

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

TOM BRADY, *et al.*,

Civ. No. 0:11-CV-00639-SRN-JJG

Plaintiffs,

v.

NATIONAL FOOTBALL LEAGUE
et al.,

Defendants.

**JOINT MOTION TO
RESCHEDULE THE
HEARING AND EXTEND THE
BRIEFING SCHEDULE ON
THE ELLER PLAINTIFFS'
MOTION TO AMEND**

Plaintiffs Carl Eller, Obafemi Ayanbadejo, and Ryan Collins (the “*Eller* Plaintiffs”) and the NFL Defendants hereby jointly move to postpone by thirty days the hearing date and briefing schedule for the *Eller* Plaintiffs’ motion requesting leave of Court to file and serve a Second Amended Complaint. (Dkt. No. 142) The parties make this joint request to allow the NFL Defendants to focus on the continuing mediation ordered by the Court (Dkt. No. 56).

At the Court’s direction, the parties have been meeting from time to time since April 11, 2011, in an effort to resolve their disputes.

On July 4, 2011, the *Eller* Plaintiffs filed their motion requesting leave to file and serve a Second Amended Complaint. On July 5, 2011, the Court set a briefing schedule that requires the NFL Defendants to file their

response to the motion on or before July 18, 2011. (Doc. No. 150.)

Both the *Eller* Plaintiffs and the NFL Defendants agree that postponing the current hearing date and corresponding briefing schedule will aid the continuing court-ordered discussions. The parties therefore respectfully request the Court to vacate its current order setting a briefing schedule and set a new hearing date on or after September 8, 2011. Once the Court has established a new hearing date, the *Eller* Plaintiffs will file an Amended Notice for Hearing.

Respectfully submitted,

David Boies (*pro hac vice*)
BOIES, SCHILLER & FLEXNER LLP
333 Main Street
Armonk, NY 10504
(914) 749-8200
(914) 749-8300 (fax)

William A. Isaacson (*pro hac vice*)
BOIES, SCHILLER & FLEXNER LLP
5301 Wisconsin Ave., NW
Washington, DC 20015
(202) 237-2727
(202) 237-6131 (fax)

s/Daniel J. Connolly
Daniel J. Connolly #197247
Aaron D. Van Oort #315539
FAEGRE & BENSON LLP
2200 Wells Fargo Center
90 South Seventh Street
Minneapolis, MN 55402-3901
(612) 766-7806
(612) 766-1600 (fax)

Gregg H. Levy (*pro hac vice*)
Benjamin C. Block (*pro hac vice*)
COVINGTON & BURLING LLP
1201 Pennsylvania Ave., NW
Washington, DC 20004-2401
(202) 662-6000
(202) 662-6291 (fax)

Counsel for the NFL and NFL Clubs

July 18, 2011