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20 Attorneys for Plaintiffs

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

24 CIVIL ACTION NO. C07 0943 WHA

25 HERBERT ANTHONY ADDERLEY,
 26 on behalf of themselves and all others
 27 similarly situated,

28 Plaintiffs

29 vs.

30 NATIONAL FOOTBALL LEAGUE
 31 PLAYERS ASSOCIATION, a Virginia
 32 corporation, and NATIONAL
 33 FOOTBALL LEAGUE PLAYERS
 34 INCORPORATED d/b/a PLAYERS
 35 INC, a Virginia corporation,

36 Defendants.

37 **DECLARATION OF RONALD S.
 38 KATZ IN SUPPORT OF CLASS
 39 COUNSELS' FURTHER
 40 INTERIM REPORT
 41 REGARDING PAYMENTS TO
 42 THE GLA CLASS AND MOTION
 43 REGARDING IRREGULAR
 44 CLAIM FORMS**

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1 I, Ronald S. Katz, 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 a partner with the law firm of Manatt,
4 Phelps and Phillips, LLP (“Manatt”), co-counsel of record for the GLA Class in this case. I am
5 submitting this Declaration in support of Class Counsels’ Further Interim Report Regarding
6 Payments To The GLA Class And Motion Regarding Irregular Claim Forms. The following
7 declaration is based upon my personal knowledge. If called as a witness I could and would
8 competently testify to the facts set forth herein.
9

10 2. Following this Court’s October 12, 2010 Order that, among other things,
11 authorized Class Counsel to send final payments to each of the Class Members who is entitled to
12 a share of the Settlement Fund, Class Counsel discovered one Class Member who should have
13 been identified on Exhibit 5 to the Katz Declaration as having returned a claim form and thus
14 being entitled to funds, but who was incorrectly and inadvertently not identified as such. This
15 Class Member’s name is Derrick Graham.
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17 3. Upon discovering the omission of Mr. Graham, Class Counsel contacted the
18 Claims Administrator to verify that there were no other Class Members who were inadvertently
19 not identified on Exhibit 5 to my October 5, 2010 Declaration as not having returned a claim
20 form. According to the Claims Administrator, three additional Class Members had returned
21 claim forms directly to the Claims Administrator after the September 20, 2010 deadline for those
22 76 Class Members with updated addresses to return third claim forms. These Class Members are
23 Dedrick Dodge, Pat Brady, and Clarence Williams. The Claims Administrator received a claim
24 form from Mr. Dodge on October 1, 2010, a claim form from Mr. Brady on October 4, 2010 and
25 a claim form from Mr. Williams on October 6, 2010.
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4. Attached hereto as **Exhibit 1** is an updated spreadsheet, which shows how much each player who has submitted a third claim form is expected to receive and which includes the four class members.

5. In the course of working with the Claims Administrator on the issues above, Class Counsel also learned that three separate players submitted claim forms to the Claims Administrator even though they were not members of the GLA Class. Attached hereto as **Exhibit 2** is a copy of these claim forms, which appear to be irregular. Based on the Court's definition of the Class, Class Counsel does not intend to pay these former players, but seeks confirmation of that determination from the Court.

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

Signed this 22nd day of October, 2010, at Palo Alto, California.

/s/ RONALD S. KATZ
Ronald S. Katz