

EXHIBIT 11

Case No. C 07 0943 WHA

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

Dewey & LeBoeuf LLP
One Embarcadero Center, Suite 400
San Francisco, California 94111

1 Mark Malin (Bar No. 199757)
2 *mmalin@dl.com*
3 DEWEY & LEBOEUF LLP
4 1950 University Avenue, Suite 500
5 East Palo Alto, CA 94303
6 Tel: (650) 845-7000; Fax: (650) 845-7333

7 Jeffrey L. Kessler (*pro hac vice*)
8 *jkessler@dl.com*
9 David G. Feher (*pro hac vice*)
10 *dfeher@dl.com*
11 Eamon O'Kelly (*pro hac vice*)
12 *eokelly@dl.com*
13 DEWEY & LEBOEUF LLP
14 1301 Avenue of the Americas
15 New York, NY 10019
16 Tel: (212) 259-8000; Fax: (212) 259-6333

17 Kenneth L. Steinthal (*pro hac vice*)
18 *kenneth.steinthal@weil.com*
19 WEIL, GOTSHAL & MANGES LLP
20 201 Redwood Shores Parkway
21 Redwood Shores, CA 94065
22 Tel: (650) 802-3000; Fax: (650) 802-3100

23 Bruce S. Meyer (*pro hac vice*)
24 *bruce.meyer@weil.com*
25 WEIL, GOTSHAL & MANGES LLP
26 767 Fifth Avenue
27 New York, NY 10153
28 Tel: (212) 310-8000; Fax: (212) 310-8007

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,

Plaintiffs,

v.

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

Defendants.

Case No. C 07 0943 WHA

NATIONAL FOOTBALL LEAGUE
PLAYERS ASSOCIATION'S
RESPONSES AND OBJECTIONS TO
PLAINTIFFS' THIRD REQUEST
FOR PRODUCTION OF
DOCUMENTS

1 **RESPONSE TO DOCUMENT REQUEST NO. 32**

2 Subject to and without waiver of the foregoing objections, the NFLPA will
3 produce any bylaws of the NFLPA or Players Inc that were in effect in the period from February
4 14, 2003 to the present.

5 **DOCUMENT REQUEST NO. 33**

6 All draft agreements, correspondence and/or communications between the
7 NFLPA, the NFL and/or PLAYERS INC that relate to the negotiation, drafting or execution of
8 the NFL Sponsorship and Internet Agreement.

9 **RESPONSE TO DOCUMENT REQUEST NO. 33**

10 The NFLPA objects to Request No. 33 on the grounds that it is overly broad,
11 unduly burdensome and seeks documents that are neither relevant nor reasonably calculated to
12 lead to the discovery of admissible evidence. The referenced agreements do not involve the
13 licensing of retired player group licensing rights, and the only connection between these
14 agreements and retired players is that NFL Properties and Players Inc subsequently adopted a
15 practice that certain monies paid to retired players by Players Inc under other agreements could
16 be applied against the accounting "Active Usage Credit" referenced in Paragraph 14 of the NFL
17 Sponsorship Agreement. Subject to and without waiver of the foregoing objections, the NFLPA
18 will produce any documents evidencing the adoption of that practice.

19 **DOCUMENT REQUEST NO. 34**

20 All draft agreements, correspondence and/or communications between the
21 NFLPA and/or PLAYERS INC, or between either of them and any third party, that relate to the
22 negotiations, drafting or execution of the March 1, 2000 agreement between the NFLPA and
23 PLAYERS INC.

24 **RESPONSE TO DOCUMENT REQUEST NO. 34**

25 The NFLPA objects to Request No. 34 on the grounds that it is overly broad,
26 unduly burdensome and seeks documents that are neither relevant nor reasonably calculated to
27 lead to the discovery of admissible evidence to the extent it calls for documents unrelated to
28 group licensing programs for retired players or retired player licensing. Subject to and without

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1 of the foregoing objections, the NFLPA will produce documents responsive to Request No. 46 to
2 the extent and at an appropriate time as provided in the above-referenced rules and orders.

3 **DOCUMENT REQUEST NO. 47**

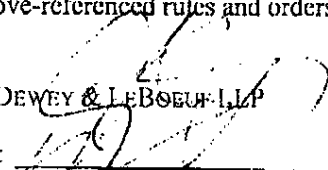
4 All documents prepared by any expert witness or consultant retained in
5 connection with this matter.

6 **RESPONSE TO DOCUMENT REQUEST NO. 47**

7 The NFLPA objects to Request No. 47 on the grounds that it is overly broad and
8 unduly burdensome to the extent that it seeks documents or information beyond that required by
9 the Federal Rules of Civil Procedure, Local Rules, Judge Alsup's Supplemental Order or other
10 applicable rules or Order of this Court. The NFLPA further objects to Request No. 47 on the
11 ground that it is premature at this stage of the litigation. The NFLPA further objects to Request
12 No. 47 to the extent that it calls for documents protected by the attorney-client privilege, work
13 product immunity or any other applicable privilege or immunity. Subject to and without waiver
14 of the foregoing objections, the NFLPA will produce documents responsive to Request No. 47 to
15 the extent and at an appropriate time as provided in the above-referenced rules and orders.

16 Date: April 14, 2008

DEWEY & LEBOEUF LLP

17 BY: 
18 David G. Feher

19 Attorneys for Defendant NFLPA
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