

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

Carl Eller, Franco Harris, Marcus Allen,
Paul Krause, Lemuel Barney, Joseph
DeLamielleure, Elvin Bethea, Michael
Haynes, Obafemi Ayanbadejo, and Ryan
Collins, individually, and on behalf of all
others similarly situated,

Civil Action No: 11-cv-00639
SRN/JJG

Plaintiffs,

v.

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 Football Club, Inc., Pittsburgh
Steelers Sports, Inc., San Diego Chargers
Football Co., San Francisco Forty Niners
Ltd., Football Northwest LLC, The Rams
Football Co. LLC, Buccaneers Limited
Partnership, Tennessee Football, Inc.,
Washington Football Inc. and National
Football League Players Association, Tom
Brady, Drew Brees, Vincent Jackson, Ben
Leber, Logan Mankins, Peyton Manning,
Von Miller, Brian Robison, Osi

MOTION FOR LEAVE TO FILE
SECOND AMENDED
COMPLAINT AND
CROSSCLAIM

Umenyiora, Mike Vrabel and DeMaurice Smith.

Defendants.

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Pursuant to Fed.R.Civ.P. 15(a) and Fed.R.Civ.P. 13, Plaintiffs Carl Eller, Obafemi Ayanbadejo, and Ryan Collins (the “*Eller* Plaintiffs”) hereby request leave of the Court to file and serve Plaintiffs’ Second Amended Complaint (“SAC”) and add crossclaims at a date and time to be determined by the Court.

This Motion is based upon all of the files and records herein, as well as the Memorandum of Law filed in Support of the Motion.

Dated: July 4, 2011

Respectfully Submitted,

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