

EXHIBIT 4

To Affidavit of Amanda L. Bush



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THE DALLAS MORNING NEWSOctober 30, 2006 Monday
FIRST EDITION**SECTION:** SPORTS DAY; Pg. 1C**LENGTH:** 407 words**HEADLINE:** Nelson has bones to pick with Mavs Former coach might sue Cuban over salary deferred from Perot era**BYLINE:** EDDIE SEFKO, Staff Writer**BODY:**

Former Mavericks coach Don Nelson has taken an NBA owner to court before, and it might happen again with Mark Cuban.

Nelson apparently is willing to pursue whatever measures are needed to recoup as much as \$6million in deferred payments earned before Ross Perot Jr. sold the franchise to Cuban in 2000.

Nelson, now coach of the Golden State Warriors, was reached over the weekend and said he may have to pursue legal avenues to get the money that he says he is owed.

"Mark Cuban has been very good to me and my family, but he doesn't like me very much," Nelson said. "I've asked nicely for [the payment]. We'll see what happens from here."

Nelson worked for the Mavericks from 1997 until June, mostly as head coach. He also had a contract to be a consultant to the organization for the next three years, but he surrendered that deal when he was hired by the Warriors.

Cuban declined to comment.

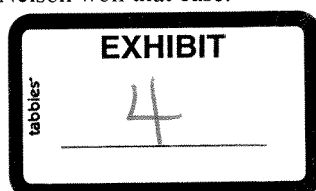
The root of the problem apparently stems from wording in Nelson's original coaching contract with the team. Nelson wanted some of that contract deferred for his retirement. Before he got back into coaching with the Warriors, he asked for the deferred money.

"There's no question that there was money that was to be paid over time in the contract Nellie signed during the Ross Perot ownership," said Frank Zaccanelli, a minority partner with the Mavericks in the '90s who negotiated the contract with Nelson. "When we added the coaching responsibilities, Nellie wanted the money deferred, and it was a big help to the cash flow for the franchise.

"Now, what happened to it from there, I don't know."

Nelson admitted that "it wasn't easy going" in his relationship with Cuban in his final seasons with the Mavericks. The two had a bitter negotiation for Nelson's contract in 2003, and the line of communication was never the same. Their relationship deteriorated and their contact was minimal during Nelson's last two years in Dallas.

In a strange twist, Nelson now works for Golden State owner Chris Cohan, whom Nelson sued after he parted ways with the Warriors in 1995. It was 21/2 years before Nelson won that case.



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Nelson handed the head-coaching reins to assistant Avery Johnson with 18 games left in the 2004-05 season. Cuban continued to pay Nelson's coaching contract until it expired July 1.

If the situation is not resolved, it would likely go to an arbitrator.

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Season opener: San Antonio at Mavericks, 7 p.m. Thursday (TNT)

GRAPHIC: PHOTO(S): (1. FILE 2003/Staff photo) Mark Cuban (left) was paying Don Nelson \$5 million a season when Nelson stepped out of the coaching picture in 2005. "Mark Cuban has been very good to me and my family," Nelson said this weekend, "but he doesn't like me very much." 2. Don Nelson 3. Mark Cuban

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