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UNITED STATES DISTRICT COURT

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NORTHERN DISTRICT OF CALIFORNIA

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SAN FRANCISCO DIVISION

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

CIVIL ACTION NO. C07 0943 WHA

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Plaintiffs,

**DECLARATION OF WALTER ROBERTS
 III IN SUPPORT OF PLAINTIFFS'
 OPPOSITION TO DEFENDANT'S MOTION
 TO TRANSFER VENUE**

17

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vs.

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NATIONAL FOOTBALL LEAGUE
 PLAYERS INCORPORATED d/b/a
 21 PLAYERS INC., a Virginia corporation,

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Defendant.

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I, Walter Roberts III, declare and state as follows:

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1. I am a party to this lawsuit, and submit this declaration in support of Plaintiffs'

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Opposition to Defendant's Motion to Transfer Venue. I have personal, first-hand knowledge of

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the matters stated herein, and, if called upon to do so, I could and would competently testify

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1 thereto. I was a wide receiver and kick returner in the NFL from 1964 to 1970. During this time,
2 I played with the Cleveland Browns from 1964 to 1966 and was a member of the Cleveland
3 Browns team that defeated Johnny Unitas and Coach Don Shula's Baltimore Colts 27-0 in the
4 1964 World Championship.

5 2. Following my stint with the Browns, I played with the New Orleans Saints during
6 their inaugural season in 1967 and helped the Saints win their first game in franchise history by
7 scoring three touchdowns in a 31-24 victory over the Philadelphia Eagles. I also played for
8 Coach Vince Lombardi and the Washington Redskins in 1969 and 1970.

9 3. Putting aside my time playing professional football, I have been a resident of
10 California since I was nine years old. I have been a resident of Northern California since about
11 1979. I currently live in San Jose, California. Any documents I have that are related to this case
12 are located there. ...

13 4. In my senior year at Compton High School in Compton, California in 1960, I was
14 California state and national long-jump champion. Following high school, I attended San Jose
15 State for four years. I left San Jose State in 1964 to begin my professional football career.

16 5. Following my professional football career, I returned to Southern California in
17 1971 before moving to Northern California in 1979. In the early 1980s, I co-founded a building
18 supplies company called JR Builders Specialties, Inc. This company, which was located on Third
19 Avenue in San Mateo, California, remained in business until 1988 or 1989.

20 6. Since 1988 or 1989, I have worked in various jobs throughout Northern California.
21 For example, I have worked, and continue to work, part-time as a carrier for the San Francisco
22 Chronicle. I currently work for the Chronicle every day from 3:30 a.m. to 6:30 a.m. There is
23 currently only one other person who has been trained to perform my specific job with the
24 Chronicle. It would be difficult for me to travel to the East Coast in connection with this case,
25 because I would have to make sure that that person was available to work for me in my absence.

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I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct and that this declaration was executed on May 9, 2007.


Walter Roberts III