1 2 3 UNITED STATES DISTRICT COURT 4 NORTHERN DISTRICT OF CALIFORNIA 5 6 BERNARD PAUL PARRISH, HERBERT Case No. C 07-00943 WHA ANTHONY ADDERLEY, and WALTER 7 ROBERTS, III on behalf of themselves and all others similarly 8 situated. DECLARATION OF JENNIFER M. KEOUGH RE: DISTRIBUTIONS FROM THE 9 SETTLEMENT FUND Plaintiffs, 10 ٧. 11 NATIONAL FOOTBALL LEAGUE 12 PLAYERS INCORPORATED, et al., 13 Defendants. 14 **DECLARATION OF JENNIFER M. KEOUGH** 15 RE: DISTRIBUTIONS FROM THE SETTLEMENT FUND 16 17 JENNIFER M. KEOUGH declares and states as follows: 18 1. I am Executive Vice President of the Garden City Group, Inc. ("GCG"). The 19 following statements are based on my personal knowledge and information provided by other 20 GCG employees working under my supervision, and if called on to do so, I could and would 21 testify competently thereto. I am over the age of 18, and competent to testify. 22 23 2. GCG was retained by the Parties to the above-captioned litigation (the "Litigation") to serve as the Class Action Administrator as described in the Order Preliminarily 24 25 Approving Proposed Settlement executed August 18, 2009. I submit this Declaration in order to provide the Court and the parties to the Litigation with information regarding mailing of the 26 27 Claim Form and Release ("Claim Form") and the distribution of Settlement Funds. 28

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DECLARATION OF JENNIFER M. KEOUGH

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3.	On or be	fore Decembe	r 11,	2009,	GCG	mailed	each	Class	Member	for	whom
had a know	n address a	Claim Form.	The	Clain	1 Form	n stated	that	the re	cipient n	nust	return
completed C	laim Form t	to the Claims	Admi	inistrat	or pos	tmarkec	l no la	ater th	an Febru	arv 9	2010.

- 4. GCG received 1,571 Claim Forms that were postmarked on or before the February 9, 2010 deadline, and has distributed funds 1,562 of the Class Members who submitted a Claim Form by the deadline. The 1,571 timely submitted Claim Forms included 9 Claim Forms that were processed by GCG as incomplete lacking a signature or Social Security Number. In addition, GCG received 17 Claim Forms that were postmarked after the February 9, 2010 deadline. Class Counsel authorized GCG to take steps to resolve any outstanding issues and pay these Class Members their respective portion of the Settlement Fund. The name of each Class Member who has received a distribution from the Settlement Fund to date is attached hereto as **Exhibit A**.
- 5. To date, the Claims Administrator has distributed \$7,397,784.86 from the Settlement Fund.
- 6. As of March 16, 2010 total of 482 Class Members have yet to submit a completed claim form, and as a result, approximately \$1,619,787.71 remains in the Settlement Fund. The name of each Class Member who has yet to submit a claim form is attached hereto as **Exhibit B**.

I declare under the penalty of perjury pursuant to the laws of the State of California that the foregoing is true and correct.

Executed on March 17, 2010 at Seattle, Washington.

JENNIFER M. KEOUGH