

# Exhibit

# A



- 1 his wife; LYVONIA A. MITCHELL; KIRK )
- 2 CAMERON JONES; JAMES E. ROBBINS )
- 3 and SHANEETA ROBBINS, his wife; )
- 4 ROBERT J. FREDRICKSON and )
- 5 BARBARA FREDRICKSON, his wife; )
- 6 CHARLES E. MILLER; EDWARD P. LEE )
- 7 and SUSAN LEE, his wife; PATRICK )
- 8 HEENAN and SHARRON HEENAN, his )
- 9 wife; TOBY L. WRIGHT; KELLY )
- 10 KIRCHBAUM; )
- 11 JAMES HOOD and BONITA HOOD, his )
- 12 wife; RICHARD MERCIER and YADIRA )
- 13 MERCIER, his wife; )
- 14 BRETT ROMBERG and EMILY )
- 15 ROMBERG, his wife; STEVE KORTE and )
- 16 KARELIS KORTE, his wife; JOE HARRIS )
- 17 and LYDIA HARRIS, his wife; RODNEY )
- 18 HAMPTON and ANDETRIA HAMPTON, )
- 19 his wife; LEWIS D. TILLMAN and )
- 20 KATHY TILLMAN, his wife; LARRY )
- 21 KAMINSKI and LINDA KAMINSKI, his )
- 22 wife; DAVID KOCOUREK and MARY )
- 23 LEE KOCOUREK, his wife; ROBERT )
- 24 WEATHERS and DENISE WEATHERS, )
- 25 his wife; WAYNE HAWKINS and )
- 26 SHARON HAWKINS, his wife; )
- 27 ANTHONY HARGAIN; EDWARD )
- 28 PAYTON and RICA PAYTON, his wife; )
- 29 WILLIAM H. MANDLEY and TERESA )
- 30 MANDLEY, his wife; SHANTE CARVER; )
- 31 GEORGE GOEDDEKE and GENEVA )
- 32 GOEDDEKE, his wife; JAMES MICHAEL )
- 33 SCHNITKER and BEVERLEE )
- 34 SCHNITKER, his wife; CHRISTOPHER )
- 35 CALLOWAY; )
- 36 THOMAS C. RANDOLPH, II and )
- 37 EVELYN RANDOLPH, his wife; GARY )
- 38 JONES and TINA JONES, his wife; OTTIS )
- 39 ANDERSON and WANDA ANDERSON, )
- 40 his wife; LEONARD RUSSELL and )
- 41 TASHA RUSSELL, his wife; RORY )
- 42 GRAVES; DAVID M. WHITE and )
- 43 MONICA WHITE, his wife; PHILIP )
- 44 SMITH and GAIL SMITH; W. VERNON )
- 45 DEAN; ANTHONY COVINGTON; )
- 46 ANTHONY JONES and VALERIE )

TT/ST/2B

COMPLAINT FOR DAMAGES

1 JONES, his wife; STEVE REESE and )  
2 MARILYN REESE, his wife; DONALD )  
3 BESSILLIEU; HAROLD L. JACKSON )  
4 and CAROLYN JACKSON, his wife; )  
5 TODD JOHNSON and SHANNON )  
6 JOHNSON, his wife; CHRIS GOODE; )  
7 BRICE WALKER and VANISHA )  
8 WALKER, his wife; DERRICK S. )  
9 REYNOLDS; DAVID LEWIS and )  
10 BONNIE LEWIS, his wife; RONNIE )  
11 LIPPETT and SHERYL LIPPETT; his )  
12 wife; ROLAND JAMES and CARMEL )  
13 JAMES, his wife; MARK S. DUPER; )  
14 BRIAN INGRAM and SARCA INGRAM, )  
15 his wife; ANTHONY COLLINS and )  
16 TRUDY COLLINS, his wife; STEVE )  
17 NELSON and ANGELA NELSON, his )  
18 wife; JAMES E. WILLIS and SHALANE )  
19 WILLIS, his wife; ANTHONY HANCOCK )  
20 and PAULA HANCOCK, his wife; JEFF )  
21 BURRIS; WILLIAM C. BRADLEY and )  
22 SUSAN BRADLEY, his wife; KERRY )  
23 GOODE and TANJA GOODE, his wife; )  
24 RAYMOND CLAYBORN and )  
25 KIMBERLEY CLAYBORN, his wife; )  
26 STEVEN ZABEL and SUSAN ZABEL, his )  
27 wife; )

17 Plaintiffs,

19 vs.

