

EXHIBIT F

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

in re NCAA Student-Athlete Name and
Likeness Licensing Litigation

Case No.
09-cv-1967-CW

* MAY CONTAIN CONFIDENTIAL INFORMATION *

- - -

VIDEOTAPED DEPOSITION OF
HARRY FLOURNOY, JR.
NOVEMBER 8, 2011
9:00 A.M.

KILPATRICK TOWNSEND & STOCKTON LLP
1100 PEACHTHREE STREET, SUITE 2800
ATLANTA, GEORGIA

REPORTED BY:

STEVEN S. HUSEBY, RPR
CCR-B-1372

Designation Color Key
Blue = NCAA Affirm Desigs.
Orange = Pls' Counter Desigs.
Fuchsia = NCAA Rebuttal Desigs

1 is Peter Boyle, I represent the Collegiate 09:18:22
2 Licensing Company, also known as CLC. One or 09:18:24
3 two ground keeping rules before we start. I'm 09:18:26
4 going to ask you a series of questions, my 09:18:31
5 co-counsel will ask you a series of questions. 09:18:34
6 I'm going to ask you if you don't understand a 09:18:38
7 question, let us know, is that fair? 09:18:40

8 A. That's fair. 09:18:42

9 Q. If we ask a question or I ask a 09:18:43
10 question and you answer it I'm going to assume 09:18:45
11 you understand, fair? 09:18:47

12 A. That's fair. 09:18:48

13 Q. Can you please state your full name 09:18:49
14 for the record? 09:18:51

15 A. Harry Flournoy, Jr. 09:18:52

16 Q. And where do you reside, Mr. Flournoy? 09:18:53

17 A. I reside in McDonough, Georgia. 09:18:55

18 Q. How long have you lived there? 09:18:58

19 A. Two years. 09:18:59

20 Q. Where did you live before you lived in 09:19:00
21 McDonough, Georgia? 09:19:03

22 A. Yorba Linda, California. 09:19:05

23 Q. How long did you live in Yorba Linda? 09:19:08

24 A. 12 years. 09:19:11

25 Q. And before Yorba Linda where did you 09:19:11

1 A. Yes. 09:49:42

2 Q. Did you talk to Coach Haskins when you 09:49:43
3 were being recruited? 09:49:45

4 A. I -- in Indiana I talked to him. 09:49:46

5 Q. Oh, he came to visit your house? 09:49:50

6 A. Yes. 09:49:51

7 Q. Piece of your mother's pie? 09:49:53

8 A. Yes. 09:49:55

9 Q. That sealed the deal? 09:49:56

10 A. Yes. 09:49:57

11 Q. All right. And Texas Western gave you 09:50:00
12 a scholarship, right? 09:50:10

13 A. Yes. 09:50:12

14 Q. Was it a full scholarship? 09:50:13

15 A. Yes. 09:50:15

16 Q. So paid for all tuition? 09:50:15

17 A. Yes. 09:50:17

18 Q. All four years? 09:50:18

19 A. Yes. 09:50:19

20 Q. Room and board? 09:50:20

21 A. Yes. 09:50:21

22 Q. Were there any stipends or anything 09:50:23
23 else that were attached to the scholarship, 09:50:25
24 receive any extra money? 09:50:28

25 A. What -- I'm not sure what you mean 09:50:30

1	A. No.	10:42:52
2	Q. The trading cards, did you authorize	10:42:52
3	the use of your name and likeness for the	10:42:57
4	trading cards?	10:43:00
5	A. Yes.	10:43:00
6	Q. The team picture, what about that, is	10:43:09
7	that the picture of the team posing with the	10:43:12
8	championship trophy?	10:43:14
9	A. No.	10:43:16
10	Q. What team picture are you talking	10:43:16
11	about?	10:43:19
12	A. Celebratory picture after the game,	10:43:19
13	championship game.	10:43:24
14	Q. And where did you see that picture?	10:43:25
15	A. I saw it in Washington, D.C.	10:43:30
16	Q. Where in Washington did you see it,	10:43:36
17	the White House?	10:43:39
18	A. No.	10:43:40
19	Q. Where in D.C.?	10:43:40
20	A. At a Hotel Washington.	10:43:41
21	Q. Which is now a W, it's a very nice	10:43:46
22	hotel. Was it for sale?	10:43:49
23	A. It was going to be.	10:43:58
24	Q. Who was going to sell it?	10:43:59
25	A. Steiner.	10:44:02

