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

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

23 Plaintiffs,

24 v.

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

27 Defendants.
28

Case No. C 07 0943 WHA

**DECLARATION OF DAVID
GREENSPAN IN SUPPORT OF
DEFENDANTS' OPPOSITIONS TO
PLAINTIFFS' MOTIONS IN LIMINE
NO. 1 THROUGH 10**

DECLARATION OF DAVID GREENSPAN

I, David Greenspan, hereby declare as follows:

1. I am an attorney with Dewey & LeBoeuf LLP, attorneys for Defendants National Football League Players Association (“NFLPA”) and National Football League Players Incorporated d/b/a Players Inc (“Players Inc”) in this action. I am a member of the bar of the State of New York and my pro hac vice application in this matter was granted by the Court on August 3, 2007. I make this Declaration in support of Defendants’ Oppositions to Plaintiffs’ Motions in Limine No. 1 through 10. I have personal knowledge of each of the facts stated herein, and if called to testify, could and would testify completely hereto.

2. Attached hereto as Exhibit 1 are true and correct copies of excerpts of the transcript of the deposition of Herbert Adderley, dated February 20, 2008.

3. Attached hereto as Exhibit 2 are true and correct copies of excerpts from the transcript of the deposition of Bernard Parrish, dated March 13, 2008.

4. Attached hereto as Exhibit 3 are true and correct copies of excerpts from the transcript of the deposition of Walter Beach III, dated August 20, 2008.

5. Attached hereto as Exhibit 4 is a true and correct copy of a document produced by Plaintiffs, Bates numbered CLASS002713-2718, which was marked as Ex. 166 at the deposition of Patricia Allen.

6. Attached hereto as Exhibit 5 is a true and correct copy of a document produced by Plaintiffs, Bates numbered CLASS003161, which was marked as Ex. 377 at the deposition of Bernard Parrish.

7. Attached hereto as Exhibit 6 is a true and correct copy of a document produced by Plaintiffs, Bates numbered CLASS003725, which was marked as Ex. 2384 at the deposition of Bruce Laird.

8. Attached hereto as Exhibit 7 is a true and correct copy of a document produced by Plaintiffs, Bates numbered CLASS003005-3006.

9. Attached hereto as Exhibit 8 is a true and correct copy of Plaintiffs’ Supplemental Responses and Objections to Defendants’ Fourth Set of Interrogatories, dated June

1 3, 2008.

2 10. Attached hereto as Exhibit 9 is a true and correct copy of a letter from Joseph
3 Wetzel to Ryan Hilbert, dated August 29, 2007.

4 11. Attached hereto as Exhibit 10 are true and correct copies of excerpts of the
5 transcript of the deposition of Eugene Upshaw, dated February 13, 2008.

6 12. Attached hereto as Exhibit 11 is a true and correct copy of an excerpt of
7 Defendant National Football League Players Association's Responses and Objections to
8 Plaintiffs' Third Request for Production of Documents, dated April 14, 2008.

9 13. Attached hereto as Exhibit 12 is a true and correct copy of an excerpt of
10 Defendant Players Inc's Responses and Objections to Plaintiffs' Second Request for Production
11 of Documents, dated April 14, 2008.

12 14. Attached hereto as Exhibit 13 is a true and correct copy of a letter from Jason
13 Clark to Ryan Hilbert, dated May 20, 2008.

14 15. Attached hereto as Exhibit 14 is a true and correct copy of a letter from Jason
15 Clark to Lewis LeClair, dated June 2, 2008.

16 16. Attached hereto as Exhibit 15 is a true and correct copy of a letter from Brett
17 Charhon to Jason Clark, dated June 4, 2008.

18 17. Attached hereto as Exhibit 16 is a true and correct copy of a document
19 produced by Defendants in this case, Bates numbered PI090965-PI091012, which was marked as
20 Exhibit 99 at the deposition of Glenn Eyrich.

21 18. Attached hereto as Exhibit 17 is a true and correct copy of the Preamble to the
22 NFL Collective Bargaining Agreement, dated March 8, 2006.

23 I declare under penalty of perjury under the laws of the United States of America
24 that the foregoing is true and correct.

25
26 Dated: October 8, 2008

27 /s/ David Greenspan
David Greenspan

Filer's Attestation: Pursuant to General Order No. 45, Section X(B) regarding signatures, Ryan S. Hilbert hereby attests that concurrence in the filing of this document has been obtained.