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*Attorneys for Plaintiffs*

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT  
 SAN FRANCISCO DIVISION

BERNARD PAUL PARRISH, HERBERT  
 ANTHONY ADDERLEY, and WALTER  
 ROBERTS III, on behalf of themselves and  
 all others similarly situated,

Plaintiffs,

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

Defendants.

CIVIL ACTION NO. C07 0943 WHA  
**PLAINTIFFS' OBJECTIONS TO  
 DEFENDANTS' TRIAL EXHIBITS**

**PLAINTIFFS' OBJECTIONS TO DEFENDANTS' TRIAL EXHIBITS**

Plaintiffs expressly reserve the right to augment, or otherwise modify their objections to Defendants' exhibits 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. Per the parties' agreement, Plaintiffs further reserve their right to object to Defendants' exhibits under Fed. R. Evid. 402 and 403 and for lack of foundation.

Ex. No.	Description	Objections	Response	Court's Ruling
151	03/08/2006 Email from Wyman to Moore re FW: H. Adderley (Skall Deposition, Ex. 151) <b>[No Bates]</b>	<b>Hearsay:</b> This exhibit contains statements of Defendants' employees. Those statements are hearsay that do not fall within an exception.		
160	00/00/0000 "About Us," from RFPFJ Website (Adderley Deposition, Ex. 160) <b>[CLASS000331-CLASS000332]</b>	<b>403:</b> This exhibit referencing the Retired Professional Football Players for Justice includes references to class counsel and Bernie Parrish, and has no probative value. Referencing this exhibit would be a waste of time, and may require Plaintiffs to present argument on collateral issues to rebut any inferences raised by this exhibit.		
161	00/00/0000 RFPFJ Articles of Incorporation (Adderley Deposition, Ex. 161) <b>[CLASS000317 - CLASS000332]</b>	<b>402/403:</b> The Retired Professional Football Players for Justice Articles of Corporation is not relevant to any issues in this lawsuit, and has no probative value. Referencing this exhibit would be a waste of time, and may require Plaintiffs to present argument on collateral issues to rebut any inferences raised by this exhibit.		

Ex. No.	Description	Objections	Response	Court's Ruling
162	03/09/2007 Email from Adderley to HeroesofFootball re: Check Out Our Website – www.playersforjustice.org (Adderley Deposition, Ex. 162) [CLASS002722 - CLASS002723]			
164	06/09/2007 Email String between Adderley, Parrish, and HeroesofFootball re: Retired NFL Players, More from Profootballtalk.com (Adderley Deposition, Ex. 164) [CLASS002847 - CLASS002848]	<p><b>Hearsay:</b> Neither J. Turney nor Bernie Parrish is a class representative, and their statements are hearsay that do not fall within an exception.</p> <p><b>403:</b> This document contains inflammatory statements that should be excluded, considering the minimal probative value of this exhibit.</p>		

Ex. No.	Description	Objections	Response	Court's Ruling
166	00/00/0000 Communication from Parrish re RFPFJ (Adderley Deposition, Ex. 166) <b>[CLASS002713 - CLASS0002718]</b>	<p>This exhibit consists of multiple documents, which Plaintiffs will address separately:</p> <p><u>CLASS2713-2716:</u> <b>Hearsay:</b> This document includes statements of Bernie Parrish.</p> <p><b>403:</b> This document includes inflammatory statements with no probative value, and should be excluded.</p> <p><u>CLASS2717:</u> No objection.</p> <p><u>CLASS2718:</u> <b>Hearsay:</b> This document includes statements of Bernie Parrish.</p> <p><b>403:</b> This document includes inflammatory statements with no probative value, and should be excluded.</p>		
169	11/15/2007 Third Amended Complaint (Adderley Deposition, Ex. 169) <b>[No Bates]</b>	<b>403:</b> This document includes references to claims that have been dismissed by the Court, including those brought by Bernie Parrish, which will confuse the jury. Plaintiffs will withdraw the objection if Defendants redact any references to claims that have been dismissed by the Court.		

Ex. No.	Description	Objections	Response	Court's Ruling
176	02/04/2008 Plaintiffs' Objections and Responses to Defendants' First Set of Interrogatories, with Parrish Verification (Adderley Deposition, Ex. 176) <b>[No Bates]</b>	<p><b>403:</b> This exhibit contains numerous legal objections to the scope of content of the interrogatories, which could confuse the jury. Plaintiffs will withdraw this objection if those objections are redacted.</p> <p><b>Parrish Verification:</b> As Parrish is no longer a party to this action, the inclusion of Bernie Parrish's verification could confuse the jury, and Plaintiffs object to that part of this exhibit under rule 403. Furthermore, Bernie Parrish's verification of these interrogatories is hearsay.</p>		
177	02/13/2008 Verification of Adderley for Plaintiffs' Objections and Responses to First Set of Interrogatories (Adderley Deposition, Ex. 177) <b>[No Bates]</b>			
179	02/23/2007 First Amended Complaint (Adderley Deposition, Ex. 179) <b>[No Bates]</b>	<p><b>403:</b> This document includes references to claims that have been dismissed by the Court, including those brought by Bernie Parrish, which will confuse the jury. Plaintiffs will withdraw the objection if Defendants redact any references to claims that have been dismissed by the Court.</p>		

Ex. No.	Description	Objections	Response	Court's Ruling
180	06/21/2007 Second Amended Complaint (Adderley Deposition, Ex. 180) <b>[No Bates]</b>	<b>403:</b> This document includes references to claims that have been dismissed by the Court, including those brought by Bernie Parrish, which will confuse the jury. Plaintiffs will withdraw the objection if Defendants redact any references to claims that have been dismissed by the Court.		
181	02/04/2008 Plaintiffs' Responses to Defendants' First Set of Requests for Admission (Adderley Deposition, Ex. 181) <b>[No Bates]</b>	<b>403:</b> This exhibit contains numerous legal objections to the scope of content of the interrogatories, which could confuse the jury. Plaintiffs will withdraw this objection if those objections are redacted.		
307	00/00/0000 RPFPJ Website: Press Releases (M. Parrish Deposition, Ex. 307) <b>[JUSTICE000207 - JUSTICE000209]</b>	<b>402/403:</b> This exhibit is a press release about the lawsuit generally, and is not relevant to the merits of the class's claims. The press release references class counsel and Bernie Parrish, and has no probative value. Referencing this exhibit would be a waste of time, and may require Plaintiffs to present argument on collateral issues to rebut any inferences raised by this exhibit.		

Ex. No.	Description	Objections	Response	Court's Ruling
310	03/22/2007 Email from Parrish re: Chance to Vote Against Gene Upshaw et al., Join Today (M. Parrish Deposition, Ex. 310) [JUSTICE000182 - JUSTICE000185]	<b>Hearsay:</b> Bernie Parrish is not a class representative, and his statements are hearsay that do not fall within an exception.  <b>402/403:</b> This exhibit includes inflammatory statements about Defendants' employees (referencing "Gene Upshaw and his gang"), and should be excluded, especially in light of its lack of probative value to the merits of this case.		
311	00/00/0000 RFPJ Membership Form (M. Parrish Deposition, Ex. 311) [JUSTICE000064 ]	<b>402/403:</b> This exhibit is a membership form for the Retired Professional Players for Justice group, and is wholly irrelevant to the issues in this litigation. This exhibit includes inflammatory statements about Defendants' employees (referencing "Gene Upshaw and his gang"), and should be excluded, especially in light of its lack of probative value to the merits of this case.		

Ex. No.	Description	Objections	Response	Court's Ruling
315	02/14/2007 Letter from Mutch to Marquez re: Retired Professional Football Players For Justice, Inc. (M. Parrish Ex. 315) [JUSTICE000018]	<p><b>Hearsay:</b> Mr. Mutch is not a class representative, and his statements are hearsay.</p> <p><b>402/403:</b> The content of this letter is about the incorporation of The Retired Professional Football Players for Justice Articles, and is not relevant to any issues in this lawsuit. Referencing this exhibit would be a waste of time, and may require Plaintiffs to present argument on collateral issues to rebut any inferences raised by this exhibit.</p> <p><b>Authentication:</b> The letter must be authenticated before Defendants can admit this into evidence.</p>		
316	RFPFJ Articles of Incorporation (M. Parrish Deposition, Ex. 316) [No Bates]	<p><b>402/403:</b> The Retired Professional Football Players for Justice Articles of Corporation is not relevant to any issues in this lawsuit, and has no probative value. Referencing this exhibit would be a waste of time, and may require Plaintiffs to present argument on collateral issues to rebut any inferences raised by this exhibit.</p>		
321	00/00/0000 RFPFJ Website: Officers and Directors (M. Parrish Deposition, Ex. 321) [JUSTICE000218 - JUSTICE000219]	<p><b>403:</b> There is minimal probative value in understanding the membership structure of the RFPFJ. This exhibit may confuse the jury, as it lists class counsel on its membership page. In light of its minimal probative value, the Court should exclude this exhibit under Rule 403.</p>		

Ex. No.	Description	Objections	Response	Court's Ruling
350	07/24/2006 Email from Parrish to Retired Players re: A Few Complaints That Have Been Sent to Government Agencies, State Attorney Generals, and Congressman (Parrish Deposition, Ex. 350) <b>[No Bates]</b>	<b>Hearsay:</b> Mr. Parrish's statements are hearsay.  <b>403:</b> This exhibit includes inflammatory statements (referencing "actuarial bull shit," "goon squad," and "Gene Upshaw and his gang"), and should be excluded, especially in light of its lack of probative value to the merits of this case.		
351	07/17/2007 Email from Arnett to Parrish re: Lets Join Forces on Class Action Suit (Parrish Deposition, Ex. 351) <b>[CLASS003220]</b>	<b>Hearsay:</b> Mr. Arnett is not a class representative, and his statements are hearsay.  <b>403:</b> This exhibit includes inflammatory statements (referencing "kick their asses," "puppet," and "they drink at the same trough"), and should be excluded, especially in light of its lack of probative value to the merits of this case.		
352	08/14/2006 Email from Parrish to Retired Players re: Original Open Letter to Troy Vincent NFLPA Pres. (Parrish Deposition, Ex. 352) <b>[No Bates]</b>	<b>Hearsay:</b> Mr. Parrish's statements are hearsay.  <b>403:</b> This exhibit includes inflammatory statements (referencing "man of color" and other racial statements), and should be excluded, especially in light of its lack of probative value to the merits of this case.		
353, 353A	10/9/2006 Letter from Mutch to Yablonski re: Addendum to Parrish Response to 8/29/2006 Letter (Parrish Deposition, Ex. 353, 353A) <b>[No Bates]</b>	<b>Hearsay:</b> Mr. Parrish's and Mr. Mutch's statements are hearsay.  <b>402/403:</b> Mr. Parrish's position regarding any lawsuits filed against him is irrelevant to any issues remaining in this lawsuit.		

Ex. No.	Description	Objections	Response	Court's Ruling
354	00/00/0000 NFLPA Understating Income ?? Prevaricating and Covering Tracks (Parrish Deposition, Ex. 354) <b>[CLASS002703 - CLASS002711]</b>	<b>Hearsay:</b> Mr. Parrish's statements are hearsay.  <b>403:</b> This exhibit includes inflammatory statements (including professional attacks on Defendants' attorneys), and should be excluded, especially in light of its lack of probative value to the merits of this case.		
355	08/2/2006 Email from Smith to Retired Players re: Here Is an Email I Sent to Andre Collins When I Started Back in 2006 (Parrish Deposition, Ex. 355) <b>[No Bates]</b>	<b>Hearsay:</b> Mr. Pivec, Mr. Smith, and Mr. Parrish are not class representatives, and their statements are hearsay.  <b>403:</b> This exhibit includes inflammatory statements (including comparisons between Mr. Upshaw and Saddam Hussein, Milosevic, and Stalin), and should be excluded, especially in light of its lack of probative value to the merits of this case.		
356	02/20/2007 Email from Parrish to Dobler re: Be On Our Board Would (Parrish Deposition, Ex. 356) <b>[CLASS003718 - CLASS9003719]</b>	<b>Hearsay:</b> Mr. Dobler and Mr. Parrish are not class representatives, and their statements are hearsay.  <b>402/403:</b> This exhibit references the filing of the lawsuit itself, and is irrelevant to the merits of the remaining claims. This exhibit includes inflammatory statements (including "Upshaw is dead meat" and calling Mr. Upshaw "garbage"), and should be excluded, especially in light of its lack of probative value to the merits of this case.		