20 NATIONAL FOOTBALL LEAGUE; NFL )  
21 PROPERTIES LLC; RIDDELL, INC. d/b/a )  
22 RIDDELL SPORTS GROUP, INC., ALL )  
23 AMERICAN SPORTS CORPORATION, )  
24 d/b/a RIDDELL/ALL AMERICAN; )  
25 RIDDELL SPORTS GROUP, INC, )  
26 EASTON-BELL SPORTS, INC.; )  
27 EASTON-BELL SPORTS, LLC; EB )  
28 SPORTS CORP.; and RBG HOLDINGS )  
CORP.; and JOHN DOES 1 through 100, )  
Inclusive, )

27 Defendants.

11/25/28

1 The Plaintiffs, all individuals, hereby complains of Defendants listed above and hereby alleges  
2 as follows:

3 PARTIES

4 Plaintiffs:

- 5 1. Mr. Vernon Maxwell is a resident of and domiciled in the State of Arizona.  
6 2. Mr. Broderick Jones is a resident of and domiciled in the State of Alabama.  
7 3. Mr. Kendall Williams and his wife, Ingrid, are residents of and domiciled in the State  
8 of Nevada.  
9 4. Mr. Mike C. Richardson is a resident of and domiciled in the State of California.  
10 5. Mr. Renard Young and his wife, Vanessa, are residents of and domiciled in the State  
11 of California.  
12 6. Mr. LonZell Hill and his wife, Lanita, are residents of and domiciled in the State of  
13 Ohio.  
14 7. Mr. George Visger and his wife, Kritsie, are residents of and domiciled in the State of  
15 California.  
16 8. Mr. Terry Wright is a resident of and domiciled in the State of Arizona.  
17 9. Mr. Newton Williams is a resident of and domiciled in the State of North Carolina.  
18 10. Mr. Duane Galloway is a resident of and domiciled in the State of California.  
19 11. Mr. George Jamison and his wife, Arnella, are residents of and domiciled in the State  
20 of Michigan.  
21 12. Mr. Bryan Hooks is a resident of and domiciled in the State of Arizona.  
22 13. Mr. Fred McNeill and his wife, Tia, are residents of and domiciled in the State of  
23 California.  
24 14. Mr. Reginald Rogers, Sr. is a resident of and domiciled in the State of Washington.  
25 15. Mr. Melvin Jenkins and his wife, Javoni, are residents of and domiciled in the State  
26 of Arizona.

- 1 16. Mr. Antonio Gibson and his wife, Betty, are residents of and domiciled in the State of
- 2 Texas.
- 3 17. Mr. Alvin Moore and his wife, Odetta, are residents of and domiciled in the State of
- 4 Arizona.
- 5 18. Mr. Lyvonia A. Mitchell is a resident of and domiciled in the State of Louisiana.
- 6 19. Mr. Kirk Cameron Jones is a resident of and domiciled in the State of Florida.
- 7 20. Mr. James E. Robbins and his wife, Shaneeta, are residents of and domiciled in the
- 8 State of Arizona.
- 9 21. Mr. Robert J. Fredrickson and his wife, Barbara, are residents of and domiciled in the
- 10 State of Arizona.
- 11 22. Mr. Charles E. Miller is a resident of and domiciled in the State of California.
- 12 23. Mr. Edward P. Lee and his wife, Susan, are residents of and domiciled in the State of
- 13 Maryland.
- 14 24. Mr. Patrick Heenan and his wife, Sharron, are residents of and domiciled in the State
- 15 of Tennessee.
- 16 25. Mr. Toby L. Wright is a resident of and domiciled in the State of Arizona.
- 17 26. Mr. Kelly Kirchbaum is a resident of and domiciled in the State of Kentucky.
- 18 27. Mr. James Hood and his wife, Bonita, are residents of and domiciled in the State of
- 19 California.
- 20 28. Mr. Richard Mercier and his wife, Yadira, are residents of and domiciled in the State
- 21 of Florida.
- 22 29. Mr. Brett Romberg and his wife, Emily, are residents of and domiciled in the State of
- 23 Florida.
- 24 30. Mr. Steve Korte and his wife, Karelis, are residents of and domiciled in the State of
- 25 Louisiana.
- 26 31. Mr. Joe Harris and his wife, Lydia, are residents of and domiciled in the State of
- 27 Georgia.
- 28

