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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

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

Plaintiffs,

v.

NATIONAL FOOTBALL LEAGUE PLAYERS INCORPORATED, et al.,

Defendants.

Case No. C 07-00943 WHA

**DECLARATION OF JENNIFER M. KEOUGH
IN SUPPORT OF CLASS COUNSELS’
MOTION FOR APPROVAL RE SECOND
DISTRIBUTION FROM THE SETTLEMENT
FUND**

I, JENNIFER M. KEOUGH, declare and states as follows:

1. I am Executive Vice President of the Garden City Croup, Inc. (“GCG”). The following statements are based on my personal knowledge and information provided by other GCG employees working under my supervision, and if called on to do so, I could and would testify competently thereto. I am over the age of 18, and competent to testify.

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 Approving Proposed Settlement executed August 18, 2009 (the “Stipulation”). I submit this Declaration in order to provide the Court and the parties to the Litigation with information regarding mailing of the Claim Form and Release (“Claim Form”) and the distribution of Settlement Funds.

1 3. On or before December 11, 2009, GCG mailed a Claim Form to each Class
2 Member for whom we had a known address. The Claim Form stated that the recipient must
3 return a completed Claim Form to the Claims Administrator on or before February 9, 2010.

4 4. GCG received 1,571 Claim Forms that were postmarked on or before the
5 February 9, 2010 deadline, and distributed funds to each of the Class Members whom submitted
6 a Claim Form by that deadline. Four hundred eighty two Class Members did not submit a
7 completed claim form by that deadline, and as a result, approximately \$1,619,787.71 remained
8 in the Settlement Fund.

9 5. Despite the fact that each Class Member's address was run through the United
10 States Postal Service's National Change of Address database, 261 Claim Forms were returned to
11 the GCG as undeliverable with no forwarding address. GCG conducted additional searches to
12 locate addresses for the 261 Class Members whose forms were returned as undeliverable. In
13 accordance with the direction of Class Counsel, the GCG did not resend a Claim Form to those
14 Class Members whose initial Claim Forms were returned as undeliverable, unless the GCG was
15 able to find a new address for such Class Members through its additional searches.

16 6. On or before March 17, 2010, GCG mailed each Class Member who had yet to
17 submit a completed Claim Form (and for whom it had a known address) a Second Claim Form.
18 The Claim Form stated that the recipient must return a completed Claim Form to the Claims
19 Administrator on or before June 1, 2010.

20 7. GCG received a total of 1,792 Claim Forms that were postmarked on or before
21 the June 1, 2010 deadline or the earlier February 9, 2010 deadline. A list of each of the Class
22 Members that submitted a timely Claim Form is attached hereto as **Exhibit A**. Each of these
23 Class Members has been issued a check for their respective share of the initial distribution of the
24 Gross Settlement Amount.

25 8. GCG received seven "incomplete" claim forms that were postmarked on or
26 before the June 1, 2010. A list of the seven Class Members that submitted "incomplete" claim
27 forms is attached hereto as **Exhibit B**.

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