Ex. No.	Description	Objections	Response	Court's Ruling
357	11/18/2007 Email from Charles Parrish to Parrish re: NFLPA RICO Racket? (Parrish Deposition, Ex. 357) <b>[CLASS003053 - CLASS003093]</b>	<b>Hearsay:</b> Mr. Charles Parrish, Mr. Buoniconti, and Mr. Bernie Parrish are not class representatives, and their statements are hearsay.  <b>402/403:</b> This exhibit includes inflammatory statements (including calling Mr. Upshaw a "thuggish dictator"), and should be excluded, especially in light of its lack of probative value to the merits of this case.		
358	10/13/2007 Email from Charles Parrish to Parrish re: NFLPA (Parrish Deposition, Ex. 358) <b>[CLASS003172 - CLASS003173]</b>	<b>Hearsay:</b> Mr. Charles Parrish and Mr. Bernie Parrish are not class representatives, and their statements are hearsay.  <b>402/403:</b> This exhibit includes inflammatory statements (including references to Defendants' employees as "thugs" and references to brainwashing), and should be excluded, especially in light of its lack of probative value to the merits of this case.		
359	09/18/2007 Article Entitled "Victims of Self Neglect" by Jason Cole (Parrish Deposition, Ex. 359) <b>[[No Bates]</b>	<b>Third-party news article:</b> This article contains statements that are hearsay.  The article must be authenticated before Defendants can admit this into evidence.		

Ex. No.	Description	Objections	Response	Court's Ruling
360	10/28/2007 Email from Parrish to Retired Players re: The Retired Player Issue Are Not Going Away (Parrish Deposition, Exhibit 360) <b>[No Bates]</b>	<b>Hearsay:</b> Mr. Bernie Parrish is not a class representative, and his statements are hearsay.  <b>402/403:</b> This exhibit includes inflammatory statements (including threats of potential lawsuits, and a characterization of Mr. Upshaw as a “bible-thumping money grubbing hypocrite”), and should be excluded, especially in light of its lack of probative value to the merits of this case.		
362	11/07/2007 Email from Lynch to Parrish re: Parrish Documents (Parrish Deposition, Ex. 362) <b>[CLASS003160]</b>	<b>Hearsay:</b> Mr. Parrish’s and Mr. Lynch’s statements are hearsay.  <b>402/403:</b> This exhibit references documents filed in this lawsuit, and does not include admissible evidence relating to the merits of the remaining claims.		
363	12/15/2007 Email from Lynch to Parrish re: Does This Come Through As One Document Or Does The Audit Overlay It (Parrish Deposition, Ex. 363) <b>[CLASS003152 - CLASS003158]</b>	<b>Hearsay:</b> Mr. Parrish’s and Mr. Lynch’s statements are hearsay.  <b>402/403:</b> This exhibit includes inflammatory statements (including a characterization of Mr. Upshaw as a “control freak,” and characterizing those that work for him as “scurry[ing] around” and “licking [him],”), and should be excluded, especially in light of its lack of probative value to the merits of this case.		

Ex. No.	Description	Objections	Response	Court's Ruling
366	11/20/2006 Email from Pyle to Retired Players re: Bernie Parrish Stuff (Parrish Deposition, Ex. 366) <b>[No Bates]</b>	<b>Hearsay:</b> Mr. Parrish's, Mr. Pyle's, and Mr. Stabler's statements are hearsay.  <b>402/403:</b> This exhibit references documents gathered for this lawsuit, and does not include admissible evidence relating to the merits of the remaining claims.		
369	01/24/2007 Email from Parrish to Dobler re: Great Job (Parrish Deposition, Ex. 369) <b>[CLASS004139 - CLASS004169]</b>	<b>Hearsay:</b> Mr. Parrish's and Mr. Dobler's statements are hearsay.  <b>402/403:</b> This exhibit references addresses a potential unrelated lawsuit, and also includes inflammatory racial comments in relation to Mr. Uphsaw, and does not include admissible evidence relating to the merits of the remaining claims. In light of its lack of probative value, the Court should exclude this exhibit.		
370	01/29/2007 Email from Parrish to Toner re: I Believe Item #9 Is a Criminal Offense That Occurred in the Hockey Union's Case Against Eagelson (Parrish Deposition, Ex. 370) <b>[CLASS004220 - CLASS004250]</b>	<b>Hearsay:</b> Mr. Parrish's statements are hearsay.  <b>402/403:</b> This exhibit includes inflammatory statements (including a characterization of an employee as a "leashed pet," and various racial statements), and should be excluded, especially in light of its lack of probative value to the merits of this case.		

Ex. No.	Description	Objections	Response	Court's Ruling
371	02/14/2007 Complaint (Parrish Deposition, Ex. 371) <b>[No Bates]</b>	<b>403:</b> This exhibit includes references to claims that have been dismissed by the Court, including those brought by Bernie Parrish, which will confuse the jury. Plaintiffs will withdraw the objection if Defendants redact any references to claims that have been dismissed by the Court.		
373	00/00/0000 Photocopy of They Call It A Game (Parrish Deposition, Ex. 373) <b>[No Bates]</b>	<b>Hearsay:</b> Mr. Parrish's statements are hearsay.  <b>402/403:</b> This exhibit is an excerpt from Mr. Parrish's book <u>They Call it a Game</u> . This book has no probative value to the merits of the remaining claims in this lawsuit, and should be excluded.		
374	00/00/0000 Note Stating Parrish Will Run for Executive Director (Parrish Deposition, Ex. 374) <b>[CLASS003426]</b>	<b>Hearsay:</b> Mr. Parrish's statements are hearsay.  <b>402:</b> This exhibit purports to show Mr. Parrish's proposed platform for a potential candidacy for Executive Director of the NFLPA. This platform has no probative value to the remaining claims in this lawsuit, and should be excluded.		
375	Email from Rhoden to Parrish re: Bernie Call Me ... IMP! (Parrish Deposition, Ex. 375) <b>[CLASS003133]</b>	<b>Hearsay:</b> Mr. Parrish's and Mr. Bill Roden's statements are hearsay.  <b>402/403:</b> This exhibit addresses issues collateral to this lawsuit, and has no probative value to the merits of the remaining claims in this lawsuit, and should thus be excluded.		

Ex. No.	Description	Objections	Response	Court's Ruling
376	11/28/2007 Email from DeLamielleure to Parrish re: Approval of Bylaws of RFPFJ (Parrish Deposition, Ex. 376) <b>[CLASS003164 - CLASS003165]</b>	<b>Hearsay:</b> Mr. Parrish's and Mr. Joe Delamielleure's statements are hearsay.  <b>402/403:</b> This exhibit addresses the bylaws of the Retired Professional Football Players for Justice, which is an issue that is collateral to this lawsuit. This exhibit has no probative value to the merits of the remaining claims in this lawsuit, and would result in a waste of time, and should be excluded.		
377	11/24/2007 Email from Lynch to Parrish re: What Do You Think? (Parrish Deposition, Ex. 377) <b>[CLASS003161]</b>	<b>Hearsay:</b> Mr. Parrish's and Mr. Lynch's statements are hearsay.  <b>402/403:</b> This exhibit purports to show Mr. Parrish's proposed platform for a potential candidacy for Executive Director of the NFLPA. This platform has no probative value to the remaining claims in this lawsuit, and should be excluded.		
378	12/9/2007 Email from Romano to Parrish re: Endorsement by NYTmes Bill Rhoden (Parrish Deposition, Ex. 378) <b>[CLASS003103 - CLASS003106]</b>	<b>Hearsay:</b> Mr. Parrish's and Mr. Oben's statements are hearsay.  <b>402/403:</b> This exhibit contains Mr. Oben's opinion that Mr. Parrish would not be an effective leader for the NFLPA, and includes personal attacks on Mr. Parrish. This exhibit has no probative value to the remaining claims in this lawsuit, and should be excluded.		

Ex. No.	Description	Objections	Response	Court's Ruling
379	00/00/0000 Dave Pear's Official Blog: Parrish Entry (Parrish Deposition, Ex. 379) <b>[No Bates]</b>	<b>Hearsay:</b> Mr. Parrish's and Mr. Pear's statements are hearsay.		
380	02/14/2007 Letter from Mutch to Marquez re: Retired Professional Football Players For Justice, Inc. (Parrish Deposition, Ex. 380, M. Parrish Deposition, Ex. 315) <b>[CLASS000330]</b>	<p><b>Hearsay:</b> Mr. Mutch is not a class representative, and his statements are hearsay.</p> <p><b>402/403:</b> The content of this letter is about the incorporation of The Retired Professional Football Players for Justice, and is not relevant to any issues in this lawsuit. Referencing this exhibit would be a waste of time, and may require Plaintiffs to present argument on collateral issues to rebut any inferences raised by this exhibit.</p> <p><b>Authentication:</b> The letter must be authenticated before Defendants can admit it into evidence.</p>		

Ex. No.	Description	Objections	Response	Court's Ruling
382	02/06/2007 Parrish Blog Entry Entitled "Bizarre Gene Upshaw Email" (Parrish Deposition, Ex. 382) <b>[No Bates]</b>	<b>Hearsay:</b> Mr. Parrish's statements are hearsay.  <b>403:</b> This exhibit is a 130- page printout of what appears to be excerpts from Bernie Parrish's weblog, "Parrish the Thought." Numerous statements found in this weblog do not relate to the issues in this lawsuit whatsoever. Introduction of a document of this length, peppered with irrelevant information, is a waste of time, and should be excluded under rule 403. Additionally, many statements found within this weblog are inflammatory, and should be excluded in light of their minimal probative value.		
383	01/09/2008 Parrish the Thought Blog Entry (Parrish Deposition, Ex. 383) <b>[No Bates]</b>	<b>Hearsay:</b> Mr. Parrish's statements are hearsay.  <b>403:</b> This exhibit is a 24- page printout of what appears to be excerpts from Bernie Parrish's weblog, "Parrish the Thought." Numerous statements found in this weblog do not relate to the issues in this lawsuit whatsoever. Additionally, many statements found within this exhibit are inflammatory, and should be excluded in light of their minimal probative value.		

Ex. No.	Description	Objections	Response	Court's Ruling
388	03/01/2008 Email from Henderson to Upshaw re: The Pellman-Aon-Goodell Alliance (Parrish Deposition, Ex. 388) <b>[No Bates]</b>	<b>Hearsay:</b> Mr. Parrish's statements are hearsay.  <b>403:</b> This exhibit includes inflammatory statements (including a characterization of Mr. Upshaw as a "leashed pet," and characterizing Mr. Parrish as a "madman"), and should be excluded, especially in light of its lack of probative value to the merits of this case.		
418	00/00/0000 Letter from Goodstadt to Haza (Friss Deposition, Ex. 418) <b>[PI108056 - PI108060]</b>	<b>Authentication:</b> This letter must be authenticated before Defendants can use it as evidence.  <b>Hearsay:</b> If this draft letter was never sent to Topps, it would be used for the truth of the matters listed therein, and would constitute hearsay.		
622	06/13/2008 Expert Report of G. Steven Jizmagian (Jizmagian Deposition, Ex. 622) <b>[No Bates]</b>	<b>Hearsay:</b> This is the expert report of Defendants' retained expert, Mr. Jizmagian. This report is hearsay.		
624	06/12/2008 Expert Report of Roger G. Noll (Noll Deposition, Ex. 624) <b>[No Bates]</b>	<b>Hearsay:</b> This is the expert report of Defendants' retained expert, Mr. Noll. This report is hearsay.		
2000	8/29/2007 STATS LLC License Agreement, Effective 03/01/2007 <b>[PI101842 - PI101856]</b>			
2001	03/24/2005 Upper Deck - Ottis Anderson Ad Hoc <b>[PI016913 - PI016914]</b>			

