

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

-----X	:	
REGGIE WHITE, et al.,	:	No. 4:92-cv-00906 (DSD-SPMS)
	:	
Plaintiffs,	:	Judge Doty
	:	
v.	:	
	:	
NATIONAL FOOTBALL LEAGUE, et al.,	:	
	:	
Defendants.	:	
-----X	:	

**DECLARATION OF DAVID BARRETT IN SUPPORT OF MOTION TO
UNSEAL RECORD**

The undersigned, David A. Barrett, hereby declares as follows:

1. I am one of the attorneys representing the NFLPA, am over the age of 18 years, and except as otherwise indicated have personal knowledge of the matters set forth herein. Where statements are made upon information and belief, they accurately recite information given to me by others that I believe to be true.

2. Attached as Exhibit 1 hereto is a true and correct copy of a letter from Paul R. Hannah to Mark Jacobson, *et al.*, (re: “Unsealing of Exhibits and Testimony in *White v. NFL, et al.*”) dated March 4, 2011.

3. Attached as Exhibit 2 hereto is a true and correct copy of a letter from Benjamin C. Block to Paul R. Hannah (re: “Unsealing of Exhibits and Testimony in *White v. NFL*”) dated March 4, 2011.

4. Attached as Exhibit 3 hereto is a true and correct copy of excerpts of an email

from David A. Barrett to Benjamin Block (re: “redactions”) dated March 1, 2011.

I declare under penalty of perjury under 28 U.S.C. § 1746 that the foregoing is true and correct.

Executed on March 9, 2011

s/ David A. Barrett
David A. Barrett