

**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

**NOTICE OF HEARING ON**  
**MOTION FOR LEAVE TO FILE**  
**SECOND AMENDED**  
**COMPLAINT AND**  
**CROSSCLAIM**

Umenyiora, Mike Vrabel and DeMaurice Smith.

Defendants.

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TO: All Counsel of Record:

PLEASE TAKE NOTICE that Plaintiffs Carl Eller, Obafemi Ayanbadejo, and Ryan Collins (the “*Eller* Plaintiffs”) will bring the accompanying Motion requesting leave of the Court to file and serve Plaintiffs’ Second Amended Complaint (“SAC”) pursuant to Fed.R.Civ.P. 15(a), and crossclaim pursuant to Fed.R.Civ.P. 13 before the Honorable Susan Richard Nelson at a date and time to be determined by the Court at the United States District Court, 774 Federal Building, 316 North Robert Street, St. Paul, MN, 55106, for an Order granting Plaintiffs leave to file a Second Amended Complaint.

Dated: July 4, 2011

Respectfully Submitted,

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