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- 1           32. Mr. Rodney Hampton and his wife, Andetria, are residents of and domiciled in the
- 2 State of Texas.
- 3           33. Mr. Lewis D. Tillman and his wife, Kathy, are residents of and domiciled in the State
- 4 of Mississippi.
- 5           34. Mr. Larry Kaminski and his wife, Linda, are residents of and domiciled in the State
- 6 of Washington.
- 7           35. Mr. David Kocourek and his wife, Mary Lee, are residents of and domiciled in the
- 8 State of Florida.
- 9           36. Mr. Robert Weathers and his wife, Denise, are residents of and domiciled in the State
- 10 of Florida.
- 11           37. Mr. Wayne Hawkins and his wife, Sharon, are residents of and domiciled in the State
- 12 of California.
- 13           38. Mr. Anthony Hargain is a resident of and domiciled in the State of California.
- 14           39. Mr. Edward Payton and his wife, Rica, are residents of and domiciled in the State of
- 15 Mississippi.
- 16           40. Mr. William H. Mandley and his wife, Teresa, are residents of and domiciled in the
- 17 State of Arizona.
- 18           41. Mr. Shante Carver is a resident of and domiciled in the State of Arizona.
- 19           42. Mr. George Goeddeke and his wife, Geneva, are residents of and domiciled in the
- 20 State of Michigan.
- 21           43. Mr. James Michael Schmitker and his wife, Beverlee, are residents of and domiciled
- 22 in the State of Colorado.
- 23           44. Mr. Christopher Calloway is a resident of and domiciled in the State of Georgia.
- 24           45. Mr. Thomas C Randolph, II and his wife, Evelyn, are residents of and domiciled in
- 25 the State of Virginia.
- 26           46. Mr. Gary Jones and his wife, Tina, are residents of and domiciled in the State of
- 27 Texas.
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- 1 47. Mr. Otis Anderson and his wife, Wanda, are residents of and domiciled in the State
- 2 of New Jersey.
- 3 48. Mr. Leonard Russell and his wife, Tasha, are residents of and domiciled in the State
- 4 of California.
- 5 49. Mr. Rory Graves is a resident of and domiciled in the State of Georgia.
- 6 50. Mr. David M. White and his wife, Monica, are residents of and domiciled in the State
- 7 of New York.
- 8 51. Mr. Philip Smith and his wife, Gail, are residents of and domiciled in the State of
- 9 California.
- 10 52. Mr. W. Vernon Dean is a resident of and domiciled in the State of Texas.
- 11 53. Mr. Anthony Covington is a resident of and domiciled in the State of Pennsylvania.
- 12 54. Mr. Anthony Jones and his wife, Valerie, are residents of and domiciled in the State
- 13 of Alabama.
- 14 55. Mr. Steve Reese and his wife, Marilyn, are residents of and domiciled in the State of
- 15 Georgia.
- 16 56. Mr. Donald Bessilieu is a resident of and domiciled in the State of Georgia.
- 17 57. Mr. Harold L. Jackson and his wife, Carolyn, are residents of and domiciled in the
- 18 State of California.
- 19 58. Mr. Todd Johnson and his wife, Shannon, are residents of and domiciled in the State
- 20 of Florida.
- 21 59. Mr. Chris Goode is a resident of and domiciled in the State of Alabama.
- 22 60. Mr. Bruce Walker and his wife, Vanisha, are residents of and domiciled in the State
- 23 of California.
- 24 61. Mr. Derrick S. Reynolds is a resident of and domiciled in the State of Florida.
- 25 62. Mr. David Lewis and his wife, Bonnie, are residents of and domiciled in the State of
- 26 Florida.

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- 1           63. Mr. Ronnie Lippett and his wife, Sheryl, are residents of and domiciled in the State  
2 of Massachusetts.
- 3           64. Mr. Roland James and his wife, Carmel, are residents of and domiciled in the State of  
4 Massachusetts.
- 5           65. Mr. Mark S. Duper is a resident of and domiciled in the State of Florida.
- 6           66. Mr. Brian Ingram and his wife, Sarca, are residents of and domiciled in the State of  
7 Georgia.
- 8           67. Mr. Anthony Collins and his wife, Trudy, are residents of and domiciled in the State  
9 of North Carolina.
- 10          68. Mr. Steve Nelson and his wife, Angela, are residents of and domiciled in the State of  
11 Massachusetts.
- 12          69. Mr. James E. Willis and his wife, Shalane, are residents of and domiciled in the State  
13 of Alabama.
- 14          70. Mr. Anthony Hancock and his wife, Paula, are residents of and domiciled in the State  
15 of Tennessee.
- 16          71. Mr. Jeff Burriss is a resident of and domiciled in the State of Indiana.
- 17          72. Mr. William C. Bradley and his wife, Susan, are residents of and domiciled in the  
18 State of Texas.
- 19          73. Mr. Kerry Goode and his wife, Tanja, are residents of and domiciled in the State of  
20 Georgia.
- 21          74. Mr. Raymond Clayborn and his wife, Kimberley, are residents of and domiciled in  
22 the State of Georgia.
- 23          75. Mr. Steven Zabel and his wife, Susan, are residents of and domiciled in the State of  
24 Georgia.

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26           Defendants:  
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BT/CL/EB

1 76. Defendant National Football League ("the NFL") is an unincorporated association  
2 with its headquarters located in the State of New York. The NFL regularly conducts business in  
3 California.

4 77. Defendant NFL Properties, LLC as the successor-in-interest to National Football  
5 League Properties Inc. ("NFL Properties") is a limited liability company organized and existing  
6 under the laws of the State of Delaware with its headquarters in the State of New York. NFL  
7 Properties is engaged, among other activities, approving licensing and promoting equipment used  
8 by all the NFL teams. NFL Properties regularly conducts business in California.

9 78. Defendant Riddell, Inc. (d/b/a Riddell Sports Group, Inc.) is a corporation organized  
10 and existing under the laws of the State of Illinois, and is engaged in the business of designing,  
11 manufacturing, selling and distributing football equipment, including helmets, to the NFL and  
12 since 1989 has been the official helmet of the NFL. Riddell, Inc. regularly conducts business in  
13 California.

14 79. Defendant All American Sports Corporation, d/b/a Riddell/All American, is a  
15 corporation organized and existing under the laws of the State of Delaware and is engaged in the  
16 business of designing, manufacturing, selling and distributing football equipment, including  
17 helmets, to the NFL and since 1989 has been the official helmet of the NFL. All American Sports  
18 regularly conducts business in California.

19 80. Defendant Riddell Sports Group, Inc. is a Delaware corporation with its principal  
20 place of business at 6255 N. State Highway, #300, Irving, Texas 76038. Riddell Sports Group, Inc.  
21 regularly conducts business in California.