1 remember ever appearing on any type of program 11:01:02
2 that focused on your Texas Western basketball 11:01:06
3 team since leaving college at the time the 11:01:09
4 movie came out? 11:01:12

5 A. No. 11:01:17

6 Q. That '66 championship game against 11:01:23
7 Kentucky, that game's come to have a fairly 11:01:38
8 significant historical meaning, right? 11:01:41

9 MR. CLOBES: Objection, form. 11:01:43

10 BY MR. BOYLE: 11:01:45

11 Q. Let me rephrase. 11:01:45

12 A. In my opinion. 11:01:46

13 Q. You think it's socially and 11:01:47
14 historically significant, that game? 11:01:51

15 MR. CLOBES: Objection, form. 11:01:54

16 THE WITNESS: I can't speak for 11:01:55
17 everybody else, only for myself and only in my 11:01:56
18 opinion. 11:01:59

19 BY MR. BOYLE: 11:01:59

20 Q. That's all I'm seeking right now. 11:01:59

21 A. In my opinion, yes. 11:02:04

22 Q. Tell me a little bit about why you 11:02:06
23 think that. 11:02:08

24 A. Because any time you do something for 11:02:10
25 the first time it has significance. We were 11:02:18

1 the first ones to do that. And in my opinion 11:02:22
2 it was significant. 11:02:25
3 Q. And when you say that, you mean Coach 11:02:27
4 Haskins started five African-American players 11:02:31
5 in an NCAA tournament game? 11:02:35
6 A. Yes. 11:02:38
7 Q. And Kentucky was an all-white team, 11:02:39
8 right? 11:02:42
9 A. Yes. 11:02:42
10 Q. What was the final score? You won, 11:02:43
11 right? 11:02:46
12 A. Yes. 11:02:46
13 Q. What was the final score? 11:02:46
14 A. 72-65. 11:02:48
15 Q. Do you think that game has 11:02:50
16 significance to younger generations, people 11:02:53
17 who weren't alive at that time? 11:02:56
18 MR. CLOBES: Objection, form. 11:02:58
19 THE WITNESS: In my opinion, yes. 11:03:00
20 BY MR. BOYLE: 11:03:00
21 Q. You think there are lessons they can 11:03:02
22 take from that game? 11:03:04
23 A. In my opinion, yes. 11:03:05
24 Q. You think it's a good thing that 11:03:09
25 people from my generation who weren't alive 11:03:11

