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

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

CIVIL ACTION NO. C07 0943 WHA

21 Plaintiffs,

**DECLARATION OF BERNARD PAUL  
 PARRISH IN SUPPORT OF PLAINTIFFS'  
 OPPOSITION TO DEFENDANT'S MOTION  
 FOR SANCTIONS**

22 vs.

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

26 Defendant.

27 I, Bernard Paul Parrish, declare and state as follows:

28 1. I am a party to this lawsuit. and submit this declaration in support of Plaintiffs' Opposition to Defendant's Motion for Sanctions. I have personal, first-hand knowledge of the matters stated herein, and, if called upon to do so, I could and would competently testify thereto.

1           2.       I was a defensive back with the Cleveland Browns from 1959 through 1966. I  
2 graduated with a degree in Building Construction from the University of Florida, School of  
3 Architecture and Fine Arts. I was the CEO and President of a commercial construction company  
4 for over 20 years that employed over 3,000 tradesmen, laborers and engineers both union and  
5 non-union, building hotels, medical and office buildings, housing for officers and enlisted men on  
6 Air Force Bases in eight states. Prior to entering the NFL, I was a baseball All-American at the  
7 University of Florida (where I am also a member of the school's Hall of Fame) and played one  
8 year of professional baseball.

9           3.       I have been an advocate for retired players for many years and am the author of a  
10 best selling book, *They Call It A Game*, published in 1971, which advocated players rights.

11           4.       I am Co-President (with Herb Adderley) of the Retired Professional Football  
12 Players for Justice ("RPF PJ"). I founded this not-for-profit organization in 2007 solely to  
13 advance the rights of retired NFL players. Neither I nor any officer, director or outside litigation  
14 counsel receive a salary or any payments from RPF PJ.

15           5.       RPF PJ is currently engaged in no commercial or licensing activities, and if it  
16 engages in such activities in the future, its intention is to do that on a cooperative, non-profit basis  
17 in which all retired players share equally. Although the RPF PJ has no involvement in the present  
18 litigation, exposing the unfair practices of PLAYERS INC through encouraging this lawsuit falls  
19 squarely within the framework of the RPF PJ's legitimate aims.

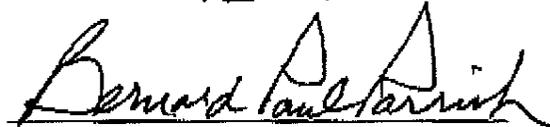
20           6.       Ronald Katz of Manatt, Phelps & Phillips and Lewis LeClair of McKool Smith did  
21 not found and have no financial interest in the RPF PJ. They are listed on the RPF PJ website,  
22 [www.playersforjustice.org](http://www.playersforjustice.org), as outside counsel. These individuals have derived no financial gain  
23 from any association with RPF PJ. They are merely outside counsel should RPF PJ ever bring a  
24 litigation, which it has not yet done.

25           7.       Sam Mutch, Esq., currently serves in the strictly administrative position of  
26 secretary-treasurer, but he is being replaced by Margaret Parrish. He has derived no economic  
27 benefit from this position nor will he ever derive any economic benefit from this position.

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1           3. I have executed and mailed to the NFLPA two group licensing agreements  
 2 ("GLAs") with PLAYERS INC. I located these GLAs after reading Gene Upshaw's Declaration  
 3 in Support of Defendant's Motion for Sanctions. Attached hereto as Exhibit A is a true and  
 4 correct copy of the executed GLAs.

5           I declare under penalty of perjury under the laws of the United States that the foregoing is  
 6 true and correct and that this declaration was executed on May 8, 2007, at Gainesville, Florida.

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 9 Bernard Paul Parrish

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