22 81. Defendant Easton-Bell Sports, Inc. is a California corporation, incorporated in  
23 Delaware with a principal place of business at 7855 Haskell Avenue, Suite 200, Van Nuys,  
24 California 91406 and is a parent corporation of Riddell Sports Group Inc.

25 82. Defendant Easton-Bell Sports, LLC is the parent corporation of Easton-Bell Sports,  
26 Inc. and is incorporated in Delaware, with a principal place of business at 152 West 57<sup>th</sup> Street,  
27 New York, New York 10019. Easton-Bell Sports, LLC regularly conducts business in California.

28  
ORIGINAL

1 83. Defendant EB Sports Corp. is a Delaware corporation with its principal place of  
2 business at 7855 Haskell Avenue, Van Nuys, California 91406.

3 84. Defendant RBG Holdings Corp. is a Delaware corporation with its principal place of  
4 business at 7855 Haskell Avenue, Suite 350, Van Nuys, California 91406.

5 85. Defendants Riddell, Inc., Riddell Sports Group Inc., All American Sports  
6 Corporation, Easton-Bell Sports, Inc., EB Sports Corp., Easton-Bell Sports, LLC, and RBG  
7 Holdings Corp., shall hereinafter be referred to collectively as the "Riddell Defendants."  
8

9 **JURISDICTION AND VENUE**

10 86. Jurisdiction is based upon the California Constitution Article 6, Section 10.

11 87. Venue is proper in this Court pursuant to Section 395 (A) of the California Code of  
12 Civil Procedure.  
13

14 **INTRODUCTION**

15 88. The National Football League was founded as the American Professional Football  
16 Association in 1920.

17 89. The American Professional Football Association changed its name to the National  
18 Football League in 1922. By 1924, there were 23 franchises or teams that devised the NFL.

19 90. The American Football League operated from 1960 to 1969. In 1970, it merged with  
20 the National Football League to create the American Football Conference.

21 91. Today, the National Football League consists of two structured conferences, the AFC  
22 and the NFC, with 32 team members.

23 92. Each team functions as a separate business but operates under shared revenue  
24 generated through broadcasting, merchandising and licensing.

25 93. The Supreme Court of the United States of America in *American Needle, Inc. v. NFL,*  
26 *et al.*, 130 S.Ct. 2201 (U.S. 2010), ruled that the NFL is a separate entity from each of its teams.  
27

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1 94. The NFL is by far the most attended domestic sports league in the world by average  
2 attendance per game with 67,509 fans per game in the regular season (2009).

3 95. The NFL is a 9 billion dollar-a-year business.  
4

#### 5 NFL AND THE CBA

6 96. Until March of 2011, NFL players were all members of a union called the National  
7 Football League Players Association ("NFLPA"). The NFLPA negotiates the general minimum  
8 contract for all players in the league with the National Football League Management Council  
9 ("NFLMC"). This contract is called the Collective Bargaining Agreement ("CBA") and it is the  
10 central document that governs the negotiation of individual player contracts for all of the league's  
11 players. However, historically, the NFL retired players have never been the subject of or a party to  
12 Collective Bargaining.

13 97. The CBA had been in place since 1993 and was amended in 1998 and again in 2006.  
14 The CBA was originally scheduled to expire at the end of the 2012 season but in 2008 the owners  
15 exercised their right to opt-out of the agreement two years earlier. In 2011, the parties in trying to  
16 negotiate a new CBA reached an impasse and the NFL owners locked the players out.  
17 Subsequently, the NFLPA decertified itself as the players' representative for bargaining.

18 98. The plaintiffs herein are all retirees and not covered by the CBA nor are they a  
19 subject of or parties to bargaining between the NFL and the NFLPA. Thus, the plaintiffs' claims  
20 are not preempted by federal labor law since the CBA does not apply to their present claims and,  
21 additionally, it does not currently exist.  
22

#### 23 CTE AND CONCUSSION INJURY

24 99. In 2002, Dr. Bennet Omalu, a forensic pathologist and neuropathologist found  
25 Chronic Traumatic Encephalopathy (CTE) in the brain of Hall of Famer, Mike Webster.

26 100. By 2007, Dr. Omalu found a fourth case linking the death of a former NFL player to  
27 CTE brain damage from his football career.  
28

1 101. Dr. Omalu says that the brain damage he found in four ex-players who died is the  
2 same condition found in punch-drunk boxers.

3 102. Around the same time, researchers without NFL ties surveyed retired football players  
4 and their findings showed that players who had multiple concussions were more likely to report  
5 being diagnosed with depression.

6 103. Dr. Omalu questioned "Where was the NFL when we found this disease?"

7 104. The NFL undertook the responsibility of studying concussion research in 1994  
8 through funding a Committee known as the "NFL Committee on Mild Traumatic Brain Injury".

9 105. The NFL Committee on Mild Traumatic Brain Injury published their findings in  
10 2004 showing "no evidence of worsening injury or chronic cumulative effects" from multiple  
11 concussions. In a related study, this Committee found "many NFL players can be safely allowed to  
12 return to play" on the day of a concussion if they are without symptoms and cleared by a physician.