1 can see that game on DVD or maybe 11:03:14

2 rebroadcasts? 11:03:17

3 A. Again, in my opinion, yes. 11:03:18

4 Q. Who ought to get to decide whether 11:03:20

5 that game gets to be rebroadcast? 11:03:22

6 MR. CLOBES: Objection, form. 11:03:25

7 THE WITNESS: I can't answer that 11:03:26

8 question for you, sir. I don't know. 11:03:27

9 BY MR. BOYLE: 11:03:27

10 Q. You don't know? 11:03:29

11 A. No. 11:03:30

12 Q. Should you get a say? 11:03:30

13 A. In my opinion, yes. 11:03:35

14 Q. Should Pat Riley get a say? 11:03:37

15 A. I don't know. 11:03:39

16 Q. He appeared in the game, right? 11:03:41

17 A. I can only speak for me. I don't 11:03:43

18 know. 11:03:46

19 Q. You don't have an opinion on who 11:03:46

20 should get a say about whether that game gets 11:03:48

21 rebroadcast or not? 11:03:50

22 A. In my opinion, yes. 11:03:53

23 Q. Anyone appearing in the game ought to 11:03:57

24 get a say? 11:03:59

25 A. In my opinion, yes. 11:04:01

1	Q.	Anyone else?	11:12:26
2	A.	Yes.	11:12:28
3	Q.	Who?	11:12:29
4	A.	Mr. Worsley.	11:12:30
5	Q.	Anyone else?	11:12:35
6	A.	No.	11:12:37
7	Q.	When did you talk to Mr. Worsley about	11:12:38
8		the case?	11:12:40
9	A.	It was recently, this year.	11:12:42
10	Q.	Give me a little bit about the	11:12:52
11		substance of the conversation. What did you	11:12:54
12		say to him and vice-versa?	11:12:55
13	A.	I just told him there was a class	11:12:58
14		action case pending.	11:13:05
15	Q.	Did you ask him to join?	11:13:09
16	A.	No, I did not.	11:13:11
17	Q.	Did he express any interest in	11:13:13
18		joining?	11:13:18
19	A.	No, he did not.	11:13:19
20	Q.	Did he give you any opinion about what	11:13:21
21		he thought about this case?	11:13:23
22	A.	No, he did not.	11:13:25
23	Q.	So when you were playing, you were	11:13:28
24		subjected to some NCAA eligibility rules,	11:13:48
25		right?	11:13:51

1 A. Yes. 11:13:52

2 Q. Are you aware of whether those rules 11:13:57

3 in any way prevented you from selling the 11:13:58

4 rights to your name and likeness after having 11:14:01

5 left college? 11:14:06

6 A. No, I'm not aware. 11:14:09

7 Q. You're free to sell the rights to your 11:14:11

8 name and likeness, in fact, you've done it 11:14:14

9 before, right? 11:14:16

10 A. Yes. 11:14:16

11 Q. Okay. Has anything that CLC ever done 11:14:17

12 prevented you from selling the rights to your 11:14:22

13 name or likeness? 11:14:24

14 A. No. 11:14:25

15 Q. How about EA, did they ever prevent 11:14:25

16 you from selling your rights to your name and 11:14:28

17 likeness? 11:14:32

18 A. No. 11:14:32

19 Q. Did you ever have any plans to sell 11:14:33

20 the rights to your name and likeness but 11:14:36

21 changed those plans because of anything the 11:14:38

22 defendants in this case ever did to you? 11:14:41

23 A. I don't understand that question. 11:14:44

24 Could you repeat that? 11:14:47

25 Q. Sure, sure, we can break it down if 11:14:48

1	connection -- connected to the movie? Were	01:13:47
2	there toys or Happy Meals toys or video games	01:13:49
3	or anything like that?	01:13:53
4	A. Not that I know of.	01:13:54
5	Q. And just so we're clear, the movie was	01:13:55
6	about the 1965/66 Texas Western basketball	01:13:59
7	season, right?	01:14:04
8	A. Only in part.	01:14:06
9	Q. Well, significant part, more than half	01:14:10
10	of the movie focused on that season, right?	01:14:12
11	A. I guess you could say that, yes.	01:14:21
12	Q. And you granted Disney your rights as	01:14:24
13	it relates to your participation on that	01:14:27
14	championship team in 1965/'66, right?	01:14:29
15	A. Yes.	01:14:34
16	Q. If you could turn to AP 001856. This	01:14:59
17	assignment reads, "The undersigned for value	01:15:23
18	received hereby sells, assigns, transfers and	01:15:27
19	grants in perpetuity unto Walt Disney Pictures	01:15:30
20	and it's successors and assigns, herein called	01:15:35
21	assignee, all rights, title in and to the Life	01:15:38
22	Story rights." Do you see that?	01:15:43
23	MR. CLOBES: First three lines on	01:15:44
24	the top paragraph.	01:15:46
25	THE WITNESS: Maybe I got the	01:16:05