Ex. No.	Description	Objections	Response	Court's Ruling
2002	03/30/2005 Upper Deck - Tony Dorsett Ad Hoc <b>[PI017012 - PI017013]</b>			
2003	03/24/2005 Upper Deck - Chuck Foreman Ad Hoc <b>[PI017040 - PI017041]</b>			
2004	03/14/2005 Upper Deck - Harold Jackson Ad Hoc <b>[PI017109 - PI017110]</b>			
2005	03/31/2005 Upper Deck - Don Maynard Ad Hoc <b>[PI017194]</b>			
2006	03/14/2005 Upper Deck - Mark Van Eeghan Ad Hoc <b>[PI017316 - PI017317]</b>			
2007	03/20/2005 Upper Deck - Troy Aikman Ad Hoc <b>[PI016900 - PI016901]</b>			
2008	03/10/2005 Upper Deck - Marcus Allen Ad Hoc <b>[PI016906 - PI016907]</b>			
2009	03/31/2005 Upper Deck - Joe Montana Ad Hoc <b>[PI017203 - PI017204]</b>			
2010	03/24/2005 Upper Deck - Raymond Berry Ad Hoc <b>[PI016929 - PI016930]</b>			
2011	03/24/2005 Upper Deck - Len Dawson Ad Hoc <b>[PI016981 - PI016982]</b>			

<b>Ex. No.</b>	<b>Description</b>	<b>Objections</b>	<b>Response</b>	<b>Court's Ruling</b>
2012	03/31/2005 Upper Deck - Cris Collinsworth Ad Hoc <b>[PI016971 - PI016972]</b>			
2013	03/31/2005 Upper Deck - Dan Fouts Ad Hoc <b>[PI017047 - PI017048]</b>			
2014	03/11/2005 Upper Deck - Russ Francis Ad Hoc <b>[PI017050 - PI017051]</b>			
2015	03/11/2005 Upper Deck - L.C. Greenwood Ad Hoc <b>[PI017062 - PI017063]</b>			
2016	03/14/2005 Upper Deck - Jack Ham Ad Hoc <b>[PI017073 - PI017074]</b>			
2017	03/14/2005 Upper Deck - Franco Harris Ad Hoc <b>[PI017082 - PI017083]</b>			
2018	03/22/2005 Upper Deck - Paul Hornung Ad Hoc <b>[PI017094 - PI017095]</b>			
2019	03/31/2005 Upper Deck - Bo Jackson Ad Hoc <b>[PI017104 PI017105]</b>			
2020	03/30/2005 Upper Deck - Deacon Jones Ad Hoc <b>[PI017120]</b>			
2021	03/17/2005 Upper Deck - Steve Largent Ad Hoc <b>[PI017152 - PI017153]</b>			

Ex. No.	Description	Objections	Response	Court's Ruling
2022	03/30/2005 Upper Deck - James Lofton Ad Hoc [PI017162 - PI017163]			
2023	03/31/2005 Upper Deck - Jim Marshall Ad Hoc [PI017183]			
2024	03/14/2005 Upper Deck - Joe Theismann Ad Hoc [PI017287 - PI017288]			
2025	03/14/2005 Upper Deck - Lenny Moore Ad Hoc [PI017205 - PI017206]			
2026	03/14/2005 Upper Deck - Ozzie Newsome Ad Hoc [PI017215 - PI017216]			
2027	03/31/2005 Upper Deck - Jim Plunkett Ad Hoc [PI017235 - PI017236]			
2028	03/22/2005 Upper Deck - Merlin Olson Ad Hoc [PI017219 - PI017220]			
2029	03/14/2005 Upper Deck - Charley Taylor Ad Hoc [PI017277 - PI017278]			
2030	05/24/2006 Financial Records Regarding HOF Deal [PI051532 - PI051542]	<b>Authentication:</b> This exhibit must be authenticated before Defendants can admit it into evidence.		
2031	05/28/2004 EA - Joe Green Ad Hoc [PI009619]			
2032	06/15/2004 EA - Cris Carter Ad Hoc [PI067232]			

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Ex. No.	Description	Objections	Response	Court's Ruling
2033	07/27/2004 EA - Eric Dickerson Ad Hoc <b>[PI067235]</b>			
2034	09/28/2004 EA - Darrell Green Ad Hoc <b>[PI067250]</b>			
2035	07/28/2004 EA - Bo Jackson Ad Hoc <b>[PI067241]</b>			
2036	05/28/2004 EA - Anthony Munoz Ad Hoc <b>[PI067223]</b>			
2037	05/28/2004 EA - Mike Singletary Ad Hoc <b>[PI009632]</b>			
2038	06/01/2004 EA - Jack Lambert Ad Hoc <b>[PI067229]</b>			
2039	08/03/2004 EA - Sterling Sharpe Ad <b>[PI067244]</b>			
2040	07/28/2004 EA - Joey Browner Ad Hoc <b>[PI067238]</b>			
2041	07/28/2004 EA - Bo Jackson Ad Hoc <b>[EA000003 - EA000004]</b>			
2042	07/27/2004 EA - Eric Dickerson Ad Hoc <b>[EA000009 - EA000010]</b>			
2043	07/28/2004 EA - Joey Browner Ad Hoc <b>[EA000013 - EA000014]</b>			
2044	08/03/2004 EA - Sterling Sharpe Ad Hoc <b>[EA000021 - EA000022]</b>			
2045	05/28/2004 EA - Randall Cunningham Ad Hoc <b>[PI067217]</b>			
2046	06/00/2004 June 2004 Touchback <b>[PI140852 - PI140855]</b>	<b>Hearsay:</b> Defendants' statements as made in this Touchback newsletter are hearsay.		

Ex. No.	Description	Objections	Response	Court's Ruling
2047	00/00/0000 Attachment A to EA License Agreement - Active Player GLA Form [PI000070]	<b>Authentication:</b> The agreement must be authenticated before Defendants can admit it into evidence.		
2048	04/01/2003 Racing Champions ERTL Corp. License Agreement, Effective 03/01/2001 [PI006374 - PI006385]			
2049	06/13/2008 Table I to the Report of G. Stephen Jizmagian: Comparison of Retired Player Licensing Revenue and Active Player Shared Pool Revenue [No Bates]	<b>Demonstrative:</b> Plaintiffs object to this exhibit because it is demonstrative evidence that should not be admitted into evidence.  <b>Hearsay:</b> This is a portion the expert report of Defendants' retained expert, Mr. Jizmagian. Any analysis from this report is hearsay.  <b>403:</b> improperly juxtaposes retired players licensing payments with active player licensing payments, which could mislead the jury, and should be excluded.		

Ex. No.	Description	Objections	Response	Court's Ruling
2050	06/13/2008 Table II to the Report of G. Stephen Jizmagian: Comparison of Actual Pool <b>[No Bates]</b>	<p><b>Demonstrative:</b> Plaintiffs object to this exhibit because it is demonstrative evidence that should not be admitted into evidence.</p> <p><b>Hearsay:</b> This is a portion the expert report of Defendants' retained expert, Mr. Jizmagian. Any analysis from this report is hearsay.</p> <p><b>403:</b> this exhibits focuses on active player payments, which is not materially probative to the merits of Plaintiffs' remaining claims, and should be excluded.</p>		
2051	06/12/2008 Table 1 to the Expert Report of Roger G. Noll: Distribution of Licensing Revenues among Members of the GLA Class, 2003 - early 2008 <b>[No Bates]</b>	<p><b>Demonstrative:</b> Plaintiffs object to this exhibit because it is demonstrative evidence that should not be admitted into evidence.</p> <p><b>Hearsay:</b> This is a portion the expert report of Defendants' retained expert, Mr. Noll. Any analysis from this report is hearsay.</p> <p><b>Improper Rule 1006 Summary:</b> this exhibit does not list the documents relied on to create this summary; thus, the underlying documents have not been "made available" under Rule 1006. As a result, this exhibit should be excluded under Rule 1006.</p>		

Ex. No.	Description	Objections	Response	Court's Ruling
2052	06/12/2008 Table 2 to the Expert Report of Roger G. Noll: Distribution of Licensing Revenues among Members of the GLA Class [No Bates]	<p><b>Demonstrative:</b> Plaintiffs object to this exhibit because it is demonstrative evidence that should not be admitted into evidence.</p> <p><b>Hearsay:</b> This is a portion the expert report of Defendants' retained expert, Mr. Noll. Any analysis from this report is hearsay.</p> <p><b>Improper Rule 1006 Summary:</b> this exhibit does not list the documents relied on to create this summary; thus, the underlying documents have not been "made available" under Rule 1006. As a result, this exhibit should be excluded under Rule 1006.</p>		
2053	06/12/2008 Table 3 to the Expert Report of Roger G. Noll: Estimates of Licensing Revenues, Disbursements to Players and Share of Gross Revenues Paid to Players [No Bates]	<p><b>Demonstrative:</b> Plaintiffs object to this exhibit because it is demonstrative evidence that should not be admitted into evidence.</p> <p><b>Hearsay:</b> This is a portion the expert report of Defendants' retained expert, Mr. Noll. Any analysis from this report is hearsay.</p>		
2054	06/12/2008 Table 4 to the Expert Report of Roger G. Noll: Percentage of Licensing Income Paid to Players [No Bates]	<p><b>Demonstrative:</b> Plaintiffs object to this exhibit because it is demonstrative evidence that should not be admitted into evidence.</p> <p><b>Hearsay:</b> This is a portion the expert report of Defendants' retained expert, Mr. Noll. Any analysis from this report is hearsay.</p>		

Ex. No.	Description	Objections	Response	Court's Ruling
2055	00/00/0000 Escrow Agreement Form from Sun Trust Bank <b>[No Bates]</b>	<b>Authentication:</b> This exhibit must be authenticated before Defendants can admit this into evidence.		
2056	00/00/0000 Federal Rule of Evidence 1006 Compilation: Class Members' Royalties (From PI051545-PI051550, PI135609-PI139710, PI139723-PI140368) <b>[No Bates]</b>	<p><b>Authentication:</b> This compilation must be authenticated before Defendants can admit this into evidence.</p> <p><b>Hearsay:</b> Defendants' statements regarding fees paid to various players are hearsay, and should be excluded.</p> <p><b>403:</b> this document appears to be a summary of "video game fees" paid to certain players. Evidence of payments pursuant to other agreements may confuse the jury as to whether the class members have been properly paid under the GLA, and has minimal probative value to the merits of the remaining claims, and should be excluded.</p>		
2057	Various Dates - Federal Rule of Evidence 1006 Compilation: Class Members' GLAs <b>[No Bates]</b>	<b>Authentication:</b> This compilation must be authenticated before Defendants can admit this into evidence.		
2059	00/00/0000 Royalty and Credited Seasons Data.xls prepared for the Expert Report of Roger G. Noll <b>[No Bates]</b>	<p><b>Demonstrative:</b> Plaintiffs object to this exhibit because it is demonstrative evidence that should not be admitted into evidence.</p> <p><b>Hearsay:</b> This is a portion the expert report of Defendants' retained expert, Mr. Noll. Any analysis from this report is hearsay.</p>		

<b>Ex. No.</b>	<b>Description</b>	<b>Objections</b>	<b>Response</b>	<b>Court's Ruling</b>
2060	06/29/2007 AOL LLC License Agreement, Effective 03/01/2007 <b>[PI101946 - PI101961]</b>			
2061	00/00/0000 CBS Interactive Inc. License Agreement, Effective 03/01/2007 <b>[PI101670 - PI101680]</b>			
2062	01/20/2000 EA License Agreement, Effective 03/01/1998 <b>[PI132982 - PI132992]</b>			
2063	08/08/2006 EA License Agreement, Effective 03/01/2006 <b>[PI000042 - PI000054]</b>			
2064	01/12/2006 EA License Agreement, Effective 03/01/2006 <b>[PI000022 - PI000041]</b>			
2065	00/00/0000 Epic Cycle License Agreement, Effective 03/01/2004 <b>[PI104550 - PI104561]</b>			
2066	09/06/2007 Fathead License Agreement, Effective 03/01/2007 <b>[PI101962 - PI101975]</b>			

