JS 44C/SDNY REV. 10/01/2020

## **CIVIL COVER SHEET**

The JS-44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for use of the Clerk of Court for the purpose of initiating the civil docket sheet.

H	'L/	ΑII	VΙ	ΙH	H	S

BRIAN FLORES, as a Class Representative, on behalf of himself and all others similarly situated

**DEFENDANTS** THE NATIONAL FOOTBALL LEAGUE; NEW YORK FOOTBALL GIANTS,

INC.; MIAMI DOLPHINS, LTD.; DENVER BRONCOS; and JOHN DOE TEAMS 1 through 29

ATTORNEYS (FIRM NAME, ADDRESS, AND TELEPHONE NUMBER uglas H. Wigdor, Esq. Wigdor LLP John Elefterakis, Esq. Douglas H. Wigdor, Esq.

Elefterakis, Elefterakis & Panek

No x

ATTORNEYS (IF KNOWN)

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(212) 257-6800 212) 532-1116
CAUSE OF ACTION (CITE THE U.S. CIVIL STATUTE UNDER WHICH YOU ARE FILING AND WRITE A BRIEF STATEMENT OF CAUSE) (DO NOT CITE JURISDICTIONAL STATUTES UNLESS DIVERSITY)

Has this action, case, or proceeding, or one essentially the same been previously filed in SDNY at any time? No ☑Yes ☐	Judge Previously Assigned
If yes, was this case Vol. Invol. Dismissed. No Yes If yes, give date & Case	No.

IS THIS AN INTERNATIONAL ARBITRATION CASE? (PLACE AN [x] IN ONE BOX ONLY)

NATURE OF SUIT

Yes

TORTS

42 U.S.C. §1981, claims of racial discrimination

**ACTIONS UNDER STATUTES** 

		IORIS			ACTIONS UNDER STATUTES	
CONTRACT	-	PERSONAL INJURY	PERSONAL INJURY	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
[]110 []120 []130 []140	INSURANCE MARINE MILLER ACT NEGOTIABLE INSTRUMENT	[]310 AIRPLANE []315 AIRPLANE PRODUCT LIABILITY []320 ASSAULT, LIBEL & SLANDER	PHARMACEUTICAL PERSONAL INJURY/PRODUCT LIABILITY [] 365 PERSONAL INJURY PRODUCT LIABILITY [] 368 ASBESTOS PERSONAL	[ ] 625 DRUG RELATED SEIZURE OF PROPERTY 21 USC 881 [ ] 690 OTHER	[ ] 422 APPEAL 28 USC 158 [ ] 423 WITHDRAWAL 28 USC 157	[ ] 375 FALSE CLAIMS [ ] 376 QUI TAM [ ] 400 STATE REAPPORTIONMENT [ ] 410 ANTITRUST
[]150	RECOVERY OF OVERPAYMENT & ENFORCEMENT OF JUDGMENT MEDICARE ACT	[ ] 330 FEDERAL EMPLOYERS' LIABILITY [ ] 340 MARINE [ ] 345 MARINE PRODUCT	INJURY PRODUCT LIABILITY  PERSONAL PROPERTY	PROPERTY RIGHTS []820 COPYRIGHTS []880 []830 PATENT	DEFEND TRADE SECRETS ACT	[ ] 430 BANKS & BANKING [ ] 450 COMMERCE [ ] 460 DEPORTATION [ ] 470 RACKETEER INFLU- ENCED & CORRUPT
[] 152	RECOVERY OF DEFAULTED STUDENT LOANS (EXCL VETERANS) RECOVERY OF	LIABILITY [ ] 350 MOTOR VEHICLE [ ] 355 MOTOR VEHICLE PRODUCT LIABILITY [ ] 360 OTHER PERSONAL	[ ] 370 OTHER FRAUD [ ] 371 TRUTH IN LENDING	[ ] 835 PATENT-ABBREVIATED [ ] 840 TRADEMARK	NEW DRUG APPLICATION  SOCIAL SECURITY	ORGANIZATION ACT (RICO) [ ] 480 CONSUMER CREDIT [ ] 485 TELEPHONIC CONSUMER
[]160	OVERPAYMENT OF VETERAN'S BENEFITS STOCKHOLDERS SUITS	INJURY [ ] 362 PERSONAL INJURY - MED MALPRACTICE	[ ] 380 OTHER PERSONAL PROPERTY DAMAGE [ ] 385 PROPERTY DAMAGE PRODUCT LIABILITY	LABOR  [ ] 710 FAIR LABOR STANDARDS ACT [ ] 720 LABOR/MGMT	[ ] 861 HIA (1395ff) [ ] 862 BLACK LUNG (923) [ ] 863 DIWC/DIWW (405(g)) [ ] 864 SSID TITLE XVI [ ] 865 RSI (405(g))	PROTECTION ACT  []490 CABLE/SATELLITE TV []850 SECURITIES/ COMMODITIES/
[] 190 [] 195	OTHER CONTRACT CONTRACT PRODUCT	ACTIONS UNDER STATUTES	PRISONER PETITIONS [ ] 463 ALIEN DETAINEE [ ] 510 MOTIONS TO VACATE SENTENCE	RELATIONS [ ] 740 RAILWAY LABOR ACT [ ] 751 FAMILY MEDICAL LEAVE ACT (FMLA)	FEDERAL TAX SUITS	EXCHANGE [ ] 890 OTHER STATUTORY ACTIONS
[]196 FRA	LIABILITY NCHISE	CIVIL RIGHTS  [ 1440 OTHER CIVIL RIGHTS	28 USC 2255 [ ] 530 HABEAS CORPUS [ ] 535 DEATH PENALTY [ ] 540 MANDAMUS & OTHER	[ ]790 OTHER LABOR LITIGATION [ ]791 EMPL RET INC	[ ] 870 TAXES (U.S. Plaintiff or Defendant) [ ] 871 IRS-THIRD PARTY 26 USC 7609	[ ] 891 AGRICULTURAL ACTS [ ] 893 ENVIRONMENTAL MATTERS [ ] 895 FREEDOM OF
REAL PROF	PERTY	(Non-Prisoner)		SECURITY ACT (ERISA	A)	INFORMATION ACT [ ] 896 ARBITRATION
[]210	LAND CONDEMNATION	[x] 442 EMPLOYMENT [ ] 443 HOUSING/	PRISONER CIVIL RIGHTS	[ ] 462 NATURALIZATION		[ ] 899 ADMINISTRATIVE PROCEDURE ACT/REVIEW OR APPEAL OF AGENCY DECISION
[]220 []230	FORECLOSURE RENT LEASE & EJECTMENT TORTS TO LAND	ACCOMMODATIONS [ ] 445 AMERICANS WITH DISABILITIES - EMPLOYMENT	[ ] 550 CIVIL RIGHTS [ ] 555 PRISON CONDITION [ ] 560 CIVIL DETAINEE CONDITIONS OF CONFINEM	APPLICATION [ ] 465 OTHER IMMIGRATION		[ ] 950 CONSTITUTIONALITY OF STATE STATUTES
[]245	TORT PRODUCT	[ ] 446 AMERICANS WITH		_IVI		