1 Q. Well, you're seeking to represent 03:07:11

2 these folks as a class representative, right? 03:07:14

3 A. Yes. 03:07:15

4 Q. You don't have any opinion on how much 03:07:16

5 the various class members ought to get for 03:07:18

6 these things? 03:07:20

7 A. No. 03:07:21

8 Q. Have you ever bought any of the DVDs 03:07:22

9 that you have seen that contain the game 03:07:29

10 between Kentucky and Texas Western from the 03:07:32

11 1966 NCAA finals? 03:07:35

12 A. No. 03:07:37

13 Q. Have you ever bought any of the 03:07:42

14 products that you believe contain your name or 03:07:44

15 likeness? 03:07:46

16 A. No. 03:07:47

17 Q. You've had some opportunities to 03:07:47

18 receive compensation for the use of your name 03:08:01

19 and likeness since leaving Texas Western, 03:08:04

20 right? We've established that? 03:08:06

21 A. Yes. 03:08:07

22 Q. Okay. A lot of other former NCAA 03:08:08

23 athletes never get those opportunities, 03:08:12

24 correct? 03:08:14

25 MR. CLOBES: Objection to form. 03:08:15

1	is James Slaughter. We met briefly earlier	03:24:06
2	today. I represent Electronic Arts. Good	03:24:09
3	afternoon.	03:24:12
4	A. Good afternoon.	03:24:12
5	Q. Do you have any objection to	03:24:13
6	Mr. Tredennick -- and I apologize if I	03:24:16
7	pronounced his name wrong -- do you have any	03:24:16
8	objection to Mr. Tredennick producing	03:24:16
9	nonprivileged documents in his possession	03:24:18
10	related to this lawsuit?	03:24:20
11	A. Do I have any objections? No.	03:24:27
12	Q. You graduated in 1966, correct?	03:24:44
13	A. No.	03:24:46
14	Q. Did you graduate from Texas Western?	03:24:47
15	A. Yes, I did.	03:24:49
16	Q. In what year?	03:24:50
17	A. 1969.	03:24:51
18	Q. So took some time following your	03:24:52
19	completion of your playing days to finish your	03:24:55
20	degree?	03:24:58
21	A. Yes.	03:24:58
22	Q. What did you get your degree in?	03:24:59
23	A. I was a Bachelor of arts degree.	03:25:01
24	Q. And what was your major?	03:25:04
25	A. Education.	03:25:06

