account, the GLR pool, various agreements between the NFLPA and Players Inc, various accounting and financial matters, and the distribution and allocation of Defendants' licensing revenues.

26. Glenn Eyrich

27. Steve Saxon

Defendants' Experts

The following individuals are experts retained by Defendants in this case, and will testify on the following subjects:

28. G. Steve Jizmagian

- Mr. Jizmagian will testify in response to the testimony of Philip Y. Rowley, one of Plaintiffs' proffered experts, and the subjects covered in his expert report.

29. Dr. Roger G. Noll

- Dr. Noll will testify in response to the testimony of Dr. Daniel A. Rascher, one of Plaintiffs' proffered experts, and the subjects covered in his expert report.

Date: October 8, 2008

DEWEY & LEBOEUF LLP

BY: /s/ Jeffrey L. Kessler

Jeffrey L. Kessler
Attorneys for Defendants