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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,

Plaintiff,

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'
RESPONSE TO JULY 21, 2010 ORDER**

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

1. I am Executive Vice President of the Garden City Group, Inc. ("GCG"). I am submitting this declaration in support of Class Counsel's Response to July 21, 2010 Order. 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 to serve as the Class Action Administrator as described in the Order Preliminarily Approving Proposed Settlement executed August 18, 2009 (the "Stipulation").

3. Following the Court's July 21, 2010 Order, Class Counsel instructed GCG to use social security information provided by Defendants to run Lexis-based searches in order to

1 identify addresses for those class members whose claim forms were previously returned as
2 “undeliverable”.

3 4. In the instances in which GCG was unable to identify updated addresses with the
4 Lexis-based searches, GCG conducted additional searching using other skip tracing engines.
5 GCG conducted two separate advanced address searches in an attempt to find updated address
6 information for all 202 Class members.

7 5. As a result of these efforts, and based on information provided by Defendants
8 and calls received by retired players, GCG now has updated contact information for 76
9 additional Class members. A true and correct list of the 76 class members for whom GCG has
10 located updated address information is attached hereto as Exhibit A.

11 6. A true and correct copy of GCG’s invoice for services through completion of this
12 project is attached hereto as Exhibit B.

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14 I declare under penalty of perjury under the laws of the State of California that the
15 foregoing is true and correct, and that this declaration was executed August 12, 2010 in Seattle,
16 Washington.

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19 JENNIFER M. KEOUGH

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