13 106. As further evidence, Commissioner Roger Goodell in June of 2007 admitted publicly  
14 that the NFL has been studying the effects of traumatic brain injury for "close to 14 years ..."

15 107. It was not until June of 2010 that the NFL acknowledged that concussions can lead to  
16 dementia, memory loss, CTE and related symptoms by publishing warning to every player and  
17 team.

18 **NFL'S DUTY TO PLAYERS AND THE PUBLIC**

19 108. The NFL overtly undertook a duty to study concussions on behalf of all American  
20 Rules Football leagues and players.

21 109. As the industry icon, all American Rules Football leagues modeled their programs  
22 after the NFL.

23 110. In turn, the NFL possesses monopoly power over American Football. As such, it  
24 also possesses monopoly power over the research and education of football injuries to physicians,  
25 trainers, coaches and individuals with brain damage such as Plaintiffs who played in the NFL, as  
26 well as the public at large. As a result, it owed a duty to everyone including individuals such as  
27 Plaintiffs in the following respects:

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- 1 (a) It owed a duty to protect Plaintiffs on the playing field;
- 2 (b) It owed a duty to Plaintiffs to educate them and other
- 3 players in the NFL about CTE and/or concussion injury;
- 4 (c) It owed a duty to Plaintiffs to educate trainers, physicians,
- 5 and coaches about CTE and/or concussion injury;
- 6 (d) It owed a duty to Plaintiffs to have in place strict return-to-play
- 7 guidelines to prevent CTE and/or concussion injury;
- 8 (e) It owed a duty to Plaintiffs to promote a "whistleblower"
- 9 system where teammates would bring to the attention of a
- 10 trainer, physician or coach that another player had sustained
- 11 concussion injury;
- 12 (f) It owed a duty to Plaintiffs to design rules and penalties
- 13 for players who use their head or upper body to hit or tackle;
- 14 (g) It owed a duty to Plaintiffs to design rules to eliminate the risk
- 15 of concussion during games and/or practices;
- 16 (h) It owed a duty to Plaintiffs to promote research into and
- 17 cure for CTE and the effects of concussion injury over a
- 18 period of time; and
- 19 (i) It owed a duty to State governments, local sports organizations, all American Rules
- 20 Football leagues and players, and the public at large to protect against the long-term
- 21 effects of CTE and/or concussion injury.

22  
 23 111. The NFL knew as early as the 1920's of the harmful effects on a player's brain of  
 24 concussions; however, until June of 2010 they concealed these facts from coaches, trainers,  
 25 players, and the public.

26 112. Plaintiffs did not know the long-term effects of concussions and relied on the NFL  
 27 and the Riddell Defendants to protect them.

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1  
2 **NFL'S KNOWLEDGE OF THE RISK OF CONCUSSIONS**

3 113. For decades, Defendants have known that multiple blows to the head can lead to  
4 long-term brain injury, including memory loss, dementia, depression and CTE and its related  
5 symptoms.

6 114. This action arises from the Defendants' failure to warn and protect NFL players, such  
7 as Plaintiffs against the long-term brain injury risks associated with football-related concussions.

8 115. This action arises because the NFL Defendants committed negligence by failing to  
9 exercise its duty to enact league-wide guidelines and mandatory rules regulating post-concussion  
10 medical treatment and return-to-play standards for players who suffer a concussion and/or multiple  
11 concussions.

12 116. By failing to exercise its duty to enact reasonable and prudent rules to protect players  
13 against the risks associated with repeated brain trauma, the NFL's failure to exercise its  
14 independent duty has led to the deaths of some, and brain injuries of many other former players,  
15 including Plaintiffs.

16 117. The following information, which is by no means comprehensive, was available and  
17 easily accessible to Defendants:

18 (a) In the 1890's, Admiral Joseph Mason "Bull" Reeves, who is more  
19 known as the father of carrier aviation, played American football in the  
20 1890's for the Naval Academy. He had suffered so many blows to his  
21 head that a navy doctor advised him that he could risk death or insanity  
22 if he received another kick to his head.

23 (b) In 1913, Glenn "Pop" Warner, commented that he had "many times  
24 seen cases when hard bumps on the head so dazed the player  
25 receiving them that he lost his memory for a time and had to be  
26 removed from the game.";

27 (c) In 1928, the first case of "Punch Drunk" in boxers was published  
28

FE/ST/20

- 1 in the *American Association Journal* by HS Martland;
- 2 (d) A 1937 article on "Dementia pugilistica" was published in the
- 3 *US Navy Medical Bulletin*;
- 4 (e) A 1952 article on "Electroencephalographic changes in professional
- 5 boxers was published in the *American Medical Association*
- 6 *Journal*;
- 7 (f) A 1952 New England Journal of Medicine Article Vol. 246, pp.
- 8 554-556 talked about a three strike rule for concussions in 1945
- 9 - three concussions and you should retire from football;
- 10 (g) A 1954 article on "Observations on the clinical and brain wave
- 11 patterns of professional boxers" was published in the *American*
- 12 *Medical Association Journal*;
- 13 (h) A 1956 article on "Diffuse degeneration of the cerebral white
- 14 matter in severe dementia following head injury" was published
- 15 in the *Neurological, Neurosurgery and Psychiatry Journal*;
- 16 (i) A 1957 article on the "Medical aspects of boxing, particularly
- 17 from a neurological standpoint" was published in the *British*
- 18 *Medical Journal*;
- 19 (j) A 1959 article on the "Observations of the pathology of insidious
- 20 dementia following head injury" was published in the *Journal of*
- 21 *Mental Science*;
- 22 (k) A 1966 article on "Concussion amnesia" in *Neurology*;
- 23 (l) A 1968 article on "brains of boxers" published in *Neurochirurgia*;
- 24 (m) A 1969 report by the Royal College of Physicians of London
- 25 confirmed the danger of chronic brain damage occurring in boxers
- 26 as a result of their careers;
- 27 (n) A 1969 article on "Organic psychosyndromes due boxing" in the
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*British Journal of Psychiatry;*

