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*Attorneys for Plaintiffs*

21 UNITED STATES DISTRICT COURT  
 22 NORTHERN DISTRICT  
 23 SAN FRANCISCO DIVISION

24 HERBERT ANTHONY ADDERLEY, on  
 25 behalf of himself and all others similarly  
 26 situated,

Plaintiffs,

vs.

27 NATIONAL FOOTBALL LEAGUE  
 28 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

**DECLARATION OF RYAN S. HILBERT  
 IN SUPPORT OF CLASS COUNSELS'  
 RESPONSE TO NOVEMBER 17, 2009  
 ORDER**

1 I, Ryan S. Hilbert, declare as follows:

2 1. I am an attorney duly licensed to practice law before the Courts of the State of  
3 California and am a counsel of record in this matter. I am an associate with the law firm of  
4 Manatt, Phelps and Phillips, LLP (“Manatt”), co-counsel for plaintiff Herb Adderley and the  
5 certified class in this action. I am submitting this Declaration in support of Class Counsels’  
6 response to the Court’s November 17, 2009 Order. The following declaration is based upon my  
7 personal knowledge. If called as a witness I could and would competently testify to the facts set  
8 forth herein.

9 2. Attached hereto as Exhibit A is a true and correct copy of Plaintiffs’ First Set of  
10 Interrogatories to Defendant National Football League Players Association, dated November 20,  
11 2007.

12 3. Attached hereto as Exhibit B is a true and correct copy of National Football  
13 League Players Association’s Responses to Plaintiffs’ First Set of Interrogatories, dated  
14 December 20, 2007.

15 4. Attached hereto as Exhibit C is a true and correct copy of an email sent by  
16 Defendants’ counsel on October 16, 2008 regarding trial Exhibit 2057.

17 I declare under penalty of perjury under the laws of the United States of America that the  
18 foregoing is true and correct to the best of my knowledge.

19 Signed this 18th day of November, 2009, at Palo Alto, California.

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22 Ryan S. Hilbert  
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