

# **EXHIBIT 12**

**Case No. C 07 0943 WHA**

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

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17 Attorneys for Defendant National Football League Players  
Incorporated d/b/a Players Inc,

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

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

22 Plaintiffs,

23 v.

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

27 Defendants.  
28

Case No. C 07 0943 WHA

PLAYERS INC'S RESPONSES AND  
OBJECTIONS TO PLAINTIFFS'  
SECOND REQUEST FOR  
PRODUCTION OF DOCUMENTS

1 **RESPONSE TO DOCUMENT REQUEST NO. 30**

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

5 **DOCUMENT REQUEST NO. 31**

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. 31**

10 Players Inc objects to Request No. 31 on the grounds that it is overly broad,  
11 unduly burdensome and seeks documents that are neither relevant nor reasonably calculated to  
12 the discovery of admissible evidence. The referenced agreements do not involve the licensing  
13 of retired player group licensing rights, and the only connection between these agreements and  
14 retired players is that NFL Properties and Players Inc subsequently adopted a practice that certain  
15 monies paid to retired players by Players Inc under other agreements could be applied against the  
16 accounting "Active Usage Credit" referenced in Paragraph 14 of the NFL Sponsorship  
17 Agreement. Subject to and without waiver of the foregoing objections, Players Inc will produce  
18 any documents evidencing the adoption of that practice.

19 **DOCUMENT REQUEST NO. 32**

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. 32**

25 Players Inc objects to Request No. 32 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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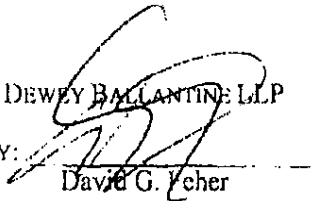
1 DOCUMENT REQUEST NO. 45

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

4 RESPONSE TO DOCUMENT REQUEST NO. 45

5 Players Inc objects to Request No. 45 on the grounds that it is overly broad and  
6 unduly burdensome to the extent that it seeks documents or information beyond that required by  
7 the Federal Rules of Civil Procedure, Local Rules, Judge Alsup's Supplemental Order or other  
8 applicable rules or Order of this Court. Players Inc further objects to Request No. 45 on the  
9 ground that it is premature at this stage of the litigation. Players Inc further objects to Request  
10 No. 45 to the extent that it calls for documents protected by the attorney-client privilege, work  
11 product immunity or any other applicable privilege or immunity. Subject to and without waiver  
12 of the foregoing objections, Players Inc will produce documents responsive to Request No. 45 to  
13 the extent and at an appropriate time as provided in the above-referenced rules and orders.

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15 Date: April 14, 2008

16 DEWEY BALLANTINE LLP  
17 BY:   
18 David G. Yeher

19 Attorneys for Defendant Players Inc  
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