Ex. No.	Description	Objections	Response	Court's Ruling
2067	08/07/2007 Fox Sports Interactive Media License Agreement, Effective 03/01/2007 <b>[PI101897 - PI101920]</b>			
2068	07/07/2004 Game Time LLC License Agreement, Effective 03/01/2004 <b>[PI008034 - PI008046]</b>			
2069	00/00/0000 GSI License Agreement, Effective 03/01/2006 <b>[PI126542 - PI126554]</b>			
2070	09/30/2007 Head2Head Sports License Agreement, Effective 3/1/2007 <b>[PI101870 - PI101883]</b>			
2071	00/00/0000 Joy Athletic License Agreement, Effective 03/01/2003 <b>[PI105182 - PI105194]</b>			
2072	12/19/2006 MBI Incorporated License Agreement Effective 03/01/2007 <b>[PI101829 - PI101841]</b>			
2073	00/00/0000 MJM Sports License Agreement, Effective 03/01/2004 <b>[PI099443 - PI099455]</b>			

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Ex. No.	Description	Objections	Response	Court's Ruling
2074	00/00/0000 MJM Sports License Agreement, Effective 03/01/2006 <b>[PI111645 - PI111657]</b>			
2075	07/31/2007 MVP Galleries License Agreement, Effective 03/01/2007 <b>[PI101816 - PI101828]</b>			
2076	00/00/0000 NBC Sports License Agreement, Effective 03/01/2007 <b>[PI101857 - PI101869]</b>			
2077	00/00/0000 No Huddle License Agreement, Effective 03/01/2004 <b>[PI117826 - PI117839]</b>			
2078	11/03/2004 Onfield Apparel License Agreement, Effective 03/01/2001 <b>[PI006429 - PI006532]</b>			
2079	10/08/2004 Riddell, Inc. License Agreement, Effective 03/01/2004 <b>[PI126283 - PI126296]</b>			
2080	00/00/0000 Screenlife LLC License Agreement, Effective 03/01/2005 <b>[PI099742 - PI099754]</b>			

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Ex. No.	Description	Objections	Response	Court's Ruling
2081	07/27/2004 Stahls' Special Projects, Inc. License Agreement, Effective 03/01/2004 <b>[PI006758 - PI006769]</b>			
2082	10/16/2007 Upper Deck License Agreement, Effective 03/01/2007 <b>[PI134286 - PI134300]</b>			
2083	11/30/2007 VF Imagewear License Agreement, Effective 03/01/2007 <b>[PI134987 - PI135000]</b>			
2084	03/18/2007 Topps Service Agreement, Effective 03/01/2007 <b>[PI007383 - PI007396]</b>			
2085	10/16/2007 Upper Deck Service Agreement, Effective 03/01/2007 <b>[PI101787 - PI101802]</b>			
2086	03/10/2005 Upper Deck - Adderley Ad Hoc <b>[PI088509 - PI088511]</b>			
2087	07/08/2005 Upper Deck - Adderley Ad Hoc <b>[P1087805]</b>			
2088	07/08/2005 Upper Deck - Adderley Ad Hoc <b>[PI087803 - PI087804]</b>			

<b>Ex. No.</b>	<b>Description</b>	<b>Objections</b>	<b>Response</b>	<b>Court's Ruling</b>
2089	08/15/2005 Upper Deck - Adderley Ad Hoc <b>[PI088054 - PI088055]</b>			
2090	08/15/2005 Upper Deck - Adderley Ad Hoc <b>[PI088052 - PI088053]</b>			
2091	08/15/2005 Upper Deck - Vernand Morency Ad Hoc <b>[PI087974 - PI087975]</b>			
2092	08/15/2005 Upper Deck - Vernand Morency Ad Hoc <b>[PI087976]</b>			
2093	04/08/2003 Letter Agreement between Adderley and PI re: Reebok Deal <b>[CLASS001746]</b>			
2094	06/14/2004 EA - Joe Greene Ad Hoc <b>[PI067218 - PI067219]</b>			
2095	06/14/2004 EA - Randall Cunningham Ad Hoc <b>[PI067215 - PI067216]</b>			
2096	01/28/2007 EA - Willis McGahee Ad Hoc <b>[PI053615 - PI053617]</b>			
2097	08/03/2007 TMP - Jack Lambert Ad Hoc <b>[PI032952]</b>			
2098	08/06/2007 TMP - Jack Lambert Ad Hoc <b>[PI032971 - PI032972]</b>			
2099	08/01/2007 TMP - Howie Long Ad Hoc <b>[PI032957]</b>			

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Ex. No.	Description	Objections	Response	Court's Ruling
2100	08/01/2007 TMP - Howie Long Ad Hoc <b>[PI032974 - PI032975]</b>			
2101	08/03/2007 TMP - Warren Moon Ad Hoc <b>[PI032959]</b>			
2102	08/06/2007 TMP - Warren Moon Ad Hoc <b>[PI032977 - PI032978]</b>			
2103	08/03/2007 TMP - John Riggins Ad Hoc <b>[PI032962]</b>			
2104	08/06/2007 TMP - John Riggins Ad Hoc <b>[PI032980 - PI032981]</b>			
2105	08/09/2007 TMP - Fran Tarkenton Ad Hoc <b>[PI032965]</b>			
2106	08/09/2007 TMP - Fran Tarkenton Ad Hoc <b>[PI032953]</b>			
2107	08/09/2007 TMP - Frank Tarkenton Ad Hoc <b>[PI032983 - PI032984]</b>			
2108	08/03/2007 TMP - Steve Young Ad Hoc <b>[PI032967]</b>			
2109	08/06/2007 TMP - Steve Young Ad Hoc <b>[PI032986 - PI032987]</b>			
2110	07/06/2006 TMP - Roger Staubach Ad Hoc <b>[PI014531]</b>			
2111	07/06/2006 TMP - Bo Jackson Ad Hoc <b>[PI014517]</b>			
2112	00/00/0000 TMP - Ronnie Lott Ad Hoc <b>[PI014519]</b>			
2113	07/06/2006 TMP - Dan Marino Ad Hoc <b>[PI014521]</b>			

<b>Ex. No.</b>	<b>Description</b>	<b>Objections</b>	<b>Response</b>	<b>Court's Ruling</b>
2114	00/00/0000 TMP - Joe Montana Ad Hoc <b>[PI014523]</b>			
2115	00/00/0000 TMP - Walter Payton Ad Hoc <b>[PI014525]</b>			
2116	07/06/2006 TMP - Earl Campbell Ad Hoc <b>[PI054235 - PI054236]</b>			
2117	07/06/2006 TMP - John Elway Ad Hoc <b>[PI014515]</b>			
2118	07/06/2006 TMP - Reggie White Ad Hoc <b>[PI014529]</b>			
2119	08/02/2004 TMP - Jim Brown Ad Hoc <b>[PI018659]</b>			
2120	05/27/2004 TMP - Johnny Unitas Ad Hoc <b>[PI018743]</b>			
2121	05/27/2004 TMP - Lawrence Taylor Ad Hoc <b>[PI018762]</b>			
2122	05/27/2004 TMP - Barry Sanders Ad Hoc <b>[PI018760]</b>			
2123	05/27/2004 TMP - Joe Greene Ad Hoc <b>[PI018750]</b>			
2124	05/27/2004 TMP - Franco Harris Ad Hoc <b>[PI018752]</b>			
2125	11/09/2004 Topps - Roger Craig Ad Hoc <b>[PI021560 - PI021561]</b>			
2126	03/16/2006 Topps - Troy Aikman Ad Hoc <b>[PI054053 - PI054054]</b>			
2127	04/03/2006 Topps - Sammy Baugh Ad Hoc <b>[PI054058 - PI054059]</b>			

Ex. No.	Description	Objections	Response	Court's Ruling
2128	09/18/2006 Topps - Chuck Bednarik Ad Hoc <b>[PI054063 - PI054064]</b>			
2129	01/09/2007 Topps - Fred Biletnikoff Ad Hoc <b>[PI054069 - PI054070]</b>			
2130	07/05/2006 Topps - Terry Bradshaw Ad Hoc <b>[PI054074 - PI054075]</b>			
2131	01/07/2007 Topps - Jim Brown Ad Hoc <b>[PI054079 - PI054080]</b>			
2132	04/03/2006 Topps - Earl Campbell Ad Hoc <b>[PI054088 - PI054089]</b>			
2133	09/26/2006 Topps - Eric Dickerson Ad Hoc <b>[PI054097 - PI054098]</b>			
2134	08/17/2006 Topps - Art Donovan Ad Hoc <b>[PI054104 - PI054105]</b>			
2135	01/04/2007 Topps - Tony Dorsett Ad Hoc <b>[PI054109 - PI054110]</b>			
2136	12/11/2006 Topps - John Elway Ad Hoc <b>[PI054111 - PI054112]</b>			
2137	12/05/2006 Topps - Frank Gifford Ad Hoc <b>[PI054118 - PI054119]</b>			
2138	10/23/2006 Topps - Paul Hornung Ad Hoc <b>[PI054122 - PI054123]</b>			

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Ex. No.	Description	Objections	Response	Court's Ruling
2139	05/08/2006 Topps - Bo Jackson Ad Hoc <b>[PI054132 - PI054133]</b>			
2140	06/20/2006 Topps - Jim Kelly Ad Hoc <b>[PI054137 - PI054138]</b>			
2141	08/10/2006 Topps - Gino Marchetti Ad Hoc <b>[PI054142 - PI054143]</b>			
2142	01/04/2007 Topps - Dan Marino Ad Hoc <b>[PI054148 - PI054149]</b>			
2143	10/24/2006 Topps - Joe Theismann Ad Hoc <b>[PI054210 - PI054211]</b>			
2144	07/05/2006 Topps - Joe Montana Ad Hoc <b>[PI054160 - PI054161]</b>			
2145	04/03/2006 Topps - Bronko Nagurski Ad Hoc <b>[PI054165 - PI054166]</b>			
2146	08/01/2006 Topps - Joe Namath Ad Hoc <b>[PI054167 - PI054168]</b>			
2147	07/11/2006 Topps - Emmitt Smith Ad Hoc <b>[PI054208 - PI054209]</b>			
2148	04/26/2006 Topps - Walter Payton Ad Hoc <b>[PI054179 - PI054180]</b>			
2149	10/24/2006 Topps - Jim Plunkett Ad Hoc <b>[PI054181 - PI054182]</b>			
2150	12/11/2006 Topps - Jerry Rice Ad Hoc <b>[PI054192 - PI054193]</b>			

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Ex. No.	Description	Objections	Response	Court's Ruling
2151	11/29/2006 Topps - Barry Sanders Ad Hoc <b>[PI054199 - PI054200]</b>			
2152	08/30/2006 Topps - Plaxico Burress Ad Hoc <b>[PI053933 - PI053934]</b>			
2153	10/20/2005 Fathead - Jack Lambert Ad Hoc <b>[PI055108]</b>			
2154	11/08/2005 Fathead - Boomer Esiason Ad Hoc <b>[PI055109]</b>			
2155	10/26/2005 Fathead - Marcus Allen Ad Hoc <b>[PI055110]</b>			
2156	10/20/2005 Fathead - Barry Sanders Ad Hoc <b>[PI055111]</b>			
2157	10/26/2005 Fathead - Emmitt Smith Ad Hoc <b>[PI055112]</b>			
2158	10/26/2005 Fathead - John Elway Ad Hoc <b>[PI055113]</b>			
2159	11/22/2005 Fathead - Lawrence Taylor Ad Hoc <b>[PI055114]</b>			
2160	11/08/2005 Fathead - Dan Marino Ad Hoc <b>[PI055116]</b>			
2161	11/07/2005 Fathead - Jerry Rice Ad Hoc <b>[PI055117]</b>			
2162	11/07/2005 Fathead - Troy Aikman Ad Hoc <b>[PI055118]</b>			

<b>Ex. No.</b>	<b>Description</b>	<b>Objections</b>	<b>Response</b>	<b>Court's Ruling</b>
2163	12/12/2005 Fathead - Walter Payton Ad Hoc <b>[PI055121]</b>			
2164	11/08/2005 Fathead - Bernie Kosar Ad Hoc <b>[PI055122]</b>			
2165	12/21/2005 Fathead - Joe Montana Ad Hoc <b>[PI055123]</b>			
2166	01/10/2006 Fathead - Shannon Sharpe Ad Hoc <b>[PI055124]</b>			
2167	05/10/2005 Fathead - Ben Roethlisberger Ad Hoc <b>[PI055128 - PI055130]</b>			
2168	05/04/2004 USAopoly - Dan Marino Ad Hoc <b>[PI020982]</b>			
2169	05/04/2004 USAopoly - Dan Marino Ad Hoc <b>[PI056601 - PI056602]</b>			
2170	05/27/2004 TMP - Ray Nitschke Ad Hoc <b>[PI018754]</b>			
2171	08/16/2005 Motorola - Willie Lanier Ad Hoc <b>[PI016593]</b>			
2172	07/31/2007 Playoff Corporation - Willie Lanier Ad Hoc <b>[PI031947 - PI031948]</b>			
2173	09/21/2006 Sprint - Willie Lanier Ad Hoc <b>[PI062205 - PI062207]</b>			

