

**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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**MEMORANDUM IN SUPPORT
OF PLAINTIFFS' MOTION TO
EXPEDITE BRIEFING
SCHEDULE AND HEARING**

Plaintiffs Carl Eller, Priest Holmes, Obafemi Ayanbadejo, and Ryan Collins (“Plaintiffs”) respectfully submit this memorandum in support of their Motion to Expedite the Briefing Schedule and Hearing of their Motions for Preliminary Injunction and Motion to Consolidate. This Court should expedite the briefing schedule and hearing on Plaintiffs’ Motions so that Plaintiffs’ Motions may be heard at the same time as the Motion for Temporary Injunction in the related case of *Brady v. NFL*, No. 0:11-cv-00639-SRN-JJG (D. Minn.) (“*Brady*”), due to be heard on April 6, 2011. “Order” (March 14, 2011) (*Brady* Dkt. No. 33).

The *Eller* and *Brady* actions arise from the same body of facts and involve the same defendants - National Football League (“NFL” or “league”), and its member teams. The Motions should be heard at the same time to promote efficiency and judicial economy and to avoid the potential for inconsistent results.

For the foregoing reasons, Plaintiffs respectfully request that the Court grant their Motion to Expedite the Briefing Schedule and the Hearing on their Motion for a Preliminary Injunction and Motion to Consolidate so that Plaintiffs’ Motions may be heard at the April 6, 2011 hearing of the related case of *Brady v. NFL*, No. 0:11-cv-00639-SRN-JJG (D. Minn.).

Dated: March 30, 2011

Respectfully Submitted,

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