

**Attachment 1 – Plaintiffs’ Proposed Order
that they emailed to Chambers on April 26, 2011**

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

TOM BRADY, DREW BREES,
VINCENT JACKSON, BEN LEBER,
LOGAN MANKINS, PEYTON MANNING,
VON MILLER, BRIAN ROBISON,
OSI UMENYIORA, and MIKE VRABEL,
individually, and on behalf of all others
similarly situated,

Plaintiffs,

v.

No. 0:11-cv-00639-SRN-JJG

NATIONAL FOOTBALL LEAGUE, et al.,

Defendants.

[PROPOSED] ORDER ON PRELIMINARY INJUNCTION

For the reasons explained in this Court’s memorandum opinion dated April 25, 2011, the Court has granted the plaintiffs’ motion for a preliminary injunction. **IT IS THEREFORE ORDERED** that Defendants National Football League, Arizona Cardinals, Inc., Atlanta Falcons Football Club LLC, Baltimore Ravens Limited Partnership, Buffalo Bills, Inc., Panthers Football LLC, Chicago Bears Football Club, Inc., Cincinnati Bengals, Inc., Cleveland Browns LLC, Dallas Cowboys Football Club, Ltd., Denver Broncos Football Club, Detroit Lions, Inc., Green Bay Packers, Inc., Houston NFL Holdings LP, Indianapolis Colts, Inc., Jacksonville Jaguars Ltd., Kansas City Chiefs Football Club, Inc., Miami Dolphins, Ltd., Minnesota Vikings Football Club LLC, New England Patriots, LP, New Orleans Louisiana Saints, LLC, New York Football Giants, Inc., New York Jets Football Club, Inc., Oakland Raiders LP, Philadelphia Eagles LP, Pittsburgh Steelers Sports, Inc., San Diego Chargers Football Co., San Francisco Forty Niners

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Ltd., Football Northwest LLC, The Rams Football Co. LLC, Buccaneers Limited Partnership, Tennessee Football, Inc., and Washington Football Inc., as well as their officers, employees, and agents and any persons or entities acting under their direction and control, are restrained and enjoined, for one year from the effective date of this preliminary injunction or until further order from this Court, from:

1. engaging in any contract, combination, conspiracy, boycott, concerted conduct, or collective agreement not to comply with the terms of the contracts of the professional football players of the National Football League;

2. engaging in any contract, combination, conspiracy, boycott, concerted conduct, or collective agreement not to negotiate, compete for, or sign contracts with all of the current and prospective NFL players who do not have player contracts; and

3. engaging in any contract, combination, conspiracy, boycott, concerted conduct, or collective agreement to prevent NFL teams from participating with players in activities to prepare for the 2011 NFL season.

IT IS SO ORDERED on this the _____ day of _____, 2011.

The Honorable Susan Richard Nelson
United States District Judge