<b>Ex. No.</b>	<b>Description</b>	<b>Objections</b>	<b>Response</b>	<b>Court's Ruling</b>
2174	09/09/2005 Motorola - Willie Lanier Ad Hoc [PI070613 - PI070615]			
2175	09/09/2005 Motorola - Willie Lanier Ad Hoc [PI070616]			
2176	09/21/2006 Sprint - Willie Lanier Ad Hoc [PI071275 - PI071277]			
2177	07/31/2007 Playoff Corporation - Willie Lanier Ad Hoc [PI080481 - PI080482]			
2178	09/21/2006 Sprint - Willie Lanier Ad Hoc [PI062068 - PI062070]			
2179	09/21/2006 Sprint - Willie Lanier Marketing Memo [PI004694]			
2180	07/25/2007 Gallo - Willie Lanier Marketing Memo [PI031088]			
2181	08/25/2003 NFL - Willie Lanier Marketing Form and Terms of Agreement [PI048342]			
2182	07/20/2006 Gallo - Willie Lanier Marketing Memo [PI060586]			
2183	07/25/2007 Gallo - Willie Lanier Marketing Memo [PI063973]			
2184	10/21/2002 Oscar Mayer - Willie Lanier Marketing Form [PI064146]			

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Ex. No.	Description	Objections	Response	Court's Ruling
2185	09/01/2003 NFL - Willie Lanier Marketing Form [PI068246]			
2186	09/21/2006 Sprint - Willie Lanier Marketing Memo [PI071278]			
2187	06/20/2006 Press Pass - Tim Brown Ad Hoc [PI005179 - PI005180]			
2188	04/20/2007 Playoff Corporation - Tim Brown Ad Hoc [PI013029]			
2189	04/30/2007 Topps - Tim Brown Ad Hoc [PI013290]			
2190	09/20/2005 EA - Tim Brown Marketing Memo [PI013416]			
2191	08/29/2005 NFL - Tim Brown Marketing Memo [PI013528]			
2192	08/30/2005 NFL - Tim Brown Marketing Memo [PI013529]			
2193	09/21/2004 ESPN - Tim Brown Marketing Memo [PI021883]			
2194	04/20/2007 Playoff Corporation - Tim Brown Ad Hoc [PI031560 - PI031561]			
2195	04/30/2007 Topps - Tim Brown Ad Hoc [PI033007 - PI033008]			
2196	09/23/2003 Upper Deck - Tim Brown Ad Hoc [PI044246 - PI044247]			

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Ex. No.	Description	Objections	Response	Court's Ruling
2197	09/23/2003 Playoff Corporation - Tim Brown Ad Hoc <b>[PI049393 - PI049394]</b>			
2198	03/11/2003 Playoff Corporation - Tim Brown Ad Hoc <b>[PI049866 - PI049867]</b>			
2199	06/20/2006 RC2 Brands - Tim Brown Ad Hoc <b>[PI052930 - PI052931]</b>			
2200	01/05/2007 Topps - Tim Brown Ad Hoc <b>[PI054043 - PI054044]</b>			
2201	01/05/2007 Topps - Tim Brown Ad Hoc <b>[PI054086 - PI054087]</b>			
2202	12/18/2006 Reebok - Tim Brown Ad Hoc <b>[PI055364 - PI055366]</b>			
2203	10/25/2004 Upper Deck - Tim Brown Ad Hoc <b>[PI055542 - PI055543]</b>			
2204	09/21/2004 ESPN - Tim Brown Marketing Memo <b>[PI065944]</b>			
2205	09/20/2005 EA - Tim Brown Marketing Memo <b>[PI066756]</b>			
2206	08/30/2005 NFL - Tim Brown Marketing Memo <b>[PI068364]</b>			
2207	08/29/2005 NFL - Tim Brown Marketing Memo <b>[PI068396]</b>			

<b>Ex. No.</b>	<b>Description</b>	<b>Objections</b>	<b>Response</b>	<b>Court's Ruling</b>
2208	00/00/0000 Visa - Tim Brown Marketing Form <b>[PI068843]</b>			
2209	00/00/0000 Visa - Tim Brown Marketing Form <b>[PI068844]</b>			
2210	04/17/2007 NFL - Tim Brown Marketing Memo <b>[PI071354]</b>			
2211	02/08/2007 NFL - Tim Brown Marketing Memo <b>[PI071765]</b>			
2212	01/24/2006 News America - Tim Brown Ad Hoc <b>[PI073726 - PI073728]</b>			
2213	01/24/2006 News America - Tim Brown Marketing Memo <b>[PI073729]</b>			
2214	04/20/2007 Playoff Corporation - Tim Brown Ad Hoc <b>[PI080382 - PI080383]</b>			
2215	04/20/2007 Playoff Corporation - Tim Brown Ad Hoc <b>[PI080384]</b>			
2216	06/22/2007 Topps - Tim Brown Ad Hoc <b>[PI084072 - PI084073]</b>			
2217	04/27/2007 Topps - Tim Brown Ad Hoc <b>[PI084074]</b>			
2218	01/05/2007 Topps - Tim Brown Ad Hoc <b>[PI083997 - PI083998]</b>			

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Ex. No.	Description	Objections	Response	Court's Ruling
2219	00/00/0000 GMC - Walter Payton, Lynn Swann, Otis Taylor Ad Hoc <b>[PI004446 - PI004451]</b>			
2220	10/04/2003 Mike McBath GLA <b>[PI028917]</b>			
2221	11/17/2004 Andre Collins GLA <b>[PI027801]</b>			
2222	12/19/2002 Willie Lanier GLA <b>[PI028749]</b>			
2223	08/03/2001 Willie Lanier GLA <b>[PI028750]</b>			
2224	03/29/2000 Dan Goich GLA <b>[PI030312]</b>			
2225	09/18/2003 Tim Brown GLA <b>[PI002819]</b>			

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Ex. No.	Description	Objections	Response	Court's Ruling
2226	Various Dates - Raider Reports [PI135609 - PI139710]	<p><b>Hearsay:</b> This are spreadsheets generated by Defendant that purport to show payments made to retired players from third-party licenses. Defendants' statements regarding the amounts earned by retired players are hearsay.</p> <p><b>Authentication:</b> The exhibit must be authenticated before Defendants can admit it into evidence.</p> <p><b>403:</b> this exhibit provides the amounts that retired players were paid pursuant to <i>ad hoc</i> agreements, which does not affect whether retired players are entitled to an equal share royalty under the GLA. As a jury may be confused when faced with evidence of amounts retired players were paid under separate third-party agreements, the Court should exclude this exhibit.</p>		

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Ex. No.	Description	Objections	Response	Court's Ruling
2227	Various Dates - Raider Reports [PI139723 - PI140217]	<p><b>Hearsay:</b> This are spreadsheets generated by Defendant that purport to show payments made to retired players from third-party licenses. Defendants' statements regarding the amounts earned by retired players are hearsay.</p> <p><b>Authentication:</b> The exhibit must be authenticated before Defendants can admit it into evidence.</p> <p><b>403:</b> this exhibit provides the amounts that retired players were paid pursuant to <i>ad hoc</i> agreements, which does not affect whether retired players are entitled to an equal share royalty under the GLA. As a jury may be confused when faced with evidence of amounts retired players were paid under separate third-party agreements, the Court should exclude this exhibit.</p>		

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Ex. No.	Description	Objections	Response	Court's Ruling
2228	Various Dates - Raider Reports [PI140218 - PI140368]	<p><b>Hearsay:</b> This are spreadsheets generated by Defendant that purport to show payments made to retired players from third-party licenses. Defendants' statements regarding the amounts earned by retired players are hearsay.</p> <p><b>Authentication:</b> The exhibit must be authenticated before Defendants can admit it into evidence.</p> <p><b>403:</b> this exhibit provides the amounts that retired players were paid pursuant to <i>ad hoc</i> agreements, which does not affect whether retired players are entitled to an equal share royalty under the GLA. As a jury may be confused when faced with evidence of amounts retired players were paid under separate third-party agreements, the Court should exclude this exhibit.</p>		

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Ex. No.	Description	Objections	Response	Court's Ruling
2229	Various Dates - Raider Reports [PI091026 - PI094483]	<p><b>Hearsay:</b> This are spreadsheets generated by Defendant that purport to show payments made to retired players from third-party licenses. Defendants' statements regarding the amounts earned by retired players are hearsay.</p> <p><b>Authentication:</b> The exhibit must be authenticated before Defendants can admit it into evidence.</p> <p><b>403:</b> this exhibit provides the amounts that retired players were paid pursuant to <i>ad hoc</i> agreements, which does not affect whether retired players are entitled to an equal share royalty under the GLA. As a jury may be confused when faced with evidence of amounts retired players were paid under separate third-party agreements, the Court should exclude this exhibit.</p>		

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Ex. No.	Description	Objections	Response	Court's Ruling
2230	Various Dates - Raider Reports [PI094484 - PI094955]	<p><b>Hearsay:</b> This are spreadsheets generated by Defendant that purport to show payments made to retired players from third-party licenses. Defendants' statements regarding the amounts earned by retired players are hearsay.</p> <p><b>Authentication:</b> The exhibit must be authenticated before Defendants can admit it into evidence.</p> <p><b>403:</b> this exhibit provides the amounts that retired players were paid pursuant to <i>ad hoc</i> agreements, which does not affect whether retired players are entitled to an equal share royalty under the GLA. As a jury may be confused when faced with evidence of amounts retired players were paid under separate third-party agreements, the Court should exclude this exhibit.</p>		

Ex. No.	Description	Objections	Response	Court's Ruling
2231	Various Dates - Raider Reports [PI094956 - PI095073]	<p><b>Hearsay:</b> This are spreadsheets generated by Defendant that purport to show payments made to retired players from third-party licenses. Defendants' statements regarding the amounts earned by retired players are hearsay.</p> <p><b>Authentication:</b> The exhibit must be authenticated before Defendants can admit it into evidence.</p> <p><b>403:</b> this exhibit provides the amounts that retired players were paid pursuant to <i>ad hoc</i> agreements, which does not affect whether retired players are entitled to an equal share royalty under the GLA. As a jury may be confused when faced with evidence of amounts retired players were paid under separate third-party agreements, the Court should exclude this exhibit.</p>		
2232	00/00/0000 EA Video Game Fee List [PI051545 - PI051550]	<b>Authentication:</b> This exhibit must be authenticated before Defendants can admit this into evidence.		
2242	03/01/2007 - 02/29/2008 NFLPA Annual Financial Report: 2007-2008 [PI140387 - PI140443]	<b>Hearsay:</b> Defendants' statements about their own financial positions are hearsay, and should be excluded.		
2243	03/01/2004 - 02/28/2005 NFLPA Financial Statement: 2004-2005 [PI096088 - PI096150]	<b>Hearsay:</b> Defendants' statements about their own financial positions are hearsay, and should be excluded.		

