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United States District Court
For the Northern District of California

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

RICHARD DENT, JEREMY
NEWBERRY, ROY GREEN, JD HILL,
KEITH VAN HORNE, RON STONE,
RON PRITCHARD, JAMES MCMAHON,
MARCELLUS WILEY, and JONATHAN
REX HADNOT, on behalf of themselves
and all others similarly situated,

No. C 14-02324 WHA

Plaintiffs,

**REQUEST TO NFL FOR
FURTHER SUBMISSION**

v.

NATIONAL FOOTBALL League,
a New York unincorporated association,

Defendant.

In connection with its Section 301 argument, the NFL has argued that plaintiffs are not without remedies under the CBAs but, other than to say claims could be initiated, grievable, or arbitrable, the NFL does not explain the extent to which, if the claims alleged are true, any plaintiff could have stated a claim under one or more CBAs.

Therefore, the NFL is requested to be specific and answer the following question:

If all the abuses alleged by the clubs and club physicians in the operative complaint could be proven, what remedies would the players injured by such abuses have had under specific clauses of the CBAs against their clubs, assuming timely grievances and/or arbitration were

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initiated? The Court wishes to know the full extent to which the NFL specifically concedes that any CBA provision would have been grievable and what the remedies under the CBAs would be.

The NFL is requested to respond in ten pages or less by **NOON ON DECEMBER 5, 2014.**

Plaintiffs shall respond in ten pages or less by **NOON ON DECEMBER 8, 2014.**

Dated: December 3, 2014.



WILLIAM ALSUP
UNITED STATES DISTRICT JUDGE