- (o) A 1969 book on "Brain damage in boxers -- A study of the prevalence of traumatic encephalopathy among ex-professional boxers" by AH Roberts;
- (p) A 1970 article on "retrograde memory immediately after concussion" published in the *Lancet*;
- (q) In 1973, a disabling and sometimes deadly condition involving the second impact concussion occurring before symptoms of a first concussion was described by R.C. Schneider. This later was coined the Second Impact Syndrome in 1984;
- (r) A 1973 article on "the aftermath of boxing" published in *Psychology Medicine*;
- (s) JA Corsellis, CJ Bruton, D Freeman-Browne, *The Aftermath of Boxing*, 3 Psych. Med. 270-303 (1973);
- (t) A 1974 article on "Cerebral concussion and traumatic unconsciousness, Correlation of experimental and clinical observations of blunt head injuries" published in *Brain*;
- (u) A 1974 article on "Traumatic encephalopathy in a young boxer" published in the *Lancet*;
- (v) A 1974 article on "Delayed recovery after mild head injury" was published in the *Lancet*;
- (w) A 1975 article on "cumulative effect of concussion" was published in the *Lancet*;
- (x) J. A. Corsellis, *Brain Damage in Sport*, 1 LANCET 401, 401 (1976) (finding that the brain tissue of fifteen former boxers who sustained multiple head trauma evidenced neuropathological signs of CTE);
- (y) A 1978 article on "Posttraumatic dementia" published in *Aging*;

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- (z) J.C. Maroon, P.B. Steele; R. Berlin, *Football Head & Neck Injuries - An Update*, 27 Clin. Neurosurg. 414-29 (1980);
- (aa) A 1981 article on "Association football injuries to the brain: a preliminary report" published in the *British Journal of Sports Medicine*;
- (bb) H Hugenholtz, MT Richard, *Return to Athletic Competition Following Concussion*, 127(9) Can. Med. Assoc. J. 827-29 (1982);
- (cc) RC Cantu, *Guidelines to Return to Contact After Cerebral Concussion*, 14 The Physician and Sports Medicine 75-83 (1986);
- (dd) Daniel N. Kulund, *The Injured Athlete* 269 (1988). A boxer may be knocked unconscious by the pain of a shot to the eye or neck during a match. See id. Furthermore, a blow to the heart or solar plexus may block the flow of blood and render the fighter unconscious. Any punches to the temporal region may lead to a loss of balance or dizziness;
- (ee) JA Corsellis, *Boxing and the Brain*, 298 BMJ 105-109 (1989);
- (ff) James P. Kelly et al., *Concussion in Sports, Guidelines for the Prevention of Catastrophic Outcome*, 266 JAMA 2868 (1991);
- (gg) B.E. Leininger & J.S. Krentzer, *Neuropsychological Outcome of Adults with Mild Traumatic Brain Injury: Implications for Clinical Practice and Research, in REHABILITATION OF POST-CONCUSSIVE DISORDERS* (L.J. Horn & N.D. Zasler eds., State of the Art Reviews, Physical Medicine and Rehabilitation, Hanley & Belfus, Inc. 1992);
- (hh) RC Cantu, *Cerebral Concussion in Sports*, 14(1) Sports Med. 64-74 (1992);
- (ii) RC Cantu, FO Mueller, *Catastrophic Football Injuries in the USA*, 2(3) Clin. J. Sports Med. 180-85 (1992); and
- (ii) Mild Traumatic Brain Injury Committee of the Head Injury Interdisciplinary Special Interest Group of the American Congress of Rehabilitation Medicine,

1            *Definition of Mild Traumatic Injury*, 8 J. HEAD TRAUMA REHABIL. 86-87  
2            (1993).