Ex. No.	Description	Objections	Response	Court's Ruling
2244	03/01/2003 - 02/29/2004 NFLPA Financial Statement: 2003-2004 [PI096151 - PI096214]	<b>Hearsay:</b> Defendants' statements about their own financial positions are hearsay, and should be excluded.		
2245	03/01/2002 - 02/28/2003 NFLPA Financial Statement: 2002-2003 [PI096215 - PI096276]	<b>Hearsay:</b> Defendants' statements about their own financial positions are hearsay, and should be excluded.		
2246	11/03/1994 Amended Bylaws of PI [PI139711 - PI139721]			
2247	03/18/1991 Minutes of NFLPA Board of Player Directors' Meeting [PI096277]	<p><b>Hearsay:</b> Any statements attributable to Defendants or third parties, including minutes from NFLPA board meetings, are hearsay and should be excluded.</p> <p><b>Authentication:</b> This exhibit must be authenticated before Defendants can admit this into evidence.</p>		

Ex. No.	Description	Objections	Response	Court's Ruling
2248	03/31/2008 Credited Seasons Listing [No Bates]	<p><b>Hearsay:</b> These are spreadsheets generated by Defendants that purport to show pension-credited seasons of active players. Defendants' statements regarding the number of seasons played by certain active players are hearsay.</p> <p><b>Authentication:</b> The exhibit must be authenticated before Defendants can admit it into evidence.</p> <p><b>403:</b> this exhibit focuses on active players. The number of seasons credited to active players, for pension purposes, is not materially relevant to the merits of the remaining claims.</p>		
2249	00/00/0000 Reebok - DeAngelo Hall Advertisement [PI141252 - PI141253]	<b>Authentication:</b> This exhibit must be authenticated before Defendants can admit this into evidence.		
2250	00/00/0000 Reebok - NFL Zone Advertisement [PI141254]	<b>Authentication:</b> This exhibit must be authenticated before Defendants can admit this into evidence.		
2251	00/00/0000 Reebok - William Henderson, Najeh Davenport Advertisement [PI141255 - PI141258]	<b>Authentication:</b> This exhibit must be authenticated before Defendants can admit this into evidence.		
2252	00/00/0000 EA/Madden '06 Advertisement (video) [PI141259]	<b>Authentication:</b> This exhibit must be authenticated before Defendants can admit this into evidence.		
2253	00/00/0000 Reebok Advertisement (video) [PI141260]	<b>Authentication:</b> This exhibit must be authenticated before Defendants can admit this into evidence.		

Ex. No.	Description	Objections	Response	Court's Ruling
2254	00/00/0000 Fathead Advertisement [PI141261]	<b>Authentication:</b> This exhibit must be authenticated before Defendants can admit this into evidence.		
2255	00/00/0000 NFL Players.com Advertisement [PI141262 - PI141263]	<b>Authentication:</b> This exhibit must be authenticated before Defendants can admit this into evidence.		
2256	00/00/0000 NFL Players.com Advertisement [PI141264 - PI141265]	<b>Authentication:</b> This exhibit must be authenticated before Defendants can admit this into evidence.  <b>Hearsay:</b> Any statements attributable to a third party are hearsay.		
2257	00/00/0000 Reebok/Modell's Advertisement (video) [PI141266]	<b>Authentication:</b> This exhibit must be authenticated before Defendants can admit this into evidence.		
2258	01/00/2006 Players Inc Brochure [PI140980 - PI140983]	<b>Authentication:</b> This exhibit must be authenticated before Defendants can admit this into evidence.  <b>Hearsay:</b> Any statements attributable to Defendants or third parties are hearsay and should be excluded.		
2259	09/00/2006 Players Inc Brochure [PI140996 - PI140999]	<b>Authentication:</b> This exhibit must be authenticated before Defendants can admit this into evidence.  <b>Hearsay:</b> Any statements attributable to Defendants or third parties are hearsay and should be excluded.		

Ex. No.	Description	Objections	Response	Court's Ruling
2260	00/00/0000 Players Inc Brochure <b>[No Bates]</b>	<p><b>Authentication:</b> This exhibit must be authenticated before Defendants can admit this into evidence.</p> <p><b>Hearsay:</b> Any statements attributable to Defendants or third parties are hearsay and should be excluded.</p>		
2261	00/00/0000 Players Inc Brochure <b>[No Bates]</b>	<p><b>Authentication:</b> This exhibit must be authenticated before Defendants can admit this into evidence.</p> <p><b>Hearsay:</b> Any statements attributable to Defendants or third parties are hearsay and should be excluded.</p>		
2262	09/01/2003 Street & Smith's Sports Business Journal Special Advertising Feature <b>[No Bates]</b>	<p><b>Authentication:</b> This exhibit must be authenticated before Defendants can admit this into evidence.</p> <p><b>Hearsay:</b> Any statements attributable to Defendants or third parties are hearsay and should be excluded.</p>		
2263	00/00/01000 Hard- Hitting Marketing Brochure <b>[No Bates]</b>	<p><b>Authentication:</b> This exhibit must be authenticated before Defendants can admit this into evidence.</p> <p><b>Hearsay:</b> Any statements attributable to Defendants or third parties are hearsay and should be excluded.</p>		
2264	00/00/0000 Hard- Hitting Marketing Brochure <b>[No Bates]</b>	<p><b>Authentication:</b> This exhibit must be authenticated before Defendants can admit this into evidence.</p> <p><b>Hearsay:</b> Any statements attributable to Defendants or third parties are hearsay and should be excluded.</p>		

Ex. No.	Description	Objections	Response	Court's Ruling
2265	00/00/0000 Retired Players Video Game Payments [PI095700 - PI095716]	<p><b>Authentication:</b> This compilation must be authenticated before Defendants can admit this into evidence.</p> <p><b>Hearsay:</b> Defendants' statements regarding fees paid to various players are hearsay, and should be excluded.</p> <p><b>403:</b> this document appears to be a summary of "video game payments" for certain players. Evidence of payments pursuant to other agreements may confuse the jury as to whether the class members have been properly paid under the GLA, and has minimal probative value to the merits of the remaining claims, and should be excluded.</p>		
2266	00/00/0000 Madden 2007 Screenshot Player Management 66 Packers CB#32 [No Bates]			
2267	00/00/0000 Madden 2007 Screenshot Player Management 66 Packers CB#27 [No Bates]			
2268	00/00/0000 Madden 2007 Screenshot Player Management 66 Packers CB#20 [No Bates]			

Ex. No.	Description	Objections	Response	Court's Ruling
2269	00/00/0000 Madden 2007 Screenshot Player Management 66 Packers CB#29 <b>[No Bates]</b>			
2270	00/00/0000 Madden 2007 Screenshot Player Management 66 Packers CB#18 <b>[No Bates]</b>			
2271	00/00/0000 Madden 2007 Screenshot Player Information Hall of Fame Herb Adderley <b>[No Bates]</b>			
2272	00/00/0000 Madden 2007 Screenshot Player Information Raiders Shane Lechler <b>[No Bates]</b>			
2273	00/00/0000 Madden 2007 Screenshot Player Information Raiders Randy Moss <b>[No Bates]</b>			
2274	00/00/0000 Madden 2007 Screenshot Player Information Raiders Rod Smart <b>[No Bates]</b>			
2275	00/00/0000 Madden 2007 Screenshot Player Information 49ers Derek Smith <b>[No Bates]</b>			

Ex. No.	Description	Objections	Response	Court's Ruling
2276	00/00/0000 Madden 2007 Screenshot Player Information 49ers Bryant Young <b>[No Bates]</b>			
2277	00/00/0000 Madden 2007 Screenshot Player Information 49ers Frank Gore <b>[No Bates]</b>			
2279	00/00/0000 Pro-Football-Reference.com Entry for Grady Richardson <b>[No Bates]</b>			
2280	00/00/0000 Pro-Football-Reference.com Entry for Shawn Hollingsworth <b>[No Bates]</b>			
2281	00/00/0000 Pro-Football-Reference.com Entry for John Covington <b>[No Bates]</b>			
2282	00/00/0000 Pro-Football-Reference.com Entry for Lamont Burns <b>[No Bates]</b>			
2283	00/00/0000 Pro-Football-Reference.com Entry for Leland Douglas <b>[No Bates]</b>			
2284	00/00/0000 Pro-Football-Reference.com Entry for Marvin Marshall <b>[No Bates]</b>			

Ex. No.	Description	Objections	Response	Court's Ruling
2285	00/00/0000 Pro-Football-Reference.com Entry for Wally Richardson <b>[No Bates]</b>			
2286	00/00/0000 Pro-Football-Reference.com Entry for Don Gulseth <b>[No Bates]</b>			
2287	00/00/0000 Pro-Football-Reference.com Entry for Jason Carthen <b>[No Bates]</b>			
2288	00/00/0000 Pro-Football-Reference.com Entry for Gene Felker <b>[No Bates]</b>			
2289	12/01/2003 2003 Players Inc Monthly Report <b>[PI102114 - PI102116]</b>	<b>Hearsay:</b> Defendants' statements in the form of a monthly report are hearsay, and should be excluded.		
2290	03/01/2004 February 2004 Players Inc Monthly Report <b>[PI102212 - PI102214]</b>	<b>Hearsay:</b> Defendants' statements in the form of a monthly report are hearsay, and should be excluded.		
2291	04/13/2004 March 2004 Players Inc Monthly Report <b>[PI102268 - PI102270]</b>	<b>Hearsay:</b> Defendants' statements in the form of a monthly report are hearsay, and should be excluded.		
2292	09/02/2004 August 2004 Players Inc Monthly Report <b>[PI102182 - PI102184]</b>	<b>Hearsay:</b> Defendants' statements in the form of a monthly report are hearsay, and should be excluded.		
2293	10/02/2004 - September 2004 Players Inc Monthly Report <b>[PI102310 - PI102311]</b>	<b>Hearsay:</b> Defendants' statements in the form of a monthly report are hearsay, and should be excluded.		

Ex. No.	Description	Objections	Response	Court's Ruling
2294	11/09/2004 - October 2004 Players Inc Monthly Report [PI102296 - PI10298]	<b>Hearsay:</b> Defendants' statements in the form of a monthly report are hearsay, and should be excluded.		
2295	01/11/2004 - November 2004 Players Inc Monthly Report [PI102196 - PI102198]	<b>Hearsay:</b> Defendants' statements in the form of a monthly report are hearsay, and should be excluded.		
2296	12/06/2004 - November 2004 Players Inc Monthly Marketing Report [PI134301 - PI134303]	<b>Hearsay:</b> Defendants' statements in the form of a monthly report are hearsay, and should be excluded.		
2297	02/16/2005 - January 2005 Players Inc Monthly Report [PI102380 - PI102382]	<b>Hearsay:</b> Defendants' statements in the form of a monthly report are hearsay, and should be excluded.		
2298	06/06/2005 - May 2005 Players Inc Monthly Report [PI102403 - PI102404]	<b>Hearsay:</b> Defendants' statements in the form of a monthly report are hearsay, and should be excluded.		
2299	12/23/2005 - December 2005 Players Inc Monthly Report [PI102353 - PI102355]	<b>Hearsay:</b> Defendants' statements in the form of a monthly report are hearsay, and should be excluded.		
2300	01/31/2006 - January 2006 Players Inc Monthly Report [PI102562 - PI102564]	<b>Hearsay:</b> Defendants' statements in the form of a monthly report are hearsay, and should be excluded.		
2301	02/28/2006 - February 2006 Players Inc Monthly Report [PI102542 - PI102545]	<b>Hearsay:</b> Defendants' statements in the form of a monthly report are hearsay, and should be excluded.		

Ex. No.	Description	Objections	Response	Court's Ruling
2302	05/31/2006 - May 2006 Players Inc Monthly Report <b>[PI102620 - PI102623]</b>	<b>Hearsay:</b> Defendants' statements in the form of a monthly report are hearsay, and should be excluded.		
2303	06/30/2006 - June 2006 Players Inc Monthly Report <b>[PI102601 - PI102603]</b>	<b>Hearsay:</b> Defendants' statements in the form of a monthly report are hearsay, and should be excluded.		
2304	07/31/2006 - July 2006 Players Inc Monthly Report <b>[PI102579 - PI102581]</b>	<b>Hearsay:</b> Defendants' statements in the form of a monthly report are hearsay, and should be excluded.		
2305	08/31/2006 - August 2006 Players Inc Monthly Report <b>[PI103560 - PI103561]</b>	<b>Hearsay:</b> Defendants' statements in the form of a monthly report are hearsay, and should be excluded.		
2306	09/30/2006 - September 2006 Players Inc Monthly Report <b>[PI102676 - PI102677]</b>	<b>Hearsay:</b> Defendants' statements in the form of a monthly report are hearsay, and should be excluded.		
2307	10/31/2006 - October 2006 Players Inc Monthly Report <b>[PI102656 - PI102657]</b>	<b>Hearsay:</b> Defendants' statements in the form of a monthly report are hearsay, and should be excluded.		
2308	01/05/2007 - December 2006 Players Inc Monthly Report <b>[PI102513 - PI102514]</b>	<b>Hearsay:</b> Defendants' statements in the form of a monthly report are hearsay, and should be excluded.		
2309	02/01/2007 - January 2007 Players Inc Monthly Report <b>[PI102754 - PI102755]</b>	<b>Hearsay:</b> Defendants' statements in the form of a monthly report are hearsay, and should be excluded.		
2310	06/01/2007 - May 2007 Players Inc Monthly Report <b>[PI102839 - PI102840]</b>	<b>Hearsay:</b> Defendants' statements in the form of a monthly report are hearsay, and should be excluded.		