1 A. Yes. 03:31:46

2 Q. You didn't start giving speeches for 03:31:47

3 money until after the Glory Road movie was 03:31:49

4 released, correct? 03:31:54

5 A. Correct. 03:31:55

6 Q. It wasn't until after the Glory Road 03:31:56

7 movie was released and there was wide 03:32:00

8 attention to the important work that you and 03:32:02

9 your teammates did and the significance of the 03:32:06

10 game, championship game in which you played 03:32:09

11 that garnered sufficient attention for people 03:32:11

12 to seek out your views and ask you to speak, 03:32:14

13 correct? 03:32:16

14 MR. CLOBES: Objection to form. 03:32:16

15 THE WITNESS: Correct. 03:32:20

16 BY MR. SLAUGHTER: 03:32:24

17 Q. You were on the cover of Sports 03:32:24

18 Illustrated after your championship game, 03:32:27

19 correct? 03:32:28

20 A. Yes. 03:32:29

21 Q. Did Sports Illustrated ask your 03:32:30

22 permission before they put you on the cover? 03:32:32

23 A. No. 03:32:34

24 Q. Were you paid any compensation for 03:32:35

25 appearing on the cover of Sports Illustrated? 03:32:38

1	A. No.	03:32:40
2	Q. Did you object to Sports Illustrated	03:32:41
3	in any way with respect to being on the cover?	03:32:44
4	A. No.	03:32:48
5	Q. Were you proud to be on the cover of	03:32:48
6	Sports Illustrated?	03:32:51
7	A. Yes.	03:32:52
8	Q. Do you think Sports Illustrated should	03:32:53
9	have paid you to put you on the cover?	03:32:57
10	A. Do I think?	03:33:00
11	Q. Yes, do you think that Sports	03:33:03
12	Illustrated should have paid you for putting	03:33:05
13	an image of you and Mr. Riley on the cover of	03:33:08
14	Sports Illustrated?	03:33:11
15	A. No.	03:33:12
16	Q. Why not?	03:33:13
17	A. Because we were college, still	03:33:13
18	participating in college at that time.	03:33:17
19	Q. Well, that was -- your championship	03:33:21
20	year was your senior year; is that right?	03:33:23
21	A. Yes.	03:33:25
22	Q. You had played your last game, that	03:33:26
23	was by definition your last collegiate game?	03:33:28
24	A. Yes.	03:33:31
25	Q. Correct?	03:33:31

