

Exhibit A

1 FRISS - HIGHLY CONFIDENTIAL

2 Q. Have you met with any -- anyone on
3 behalf of the National Football League Players
4 Association or Players, Inc. at any time in
5 connection with this litigation in which we're
6 taking the deposition?

7 A. No.

8 Q. Did you actually draft this
9 declaration or did someone draft it for you?

10 A. Someone drafted it for me.

11 Q. Did anyone draft it for you who was
12 not employed by Topps or your counsel?

13 A. Yes.

14 Q. Who drafted it?

15 A. It was an attorney for -- actually
16 LeBoeuf Lamb the firm used to be, but I -- they
17 made an initial draft, I made comments to the
18 draft, a few rounds of comments and they
19 ultimately finalized it.

20 Q. And how did you communicate your
21 comments back to the lawyers at -- is it Dewey
22 & LeBoeuf?

23 MR. GREENSPAN: Yes.

24 A. Yes.

25 Q. How did you communicate your