3            118. In addition, the NFL's duty to protect the health and safety of its players is further  
4            underscored by the irrefutable evidence that the NFL has previously enacted the following non-  
5            exhaustive list of rules pertaining to players' health and safety:

- 6            (a) In 1956, the NFL enacted a rule that prohibited the grabbing of any player's  
7            facemask, other than the ball carrier;
- 8            (b) In 1962, the NFL enacted a rule that prohibited players from grabbing any player's  
9            facemask;
- 10           (c) In 1976, the NFL enacted a rule that prohibited players from grabbing the facemask  
11           of an opponent. The penalty for an incidental grasp of the facemask was 5 yards.  
12           The penalty for twisting, turning, or pulling the facemask was 15 yards. A player  
13           could be ejected from the game if the foul is judged to be vicious and/or flagrant;
- 14           (d) In 1977, the NFL enacted a rule that prohibited players from slapping the head of  
15           another player during play. This rule was referred to as the "Deacon Jones Rule",  
16           named after the Rams' defensive end who frequently used this technique;
- 17           (e) In 1977, the NFL enacted a rule that prohibited Offensive Linemen from  
18           thrusting their hands into a defender's neck, face, or head;
- 19           (f) In 1979, the NFL enacted a rule that prohibited players from using their helmets to  
20           butt, spear, or ram an opponent. Pursuant to this rule, any player who used the crown  
21           or the top of his helmet unnecessarily will be called for unnecessary roughness;
- 22           (g) In 1980, the NFL enacted rule changes that provided greater restrictions on contact in  
23           the area of the head, neck, and face;
- 24           (h) In 1980, the NFL enacted rule changes that prohibited players from directly striking,  
25           swinging, or clubbing the head, neck, or face ("personal foul"). Beginning in 1980, a  
26           penalty could be called for such contact whether or not the initial contact was made  
27           below the neck area;
- 28

- 1 (i) In 1982, the NFL enacted a rule change by which the penalty for incidental grabbing  
2 of a facemask by a defensive team was changed from 5 yards to an automatic first  
3 down plus a 5 yard penalty;
- 4 (j) In 1983, the NFL enacted a rule that prohibited players from using a helmet  
5 as a weapon to strike or hit an opponent;
- 6 (k) In 1988, the NFL enacted a rule that prohibited defensive players from hitting  
7 quarterbacks below the waist while they are still in the pocket. (The rule was  
8 unofficially called the "Andre Waters Rule" based upon a hit that Waters placed on  
9 Los Angeles Rams quarterback Jim Everett in 1988); and
- 10 (l) Following the 2004-2005 season, the NFL's Competition Committee reviewed video  
11 of the entire season and concluded that the horse-collar tackle resulted in six serious  
12 injuries. On May 23, 2005, the NFL owners voted 27-5 to ban the tackle. The ban  
13 states that a horse-collar tackle is an open-field tackle in which a defender uses the  
14 shoulder pads to immediately bring a ball carrier down.

15  
16 **NFL FRAUDULENTLY CONCEALED THE LONG-TERM EFFECTS OF CONCUSSIONS**

17 119. Instead of taking measures to actually protect its players from suffering long-term  
18 brain injuries, the NFL created the "Mild Traumatic Brain Injury Committee" in 1994 to  
19 purportedly study the effects of concussions on NFL players.

20 120. The Mild Traumatic Brain Injury Committee was chaired by Dr. Elliot Pellman, a  
21 rheumatologist who is not certified as to brain injuries and/or concussions.

22 121. After 14 years of purported studies, and after numerous medical journal articles were  
23 written by the NFL's Mild Traumatic Brain Injury Committee (the "NFL's Brain Injury  
24 Committee"), concluded that "[b]ecause a significant percentage of players returned to play in the  
25 same game [as they suffered a mild traumatic brain injury] and the overwhelming majority of  
26 players with concussions were kept out of football-related activities for less than 1 week, it can be  
27 concluded that mild TBI's in professional football are not serious injuries." See "Concussion in  
28

1 professional football: Summary of the research conducted by the National Football League's  
2 Committee on Mild Traumatic Brain Injury," *Neurosurg Focus* 21 (4):E12, 2006, E.J. Pellman and  
3 D.C. Viano.

4 122. According to the NFL's own committee, the speedy return to play after suffering a  
5 concussion demonstrates that such players were not at a greater risk of suffering long-term brain  
6 injury.

7 123. The NFL-funded study is completely devoid of logic and science. More importantly,  
8 it is contrary to their Health and Safety Rules as well as 75 years of published medical literature on  
9 concussions.

10 124. Between 2002 and 2005, a series of clinical and neuropathological studies performed  
11 by independent scientists and physicians demonstrated that multiple NFL induced-concussions  
12 cause cognitive problems such as depression, early on-set dementia and CTE and its related  
13 symptoms.

14 125. In response to these studies, the NFL, to further a scheme of fraud and deceit, had  
15 members of the NFL's Brain Injury Committee deny knowledge of a link between concussion and  
16 cognitive decline and claim that more time was needed to reach a definitive conclusion on the  
17 issue.

18 126. When the NFL's Brain Injury Committee anticipated studies that would implicate  
19 causal links between concussion and cognitive degeneration it promptly published articles  
20 producing contrary findings, although false, distorted and deceiving as part of the NFL's scheme to  
21 deceive Congress, the players and the public at large.

22 127. Between 2002 and 2007, Dr. Bennet Omalu examined the brain tissue of deceased  
23 NFL players including Mike Webster, Terry Long, Andrew Waters and Justin Strzelczyk. Dr.  
24 Omalu in an article in *Neurosurgery* concluded that chronic traumatic encephalopathy ("CTE")  
25 triggered by multiple NFL concussions represented a partial cause of their deaths.