1 interest than the former players; is that 03:55:47

2 right? 03:55:50

3 A. I don't know what you mean by that. 03:55:50

4 Q. Okay. Fair enough. The current 03:55:52

5 players, were they to receive compensation, 03:55:53

6 could risk losing their eligibility to play, 03:55:57

7 is that right, as you understand it? 03:56:00

8 A. Yes. 03:56:02

9 Q. Former players don't have that risk? 03:56:02

10 A. Correct. 03:56:04

11 Q. So the former players and the current 03:56:05

12 players are situated differently? 03:56:07

13 A. Correct. 03:56:10

14 Q. You seek to represent -- strike that. 03:56:25

15 What group -- strike that. 03:56:29

16 You seek to represent all former Division I 03:56:33

17 college football and basketball players, 03:56:38

18 correct? 03:56:41

19 A. Correct. 03:56:41

20 Q. And you believe -- should a team of 03:56:41

21 players receive compensation even if their 03:56:49

22 game, for instance, doesn't appear in one of 03:56:54

23 EA's games? 03:56:58

24 MR. CLOBES: Compensation from EA? 03:56:59

25 BY MR. SLAUGHTER: 03:57:08

1 appeared in the game; is that right? 03:58:04

2 MR. CLOBES: Objection, form. 03:58:05

3 THE WITNESS: I'm not sure about 03:58:09

4 that. 03:58:14

5 BY MR. SLAUGHTER: 03:58:14

6 Q. You're not sure about that why? 03:58:16

7 A. Because with TV cameras, they would 03:58:19

8 scan the bench. 03:58:24

9 Q. Okay. Fair enough. If a player never 03:58:24

10 was on the team -- so now I'm going to give 03:58:28

11 you a hypothetical question, okay. If a 03:58:31

12 player gets injured, plays the whole season on 03:58:35

13 the team, gets injured before the last game 03:58:37

14 and isn't able to make it to the game, so he's 03:58:41

15 not in the arena at the time of the game, but 03:58:44

16 that game is broadcast on television and after 03:58:46

17 the students graduate it's subsequently 03:58:49

18 rebroadcast, should that student athlete who 03:58:51

19 wasn't able to make it to the game, wasn't on 03:58:55

20 the broadcast, share in any compensation 03:58:59

21 afforded to the players who did appear in the 03:59:03

22 game? 03:59:06

23 MR. CLOBES: Objection, form. 03:59:06

24 THE WITNESS: Yes. 03:59:07

25 BY MR. SLAUGHTER: 03:59:07

1	Q.	Why?	03:59:08
2	A.	Because he's still a part of the team.	03:59:09
3	Q.	His name and image wasn't used in the	03:59:11
4		broadcast, though, right, but he should	03:59:14
5		nevertheless be compensated?	03:59:16
6	A.	Yes.	03:59:19
7	Q.	What is he being compensated for?	03:59:20
8	A.	He's a part of the team.	03:59:22
9	Q.	And he's being compensated for the	03:59:25
10		work that he put in along with his other	03:59:27
11		teammates during the course of the season that	03:59:30
12		he was a member of the team?	03:59:32
13	A.	Yes.	03:59:35
14		THE WITNESS: Can I stop for one	03:59:49
15		moment? My throat is dry.	03:59:50
16		MR. SLAUGHTER: Why don't we go	03:59:55
17		off the record and take a five minute break.	03:59:56
18		THE VIDEOGRAPHER: The time is	03:59:59
19		3:59 p.m. We're off the record.	04:00:09
20		(Brief recess).	04:00:11
21		THE VIDEOGRAPHER: The time is	04:09:53
22		4:09 p.m. We're back on the record.	04:09:55
23		BY MR. SLAUGHTER:	04:09:58
24	Q.	You believe, Mr. Flournoy, that you	04:09:59
25		and your teammates ought to have -- you know,	04:10:01

1 MR. CLOBES: Second page of the 04:33:58
2 autobiographical? 04:34:01

3 BY MR. SLAUGHTER: 04:34:01

4 Q. The second page of the 04:34:01
5 autobiographical sketch, the third page of the 04:34:03
6 exhibit, do you see the paragraph at the top 04:34:05
7 that starts "setting certain athletic goals"? 04:34:07

8 MR. CLOBES: It's the third 04:34:11
9 paragraph. 04:34:12

10 THE WITNESS: Yes. 04:34:12

11 BY MS. KEFALAS: 04:34:12

12 Q. There's a sentence in here I want to 04:34:14
13 read and then I'll ask you some questions 04:34:16
14 about it. 04:34:17

15 A. Okay. 04:34:18

16 Q. It's in that paragraph, it says, "I 04:34:18
17 discovered that my education coupled with my 04:34:21
18 athletics were developing more than your 04:34:23
19 intellect and basketball skills. I discovered 04:34:27
20 that this experience was going to develop my 04:34:29
21 character. Interacting with students of 04:34:31
22 different ethnic, racial and social 04:34:34
23 backgrounds helped me to be successful in 04:34:36
24 today's diverse social environment." Do you 04:34:37
25 see that? 04:34:40

1	your degree; is that correct?	04:35:45
2	A. Yes.	04:35:46
3	Q. And so you set a high value in getting	04:35:48
4	and finishing that education?	04:35:50
5	A. Yes.	04:35:51
6	Q. Did you think that the collegiate	04:35:53
7	career in which you both participated in	04:35:57
8	athletics and finished your education was a	04:36:00
9	good experience for you?	04:36:02
10	A. Yes.	04:36:03
11	Q. And that was because you took	04:36:09
12	advantage of the opportunities you were given	04:36:10
13	and worked hard at it?	04:36:11
14	A. Yes.	04:36:14
15	Q. Did you know of others either at the	04:36:15
16	time or since that were given the same	04:36:17
17	opportunities and perhaps didn't take	04:36:19
18	advantage of those opportunities?	04:36:22
19	A. Could you explain what you mean by	04:36:25
20	others?	04:36:27
21	Q. Well, other student athletes who	04:36:27
22	didn't appreciate the opportunities that were	04:36:30
23	given, didn't concentrate on their studies or	04:36:32
24	participate as hard as they could have on	04:36:36
25	their team?	04:36:38

1 MR. CLOBES: Objection, form. 04:36:39

2 THE WITNESS: You're talking about 04:36:41

3 Texas Western? 04:36:43

4 BY MS. KEFALAS: 04:36:43

5 Q. Texas Western or student athletes that 04:36:47

6 you may have encountered since you've left 04:36:48

7 school. 04:36:51

8 A. Yes. 04:36:53

9 Q. Do you think that has a negative 04:36:56

10 impact on their life when they don't take 04:36:57

11 advantage of the opportunities they receive? 04:37:00

12 MR. CLOBES: Objection, form. 04:37:02

13 THE WITNESS: Yes. 04:37:03

14 BY MS. KEFALAS: 04:37:03

15 Q. Did you get financial aid to finish 04:37:05

16 your degree when you were done with 04:37:07

17 basketball? 04:37:09

18 A. No. 04:37:10

19 Q. Mr. Slaughter asked you some questions 04:37:10

20 about whether or not NCAA rules preventing 04:37:19

21 current student athletes from receiving 04:37:21

22 various forms of compensation should be 04:37:23

23 changed. Do you remember those questions? 04:37:26

24 A. Yes. 04:37:27

25 Q. Do you think that schools should pay 04:37:30

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1 student athletes a salary for their 04:37:31
2 participation in intercollegiate athletics? 04:37:33

