

11CV639  
RHK/JTB

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

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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.

NATIONAL FOOTBALL LEAGUE, et al.,

Defendants.

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Court File No: \_\_\_\_\_

NOTICE OF MOTION FOR  
PRELIMINARY INJUNCTION

[Oral Argument Requested]

**TO: NATIONAL FOOTBALL LEAGUE**

**PLEASE TAKE NOTICE** that on \_\_\_\_\_, as

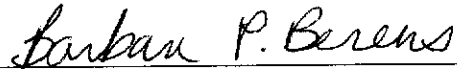
soon as counsel may be heard, at the United States Courthouse, United States District Court, 300 South 4<sup>th</sup> Street, Minneapolis, Minnesota, Plaintiffs will bring a motion for preliminary injunction under Federal Rule of Civil Procedure 65 before a Judge of the United States District Court for the District of Minnesota.

Plaintiffs will move the Court to enjoin Defendants National Football League ("NFL") and the 32 separately owned and operated NFL teams, and their officers, agents, servants, employees and attorneys, and all other persons acting in concert with any of them, from engaging in a group boycott and price-fixing agreement (which the NFL and its member teams characterize as a player

“lockout”), which violates Section 1 of the Sherman Act, 15 U.S.C. § 1, by completely eliminating all competition for the services of NFL players with no pro-competitive objective, until further order of this Court.

Dated: March 11, 2011

Respectfully Submitted,



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