

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

Carl Eller, Priest Holmes, Obafemi
Ayanbadejo, and Ryan Collins,
individually, and on behalf of all others
similarly situated,

Plaintiffs,

Civil Action No: 0:11-cv-00748-RHK-JSM

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.

Defendants.

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**PLAINTIFFS' MOTION
FOR A PRELIMINARY
INJUNCTION**

[Oral Argument Requested]

Pursuant to Rule 65 of the Federal Rules of Civil Procedure, Plaintiffs Carl Eller, Priest Holmes, Obafemi Ayanbadejo, and Ryan Collins hereby move this Court for a preliminary injunction restraining the National Football League (“NFL” or “league”) and its 32 separately owned and operated member clubs from continuing a group boycott and price-fixing agreement, i.e., “lockout,” which violates Section 1 of the Sherman Act, 15 U.S.C. § 1, and threatens to cancel the 2011 NFL playing season and cause irreparable injury to the retired and rookie members of the putative class sought to be represented by Plaintiffs here, as well as active NFL players.

This Motion is based upon all of the files, records and proceedings in this action, the arguments of counsel, and the accompanying Memorandum and authorities cited therein.

Dated: March 30, 2011

Respectfully Submitted,

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