Ex. No.	Description	Objections	Response	Court's Ruling
2311	08/01/2007 - July 2007 Players Inc Monthly Report [PI102790 - PI102792]	<b>Hearsay:</b> Defendants' statements in the form of a monthly report are hearsay, and should be excluded.		
2312	09/01/2007 - August 2007 Players Inc Monthly Report [PI102709 - PI102710]	<b>Hearsay:</b> Defendants' statements in the form of a monthly report are hearsay, and should be excluded.		
2313	04/03/2008 Email from Rascher to Kessler re: Sports Consulting and Expert Witness Services [No Bates]	<b>Hearsay:</b> Mr. Rascher's statements are hearsay, and should be excluded.		
2314	10/19/2005 Email from Krzesny to Castillon PI097411 - PI097413]	<b>Authentication:</b> This exhibit must be authenticated before Defendants can admit this into evidence.  <b>Hearsay:</b> This exhibit contains statements that are hearsay and should be excluded.		
2315	00/00/0000 New License Overview Letter Template [PI131102 - PI131104]	<b>Authentication:</b> this exhibit must be authenticated before Defendants can admit this into evidence.  <b>Hearsay:</b> This exhibit contains statements that are hearsay and should be excluded.		
2316	00/00/0000 Template Letter from Goodstadt to Licensee [PI131225 - PI131230]	<b>Authentication:</b> This exhibit must be authenticated before Defendants can admit this into evidence.  <b>Hearsay:</b> This exhibit contains statements that are hearsay and should be excluded.		

Ex. No.	Description	Objections	Response	Court's Ruling
2317	05/20/1999 Email from Lawsun to Kennedy [PI131576 - PI131577]	<b>Authentication:</b> This exhibit must be authenticated before Defendants can admit this into evidence.  <b>Hearsay:</b> This exhibit contains statements that are hearsay and should be excluded.		
2318	11/07/2006 Email from Parrish to Laird re: What do you think? [CLASS003725]	<b>Hearsay:</b> This exhibit contains statements that are hearsay and should be excluded.		
2319	00/00/0000 2006 Madden Hall of Fame Opt-In Form [PI113786]	<b>Authentication:</b> This exhibit must be authenticated before Defendants can admit this into evidence.		
2320	10/27/2005 Letter from Bankert to Hunt [PI126889]	<b>Authentication:</b> This exhibit must be authenticated before Defendants can admit this into evidence.		
2321	08/31/2005 Letter from Manolakas to Tim Brown [PI013526]			
2322	03/10/2006 - 03/17/2006 - 2006 Retired Players Department Report [PI140685 - PI140695]	<b>Hearsay:</b> These reports contain hearsay statements attributable to Defendants and third parties, and should be excluded.		
2323	03/10/2005 - 03/17/2005 - 2005 Retired Players Department Report [PI140569 - PI140582]	<b>Hearsay:</b> These reports contain hearsay statements attributable to Defendants and third parties, and should be excluded.		
2324	03/26/2004 - 04/02/2004 - 2004 Retired Players Department Report [PI140497 - PI140503]	<b>Hearsay:</b> These reports contain hearsay statements attributable to Defendants and third parties, and should be excluded.		

Ex. No.	Description	Objections	Response	Court's Ruling
2325	03/00/2005 NFLPA Retired Players Chapter Regulations [PI135449 - PI135487]	<b>Hearsay:</b> These reports contain hearsay statements attributable to Defendants and third parties, and should be excluded.		
2326	05/00/2006 NFLPA Retired Players Chapter Regulations [PI135488 - PI135526]	<b>Hearsay:</b> These reports contain hearsay statements attributable to Defendants and third parties, and should be excluded.		
2327	10/00/2006 NFLPA Retired Players Chapter Regulations [PI135568 - PI135608]	<b>Hearsay:</b> These reports contain hearsay statements attributable to Defendants and third parties, and should be excluded.		
2328	00/00/0000 Form Letter from Becker to NFLPA Retired Member [PI134544]			
2329	03/31/2004 Form Letter from D. Allen and Becker [PI134537]			
2330	00/00/0000 NFLPA - Retired Player Association Program Benefits with Budget [PI134529 - PI134530]	<b>Hearsay:</b> This exhibit contains hearsay statements attributable to third parties, and should be excluded.		
2331	00/00/0000 NFLPA - Retired Player Association Program Benefits with AVIS [PI134527 - PI134528]	<b>Hearsay:</b> This exhibit contains hearsay statements attributable to third parties, and should be excluded.		
2332	00/00/0000 NFLPA - Retired Player Association Program Benefits with Chase [PI134524 - PI134525]	<b>Hearsay:</b> This exhibit contains hearsay statements attributable to third parties, and should be excluded.		

Ex. No.	Description	Objections	Response	Court's Ruling
2333	00/00/0000 NFLPA 2004 Retired Player Member Programs [PI134522 - PI134523]	<b>Hearsay:</b> This exhibit contains hearsay statements attributable to third parties, and should be excluded.		
2334	03/15/2006 Letter from NFLPA Retired Players Steering Committee to Bernard Parrish [CLASS000019 - CLASS000020]	<b>Hearsay:</b> This exhibit contains hearsay statements attributable to third parties, and should be excluded.		
2335	00/00/0000 <u>They Call It A Game</u> [No Bates]	<b>Hearsay:</b> This exhibit presumably contains excerpts from Bernie Parrish's book, <i>They Call It A Game</i> . As such, this exhibit contains hearsay statements attributable to Bernie Parrish, and should be excluded.  As Defendants have failed to produce this exhibit to Plaintiffs, Plaintiffs reserve their right to further object to this exhibit.		
2336	03/10/2005 Adderley Ad Hoc with Upper Deck (Adderley Deposition, Ex. 171) [PI088512 - PI088513]			
2337	01/16/2007 Email from Adderley to Parrish re: Update (Adderley Deposition, Ex. 170) [CLASS002717]			

Ex. No.	Description	Objections	Response	Court's Ruling
2338	05/21/2008 Plaintiffs' Supplemental Responses and Objections to Defendants First Set of Requests for Admission <b>[No Bates]</b>	<b>403:</b> This exhibit contains numerous legal objections to the scope of content of the interrogatories, which could confuse the jury. Plaintiffs will withdraw this objection if those objections are redacted.		
2339	02/15/2008 Verification of Charhon for Plaintiffs' Objections and Responses to First Set of Interrogatories <b>[No Bates]</b>	<b>403:</b> This exhibit is a verification signed by counsel for the Plaintiffs and should be excluded because it is likely to could confuse the jury.		
2340	05/23/2008 Plaintiffs' Supplemental Objections and Responses to Defendants' First Set of Interrogatories, with Hilbert Verification <b>[No Bates]</b>	<b>403:</b> This exhibit contains numerous legal objections to the scope of content of the interrogatories, which could confuse the jury. Plaintiffs will withdraw this objection if those objections are redacted.		
2341	03/17/2008 Plaintiffs' Objections and Responses to Defendants' Second Set of Interrogatories, with Rowley Verification <b>[No Bates]</b>	<b>403:</b> This exhibit contains numerous legal objections to the scope of content of the interrogatories, which could confuse the jury. Plaintiffs will withdraw this objection if those objections are redacted.  <b>403:</b> This document includes references to claims that have been dismissed by the Court, including those brought by Bernie Parrish, which will confuse the jury. Plaintiffs will withdraw this objection if those references are redacted.		

Ex. No.	Description	Objections	Response	Court's Ruling
2342	05/21/2008 Plaintiffs' Supplemental Objections and Responses to Defendants' Second Set of Interrogatories, with Rowley Verification <b>[No Bates]</b>	<b>403:</b> This exhibit contains numerous legal objections to the scope of content of the interrogatories, which could confuse the jury. Plaintiffs will withdraw this objection if those objections are redacted.  <b>403:</b> This document includes references to claims that have been dismissed by the Court, including those brought by Bernie Parrish, which will confuse the jury. Plaintiffs will withdraw this objection if those references are redacted.		
2343	05/19/2008 Plaintiffs' Responses and Objections to Defendant's Third Set of Interrogatories, with Franco Verification <b>[No Bates]</b>	<b>403:</b> This exhibit contains numerous legal objections to the scope of content of the interrogatories, which could confuse the jury. Plaintiffs will withdraw this objection if those objections are redacted.		
2344	05/21/2008 Plaintiffs' Responses and Objections to Defendants' Fourth Set of Interrogatories, with Hilbert Verification <b>[No Bates]</b>	<b>403:</b> This exhibit contains numerous legal objections to the scope of content of the interrogatories, which could confuse the jury. Plaintiffs will withdraw this objection if those objections are redacted.		
2345	06/03/2008 Plaintiffs' Supplemental Responses and Objections to Defendants' Fourth Set of Interrogatories <b>[No Bates]</b>	<b>403:</b> This exhibit contains numerous legal objections to the scope of content of the interrogatories, which could confuse the jury. Plaintiffs will withdraw this objection if those objections are redacted.		

Ex. No.	Description	Objections	Response	Court's Ruling
2346	03/16/2008 Annual Report: 2008 [PI141527 - PI141893]	<b>Hearsay:</b> Defendants' statements, as found in their annual report, are hearsay and should be excluded.		
2347	07/10/2007 ESPN/Starwave Partners License Agreement, Effective 03/01/2006 [PI101921 - PI101934]			
2348	02/24/2007 Email to Parrish re: Breaking Away from the Neglect and Abuse of the NFLPA (Adderley Deposition, Ex. 163) [CLASS000017]	<p><b>Hearsay:</b> statements attributable to third parties are hearsay, and should be excluded.</p> <p><b>Authentication:</b> From the face of the document, the sender is not identified. Defendants will need to authenticate this document before it should be admitted into evidence.</p> <p><b>402/403:</b> This email is an announcement about the lawsuit, and does not affect the merits of the remaining claims, and should be excluded.</p>		
2349	12/22/03 NFL Players Association Retired Player Group Licensing Authorization Form signed by Dan Goich [PI028203]			
2350	6/27/07 Email from Bunz to Bolinger re: Attn. Bruce Laird-Baltimore Colts Alumni [LAIRD000789-LAIRE000790]			

Ex. No.	Description	Objections	Response	Court's Ruling
2351	3/4/07 Email from Parrish to Laird re: I'm after the same bastard today that I told you I was after months ago [LAIRD001535-LAIRD001538]	<b>Hearsay:</b> Mr. Parrish's statements are hearsay, and should be excluded.  <b>402/403:</b> This exhibit includes inflammatory statements (characterizing Mr. Upshaw as a "racketeer") and references to Plaintiffs' counsel's contingent interest in the case ("The class action law suit is a \$2 million risk on the part of the law firms."), and should be excluded, especially in light of its lack of probative value to the merits of this case.		
2352	7/12/07 Email to All Retired NFL Players re: It is time to organize [LAIRD000795]	<b>Hearsay:</b> John Wooten's statements are hearsay, and should be excluded.  <b>403:</b> This email references a purported group, NFL Alumni, which does not seem to be an active group. The formation or existence of NFL Alumni seems to be a collateral issue that would engender a waste of time, and should be excluded under Rule 403.		
2353	9/2/07 Email from Laird to Bernard Parrish re: FW:ALLIANCE [CLASS 003163]			
2354	10/4/07 Email from Laird to Haynes re: [Retired NFL Players] McElhenny to Serve as Honorary TeamCaptain [CLASS 003170-CLASS 003171]			

Ex. No.	Description	Objections	Response	Court's Ruling
2355	11/2/07 Email from Laird to Parrish re: Brent Boyd new group <b>[CLASS 003022-CLASS 003025]</b>	<b>Hearsay:</b> Maureen Kilcullen's statements are hearsay, and should be excluded.		
2356	4/9/08 Email from Tamarkin to Parrish re: FW: Congressional Report: NFL Players' Serious Health Concerns Not Addressed by NFL and NFLPA <b>[LAIRD000507-LAIRD000509]</b>	<b>Hearsay:</b> This press release by John Conyers, Jr., which was transmitted by Jonathan Godfrey and Eric Tamarkin, contains hearsay statements which should be excluded.		
2357	8/16/06 Email from Mackey to Parrish re: bernie, please read the attached <b>[LAIRD001232-LAIRD1234]</b>	<b>Hearsay:</b> This email from Sylvia Mackey to Bernard Parrish is hearsay, and should be excluded. The email attaches a third-party article about football concussions promoting dementias in retired players, which is also hearsay.		
2358	5/28/08 Email from Parrish to various players and political figure re: I understand you are asking for solution, you might ask those who know the problems through years of research rather than owner beholden individuals some of whom just showed up in the last few month, your 145 page CRS report is repleat with words "uncle" <b>[LAIRD000946]</b>	<b>Hearsay:</b> Mr. Parrish's statements are hearsay, and should be excluded.  <b>403:</b> Mr. Parrish purports to speak for all retired players, but is not a member of this class. The introduction of his statements unduly prejudices the class, as he does not speak as their representative.		