3 A. I'm not an expert on how that should 04:37:44
4 be done. I don't know that salary is a word 04:37:47
5 that I would use. 04:37:49

6 Q. Do you think that college sports would 04:37:49
7 be the better for becoming more 04:37:56
8 professionalized? 04:37:58

9 MR. CLOBES: Objection, form. 04:37:59

10 THE WITNESS: Could you repeat 04:38:03
11 that one more time from -- 04:38:15

12 MR. CLOBES: Do you want it 04:38:15
13 rephrased or do you want repeated? 04:38:17

14 THE WITNESS: No, she can repeat 04:38:17
15 it. I'm mulling it over in my head and I just 04:38:18
16 need to hear it again. I'm getting old now 04:38:22
17 and some things leave me quick. 04:38:25

18 MR. CLOBES: The court reporter 04:38:27
19 can reread it. 04:38:27

20 (The record was read.) 04:38:36

21 THE WITNESS: What do you mean by 04:38:46
22 professionalized? 04:38:47

23 BY MS. KEFALAS: 04:38:47

24 Q. I mean that there would be a labor 04:38:50
25 market for students athletes to participate on 04:38:51

1	the team and they would compete for salaries	04:38:54
2	like in the pros.	04:38:56
3	MR. CLOBES: Objection, form.	04:38:57
4	THE WITNESS: No.	04:39:01
5	BY MS. KEFALAS:	04:39:01
6	Q. Do you think that the NCAA bylaws and	04:39:03
7	member institutions should still require	04:39:07
8	student athletes to go to class?	04:39:10
9	A. Yes.	04:39:13
10	Q. Should there still be progress towards	04:39:14
11	degree requirements?	04:39:17
12	A. Yes.	04:39:18
13	Q. You understand that those rules	04:39:19
14	regarding progress towards degree requirements	04:39:22
15	have changed since you were in school?	04:39:24
16	MR. CLOBES: Objection to form.	04:39:28
17	THE WITNESS: No.	04:39:30
18	BY MS. KEFALAS:	04:39:30
19	Q. Did you understand what any of the	04:39:33
20	rules for your academic requirements were in	04:39:36
21	1965 and '66?	04:39:39
22	A. Yes.	04:39:42
23	Q. Were you required to go to class and	04:39:44
24	pass your classes?	04:39:47
25	A. Yes.	04:39:48

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C E R T I F I C A T E

G E O R G I A:
FULTON COUNTY:

I hereby certify that the foregoing deposition was reported, as stated in the caption, and the questions and answers thereto were reduced to the written page under my direction; that the foregoing pages represent a true and correct transcript of the evidence given. I further certify that I am not in any way financially interested in the result of said case.

Pursuant to Rules and Regulations of the Board of Court Reporting of the Judicial Council of Georgia, I make the following disclosure:

I am a Georgia Certified Court Reporter. I am here as an independent contractor for Huseby, Inc.

1 I was contacted by the offices of
2 Huseby, Inc. to provide court
3 reporting services for this deposition.
4 I will not be taking this deposition under
5 any contract that is prohibited by O.C.G.A.
6 15-14-7 (a) or (b).

7 I have no written contract to
8 provide reporting services with any party
9 to the case, any counsel in the case, or
10 any reporter or reporting agency from whom
11 a referral might have been made to cover
12 this deposition. I will charge my usual
13 and customary rates to all parties in the
14 case.

15 This, the 10th day of November, 2011.

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STEVE S. HUSEBY, CCR-B-1372
My Commission Expires
January 20th, 2015.