

1 MANATT, PHELPS & PHILLIPS, LLP
 2 RONALD S. KATZ (Bar No. CA 085713)
 3 E-mail: rkatz@manatt.com
 4 RYAN S. HILBERT (California Bar No. 210549)
 5 E-mail: rhilbert@manatt.com
 6 NOEL S. COHEN (California Bar No. 219645)
 7 E-mail: ncohen@manatt.com
 8 1001 Page Mill Road, Building 2
 9 Palo Alto, CA 94304-1006
 10 Telephone: (650) 812-1300
 11 Facsimile: (650) 213-0260

12 Attorneys for Plaintiffs.

13 UNITED STATES DISTRICT COURT
 14 NORTHERN DISTRICT OF CALIFORNIA
 15 SAN FRANCISCO DIVISION

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

20 Plaintiffs,

21 vs.

22 NATIONAL FOOTBALL LEAGUE
 23 PLAYERS INCORPORATED d/b/a
 24 PLAYERS INC., a Virginia corporation,

25 Defendant.

CIVIL ACTION NO. C07 0943 WHA

**DECLARATION OF RYAN S. HILBERT IN
 SUPPORT OF PLAINTIFFS' OPPOSITION
 TO DEFENDANT'S MOTION TO
 TRANSFER VENUE**

26 I, Ryan S. Hilbert, do hereby declare and certify as follows:

27 1. I have personal knowledge of the following facts, and if called as a witness,
 28 could and would competently testify thereto.

2. I am an attorney at law, duly licensed to practice before all the courts of the State
 of California, and I am an associate with the law offices of Manatt, Phelps & Phillips, LLP,

1 attorneys of record for Plaintiffs in the above-entitled action.

2 3. Attached hereto as Exhibit 1 is a true and correct printout from the website of the
3 NFL Players Association (“NFLPA”) as it existed on May 8, 2007.

4 4. I am informed and believe that Doug Allen and Pat Allen, the former President
5 and Executive Vice President of PLAYERS INC, respectively, reside at 542 N. Gardner Street,
6 Los Angeles, California 90036.

7 5. I am also informed and believe that Howard Skall is a marketing manager in the
8 Football Division of Creative Artists Agency (CAA). According to its website at
9 www.caa.com, CAA is located at 2000 Avenue of the Stars, Los Angeles, CA 90067.

10 6. I have reviewed the LM-2 Form filed by the NFLPA in 2006. According to this
11 report, Electronic Arts, which is headquartered in Redwood City, California, paid the NFLPA
12 \$33,487,103 in 2005. This report is available on the U.S. Department of Labor’s website at
13 www.dol.gov.

14 7. Attached hereto as Exhibit 2 is a true and correct printout regarding the median
15 time intervals in months for trial in the various district courts. This printout is available at:
16 <http://www.uscourts.gov/caseload2006/tables/C05Mar06.pdf>.

17 8. Attached hereto as Exhibit 3 is a true and correct printout from the website of
18 PLAYERS INC as it existed on May 8, 2007.

19 I declare under penalty of perjury under the laws of the United States that the foregoing is
20 true and correct and that this declaration was executed on May 10, 2007.

21
22 /s/Ryan S. Hilbert
23 Ryan S. Hilbert

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