Ex. No.	Description	Objections	Response	Court's Ruling
2359	1/20/08 Email from Baltimore Colts to Laird and others re: Forgotten Forefathers [LAIRD000242-LAIRD000249]	<b>Hearsay:</b> Maureen Kilcullen's statements are hearsay, and should be excluded. This email also attaches an article by Gus Garcia-Roberts regarding the abandonment of retired players by their union, which is also hearsay.		
2360	Minutes of Board of Player Representatives' Meeting February 2-4, 1981 [No Bates]	<b>Hearsay:</b> Any statements attributable to Defendants or third parties are hearsay and should be excluded.		
2361	Minutes of Board of Player Representatives' Meeting February 2-4, 1982 [No Bates]	<b>Hearsay:</b> Any statements attributable to Defendants or third parties are hearsay and should be excluded.		
2362	10/29/06 Email from Laird to Allen re: players inc. retired players and amounts of money received [PI095550-PI095551]	<b>Hearsay:</b> This exhibit contains hearsay statements from Doug Allen, and those statements should be excluded.		
2363	2/6/07 Email from Baltimore Colts to Parrish re: FW: players inc. retired players and amounts of money received [LAIRD000419-LAIRD000420]	<b>Hearsay:</b> This exhibit contains hearsay statements from Doug Allen, purporting to establish the total amount paid to retired players, and should be excluded.		
2364	2/6/07 Email from Baltimore Colts to Parrish (cc: Laird) re: FW: players inc. retired players and amounts of money received [CLASS 000367-CLASS 000368]	<b>Hearsay:</b> This exhibit contains hearsay statements from Doug Allen, purporting to establish the total amount paid to retired players, and should be excluded.		

Ex. No.	Description	Objections	Response	Court's Ruling
2365	6/18/07 Email from Baltimore Colts to Laird and "BadBoy40@verizon.net" re: Message to Andre Collins and Matt Stover sent May 2 [LAIRD001579-LAIRD001581]			
2366	1/17/08 Email from Baltimore Colts to Laird and "BadBoy40@verizon.net" re: Message to Andre Collins and Matt Stover sent May 2 [LAIRD000050-LAIRD000053]			
2367	1/21/07 Email from Baltimore Colts to Laird and "BadBoy40@verizon.net" re: FW: Re: [Retired NFL Players] Announcement [LAIRD000066-LAIRD000068]	<b>Hearsay:</b> Sharon Hawkins's statements on the first page of this exhibit, which purport to show Wayne Hawkins's medical expenses, are hearsay and should be excluded.		
2368	Undated letter from Laird to Fellow retired players re: 2007 goals and events [LAIRD001588-LAIRD001590]			
2369	Undated document re: Fourth & Goal [LAIRD001569-LAIRD001576]	<b>Authentication:</b> Defendants must authenticate this document before admitting it into evidence.		

Ex. No.	Description	Objections	Response	Court's Ruling
2370	NFLPA Constitution, March 1994 [LAIRD001239-LAIRD001259]	<b>402/403:</b> Any precatory statements in the NFLPA constitution regarding the role of retired players does not affect whether the NFLPA breached their contracts with the plaintiff class, or breached their fiduciary duty with the plaintiff class. Thus, the Court should exclude the NFLPA constitution as irrelevant.		
2371	10/25/06 Email from Rentzel to Laird re: FW: Players, Inc. [LAIRD000605]			
2372	Fourth & Goal One Vision/One Voice Baltimore, Maryland March 1, 2007 [LAIRD000724-LAIRD000725]			
2373	4/20/07 Baltimore Sun article entitled "Ravens' NFLPA rep tying to bridge divide with retired players" & email chain between Baltimore Colts Alumni [LAIRD001197-LAIRD001202]	<b>Hearsay:</b> This email thread includes numerous hearsay statements including (1) a Baltimore Sun article relating to the Baltimore Ravens' NFLPA representative, authored by Ken Murray, which contains statements from Matt Stover; (2) statement by Lucious and Kathy Smith regarding media attention; (3) statements from "Turney," regarding pension and disability issues for retired players; and (4) statements from Joe DeLamielleure regarding the need to bring attention to the issue of pension and disability benefits for retired players. These hearsay statements should be excluded.		

Ex. No.	Description	Objections	Response	Court's Ruling
2374	Undated email from Laird to various players re: support for retired players [LAIRD001514-LAIRD001515]	<p><b>Authentication:</b> The email on the first page of this exhibit is unsigned, and Defendants will need to authenticate this exhibit before they can admit it.</p> <p><b>Hearsay:</b> The email on the first page of this exhibit is from an unidentified party, and discusses a foundation set up a John Mackey and a need to organize retired players further. These statements are likely hearsay, and should be excluded.</p>		
2375	8/25/07 Email from Green to Parrish, Green, Laird and Huff re: Hearing issues [LAIRD001415]	<p><b>Hearsay:</b> Jim Green's statements are hearsay, and should be excluded.</p> <p><b>403:</b> This email references a meeting with the Commerce Committee, focusing on the disability process for retired players, and does not materially affect the merits of the remaining claims, and should be excluded under Rule 403.</p>		
2376	9/11/07 Email from Kilcullen to Laird re: FW: FROM THE GRIDIRON GREATS [LAIRD001387-LAIRD001388]	<p><b>Hearsay:</b> Jennifer Smith's statements are hearsay, and should be excluded.</p> <p><b>403:</b> This email references a purported decision by the Gridiron Greats to decline to enter into an "alliance" of organizations. This decision does not materially affect the merits of the remaining claims, and should be excluded under Rule 403.</p>		

Ex. No.	Description	Objections	Response	Court's Ruling
2377	1/29/08 Email from Baltimore Colts to alumni re: Fourth & Goal Talking Points for Super Bowl Week <b>[LAIRD000933-LAIRD000937]</b>			
2378	10/25/06 Email from Parrish to Laird re: Is this one understandable? Call me 352-378-6348 <b>[CLASS 003759-CLASS 003761]</b>	<b>Hearsay:</b> Mr. Parrish's email is itself hearsay, but also includes various facts and figures he purportedly gleaned from other sources, which are themselves hearsay. The entirety of the email should be excluded.		
2379	3/5/07 Email from Parrish to Baltimore Colts Alumni re: [Retired NFL Players] NFLPA claim they spend \$28 million on "grass roots youth football initiatives" 21% players Inc. income. <b>[CLASS 002950-CLASS 002956]</b>	<b>Hearsay:</b> Mr. Parrish's statements are hearsay, and should be excluded. Additionally, Mr. Parrish includes references to many other factual sources, which are also hearsay. The entirety of this email should be excluded.  <b>402/403:</b> This exhibit includes inflammatory statements (characterizing the NFLPA as a "cabal" and insinuating that the organization lies in its accounting) and should be excluded, especially in light of its lack of probative value to the merits of this case.		

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Ex. No.	Description	Objections	Response	Court's Ruling
2380	5/7/07 Email from Parrish to Roberts re: Excellent article, gutsy, but you just scratched the surface <b>[CLASS 003666-CLASS 003672]</b>	<b>Hearsay:</b> Mr. Parrish's statements are hearsay, and should be excluded. Additionally, Mr. Parrish includes references to many other factual sources, which are also hearsay. The entirety of this email should be excluded.  <b>402/403:</b> This exhibit includes inflammatory statements (characterizing attorney fees as "outrageous" and insinuating that Mr. Upshaw should have been prosecuted by the Department of Labor) and should be excluded, especially in light of its lack of probative value to the merits of this case.		
2381	7/7/07 Email from Baltimore Colts to Laird and "BadBoy40@verizon.net" re: FW:Re: Retired NFL Players <b>[LAIRD000796]</b>			

Ex. No.	Description	Objections	Response	Court's Ruling
2382	Undated email to Laird from Parrish re: press release and partnership [LAIRD000707]	<p><b>Hearsay:</b> Mr. Parrish's statements are hearsay, and should be excluded. Additionally, Mr. Parrish includes references to many other factual sources, which are also hearsay. The entirety of Mr. Parrish's email should be excluded.</p> <p><b>402/403:</b> Mr. Parrish's email, at the beginning of this exhibit includes references to Plaintiffs' counsel contingent interest ("These two law firms are gambling up to \$2 million on this."). Additionally, this email is about the fact of the lawsuit itself, and does not materially affect the merits of any of the remaining claims. As a result, it should be excluded.</p>		
2383	9/28/07 Email from Nixon to Parrish re: [Retired NFL Players] Fwd: Wording on 2003, 2004, 2005, 2006 Group Licensing Agreement [CLASS 003197-CLASS 003198]	<b>Hearsay:</b> This exhibit consists of emails from Jeff Nixon and Bernie Parrish, both of which are hearsay, and should be excluded.		
2384	11/7/06 Email from Parrish to Laird re: Fwd: Re: What do you think? [CLASS 003725]	<b>403:</b> Bernie Parrish is not a class member, and this email asking Mr. Laird about his opinion regarding the Steering Committee and Madden EA video games does not materially affect the merits of any remaining claims, and should be excluded as a waste of time.		

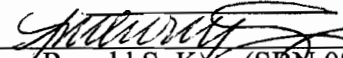
Ex. No.	Description	Objections	Response	Court's Ruling
2385	Undated email from Laird to Parrish re: Plan English explanation of our class action Parrish v. NFLPA/Players, Inc. [LAIRD000925-LAIRD000926]	<b>Hearsay:</b> This exhibit mostly consists of Mr. Parrish's statements, which are hearsay, and should be excluded. Additionally, Mr. Parrish includes references to many other factual sources, which are also hearsay. The entirety of Mr. Parrish's email should be excluded.  <b>402/403:</b> This email exchange regards the existence and progress of the instant lawsuit, and does not include any evidence that materially affects the merits of the remaining claims, and should be excluded.		
2386	Oct. 2003 Players Inc Newsletter [LAIRD001121-LAIRD001124]	<b>Hearsay:</b> NFLPA's newsletters contain hearsay statements of Defendants, and should be excluded.		
2387	July 2004 Players Inc Newsletter [LAIRD001125-LAIRD001128]	<b>Hearsay:</b> NFLPA's newsletters contain hearsay statements of Defendants, and should be excluded.		
2388	Sep. 2006 NFL Players Newsletter [LAIRD001542-LAIRD001545]	<b>Hearsay:</b> NFLPA's newsletters contain hearsay statements of Defendants, and should be excluded.		

Ex. No.	Description	Objections	Response	Court's Ruling
2389	11/20/2006 Email from Parrish to Stabler re: [Retired NFL Players] Re: Players, Inc. retired players agreements [CLASS003722-CLASS003723]	<b>Hearsay:</b> This exhibit consists of Mr. Parrish's and Mr. Ken Stabler's statements, which are hearsay, and should be excluded. Additionally, Mr. Parrish includes references to many other factual sources, which are also hearsay. The entirety of this exhibit should be excluded.  <b>402/403:</b> This email exchange is regarding the existence and progress of the instant lawsuit, and does not include any evidence that materially affects the merits of the remaining claims, and should be excluded.		
2390	03/01/2001 License Agreement between Upper Deck Co. and NFLPA [PI007088-PI007144]			

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2 Dated: 25 SEPT, 2008  
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Respectfully submitted,

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