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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
BROWARD DIVISION

CASE No: 04-61422-Civ-Cohn/Snow

MIAMI DOLPHINS, LTD. and)
NATIONAL FOOTBALL LEAGUE)
MANAGEMENT COUNCIL,)
)
Petitioners,)
)
vs.)
)
ERRICK L. "RICKY" WILLIAMS and)
NATIONAL FOOTBALL LEAGUE)
PLAYERS ASSOCIATION,)
)
Respondents.)
)

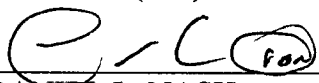
NOTICE OF FILING PROPOSED FINAL JUDGMENT


In accordance with the Court's direction in the Order Granting Motion to Confirm Award [and] Order Denying Motion to Vacate Award [D.E. 30], petitioners Miami Dolphins, Ltd., and National Football League Management Council hereby provide notice of filing a proposed Final Judgment, a copy of which is attached.

Respectfully submitted,

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*Counsel for National Football League
Management Council*

Counsel for Miami Dolphins, Ltd.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that true and correct copies of the *Notice of Filing Proposed Final Judgment* were served by U.S. mail this 22nd day of February, 2005, on:

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ERRICK L. "RICKY" WILLIAMS and)
NATIONAL FOOTBALL LEAGUE)
PLAYERS ASSOCIATION,)
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[PROPOSED] FINAL JUDGMENT

This cause is before the Court pursuant to its Order Granting Motion to Confirm Award [and] Order Denying Motion to Vacate Award ("Order") [D.E. 30] dated February 15, 2005, and upon Petitioners' Miami Dolphins, Ltd. ("Dolphins"), and National Football League Management Council Petition to Confirm Arbitration Award ("Petition") [D.E. 1], which seeks confirmation of an arbitration award against respondents Errick L. "Ricky" Williams and the National Football League Players Association.

After consideration of the Petition, the Motion for Confirmation of Arbitration Award [D.E. 15], the Cross-Motion to Vacate Arbitration Award [D.E. 14], the parties' briefs, and oral argument on the motions, the Court entered the Order.

Accordingly, it is hereby **ORDERED AND ADJUDGED** as follows:

1. For the reasons stated in the Order, the arbitration award dated September 24, 2004 [D.E. 1, Ex. B], entered by arbitrator Richard Bloch and the arbitrator's Opinion dated

October 5, 2004 [D.E. 1, Ex. C], be and the same is hereby **ADOPTED, RATIFIED and CONFIRMED.**

2. Petitioner Miami Dolphins, Ltd., is entitled to entry of judgment against Errick L. "Ricky" Williams, Social Security No. 573-59-0469, whose last known address is 2308 Castilla Isle, Ft. Lauderdale, Florida 33301, in the sum of \$8,616,353.00 that shall bear interest at the statutory rate pursuant to 28 U.S.C. § 1961 from the date hereof until paid, for which sum let execution issue.

DONE and ORDERED in Chambers at Broward County, Florida, this ____ day of February, 2005.

JAMES I. COHN
United States District Judge

copies to:

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Daniel Nash, Esq.
Edward Soto, Esq./Christopher Page, Esq.
Jeffrey Kessler, Esq./Melanie Moss, Esq.