Check if demanded in complaint:

LIABILITY ALL OTHER

REAL PROPERTY

[ ] 290

DISABILITIES -OTHER

[ ] 448 EDUCATION

CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23

DO YOU CLAIM THIS CASE IS RELATED TO A CIVIL CASE NOW PENDING IN S.D.N.Y. AS DEFINED BY LOCAL RULE FOR DIVISION OF BUSINESS 13?

IF SO, STATE:

DEMAND \$ OTHER JUDGE DOCKET NUMBER

Check YES only if demanded in complaint JURY DEMAND: YES □NO

NOTE: You must also submit at the time of filing the Statement of Relatedness form (Form IH-32).

(PLACE AN x IN O	NE BOX ONLY)		ORIGIN			
X 1 Original Proceeding	2 Removed from State Court		Reinstated or Reopened	5 Transferred from (Specify District)	☐ 6 Multidistrict ☐ 7 Litigation (Transferred)	Appeal to District Judge from Magistrate Judg
	a. all parties represe	ented Court			8 Multidistrict Litigation (Di	rect File)
	b. At least one party is pro se.	1			O Multidistrict Ettigation (Di	ect i liej
(PLACE AN x IN O				<b>TION</b> ]4 diversity	IF DIVERSITY CITIZENSHIP	•
	CITIZENSH	IIP OF PRINCIPAL PA	ARTIES (FOR	DIVERSITY CA	SES ONLY)	
(Place an [X]	in one box for Plaintiff and	d one box for Defendant)				
CITIZEN OF THIS STA	PTF DEF TE []1 []1	CITIZEN OR SUBJECT OF A FOREIGN COUNTRY	PTF [ ] 3	[ ] 3 INCORPO	RATED and PRINCIPAL PLACE ESS IN ANOTHER STATE	PTF DEF
CITIZEN OF ANOTHER	RSTATE []2 []2	INCORPORATED or PRINCIP OF BUSINESS IN THIS STA		[]4 FOREIGN	NATION	[]6 []6
PLAINTIFF(S) AD	DRESS(ES) AND COU	NTY(IES)				
DEFENDANT(S) A	ADDRESS(ES) AND CO ADDRESS UNKNOWN I IS HEREBY MADE THAT IDDRESSES OF THE FOL	<sup>-</sup> , AT THIS TIME, I HAVE B	EEN UNABLE, W	VITH REASONABLE	DILIGENCE, TO ASCERTA	N
I hereby certify tha	at this case should be as			pursuant to Local	Rule for Division of Busine	ss 18, 20 or 2
Check one: THIS	S ACTION SHOULD	BE ASSIGNED TO:	☐ WHITE	E PLAINS	<b>X</b> MANHATTAN	
DATE 2/1/2022  RECEIPT#	SIGNATURE OF	FATTORNEY OF RECORD		[ ] NO	RACTICE IN THIS DISTRIC ADMITTED Mo.09 Yr Ie # DW-9737	
Magistrate Judg	e is to be designated	by the Clerk of the Co		•	-	
	•				_ is so Designated.	
		Deputy				

UNITED STATES DISTRICT COURT (NEW YORK SOUTHERN)