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1 128. In response to Dr. Omalu's article, the NFL acting thru the NFL's Brain Injury  
2 Committee, Drs. Ira Casson, Elliott Pellman and David Viano wrote a letter to the editor of  
3 *Neurosurgery* asking that Dr. Omalu's article be retracted.

4 129. In 2005, a clinical study performed by Dr. Kevin Guskiewicz found that retired  
5 players who sustained three or more concussions in the NFL had a five-fold prevalence of mild  
6 cognitive impairment. The NFL's Brain Injury Committee, Dr. Mark Lowell, promptly attacked  
7 the article by refusing to accept a survey of 2,400 former NFL players.

8 130. Because of Congressional scrutiny and media pressure, the NFL scheduled a league-  
9 wide Concussion Summit for June 2007. Unfortunately, the NFL in keeping with its scheme of  
10 fraud and deceit issued a pamphlet to players in August 2007, which stated: "there is no magic  
11 number for how many concussions is too many."

12 131. When Boston University's Dr. Ann McKee found CTE in the brains of two more  
13 deceased NFL players in 2008, Dr. Ira Casson characterized each study as an "isolated incident"  
14 from which no conclusion could be drawn.

15 132. At the October 2009 Congressional hearings of the House Judiciary Committee,  
16 committee member Linda Sanchez (D-CA) analogized the NFL's denial of a causal link between  
17 NFL concussion and cognitive decline to the Tobacco industry's denial of the link between  
18 cigarette consumption and ill health effects.

19 133. Since at least 2002, the NFL Committee has been on direct notice of multiple NFL  
20 head injuries contributing to cognitive decline in later life, yet it has never amended the 2007  
21 NFL's Brain Injury Committee statement: "Current research with professional athletes has not  
22 shown that having more than one or two concussions leads to permanent problems... It is  
23 important to understand that there is no magic number for how many concussions is too many."

24 134. As of June 2010, the NFL had yet to amend these inaccurate and misrepresentative  
25 statements to any Plaintiff or retiree.

26 **THE NFL ACKNOWLEDGES THEIR DUTY TO PROTECT AGAINST**  
27 **THE LONG-TERM RISK OF CONCUSSIONS**

1  
2 135. On August 14, 2007, the NFL acknowledged its duty to players by enacting rules to  
3 protect them against the risks associated with repeated brain trauma.

4 136. The NFL's 2007 concussion guidelines, many of which stemmed from an NFL  
5 conference in June of 2007 involving team trainers and doctors, were sent to all current players and  
6 other team personnel.

7 137. The NFL's 2007 guidelines on concussion management include a whistle-blower  
8 provision for individuals to report concussions with the league so that a player with a head injury is  
9 not forced to practice or play against medical advice.

10 138. The NFL's 2007 concussion guidelines also include an informational pamphlet  
11 provided to all current NFL players to aid in identifying symptoms of a concussion. This  
12 information was later withdrawn by one of the outside counsel of the NFL in a separate letter to its  
13 disability plan, as well as the NFL's August 14, 2007 press release denying that "more than one or  
14 two concussions leads to permanent problems".

15 139. In a statement issued by the NFL on August 14, 2007, Roger Goodell, the  
16 Commissioner of the NFL, introduced the NFL's 2007 concussion guidelines by saying, "We want  
17 to make sure all NFL players, coaches and staff members are fully informed and take advantage of  
18 the most up-to-date information and resources as we continue to study the long-term impact of  
19 concussions."

20 140. The NFL's Commissioner also stated, "[b]ecause of the unique and complex nature  
21 of the brain, our goal is to continue to have concussions managed conservatively by outstanding  
22 medical personnel in a way that clearly emphasizes player safety over competitive concerns."

23 141. The NFL's 2007 concussion guidelines provide when a player with a concussion can  
24 return to a game or practice.

25 142. The NFL's 2007 concussion guidelines specifically mandate that a player should  
26 have no concussion symptoms and normal neurological test results before returning to play.

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1 143. For the past many decades until August 14, 2007, the NFL's duty to protect its  
2 players has never changed and has ever waned. The only change that occurred is that on August  
3 14, 2007, the NFL finally and unequivocally acted upon its longstanding duty to protect its member  
4 players by implementing league-wide concussion guidelines.

5 144. Importantly, the NFL themselves acknowledged that the 2007 guidelines were  
6 inadequate and insufficient. As a result, the NFL enacted more strict regulations to handle  
7 concussions starting in the 2009 season. Specifically, the NFL announced new rules on managing  
8 concussions requiring players who exhibit any significant concussion signs to be removed from a  
9 game or practice and be barred from returning the same day.

10 145. Nevertheless, it was not until June of 2010 that the NFL warned any player of the  
11 long-term risks associated with multiple concussions, including dementia, memory loss, CTE and  
12 its related symptoms. The Riddell Defendants also failed to so warn active players until  
13 approximately the same time frame.

14 146. As of today, the NFL Defendants and the Riddell Defendants have never warned any  
15 Plaintiff or retired player of the long-term health effects of concussions.

16  
17 **THE DEFENDANTS' CONDUCT RISES BEYOND MERE NEGLIGENCE**

18 147. The aforementioned acts and omissions of the Defendants demonstrate that the  
19 Defendants acted with callous indifference to the rights and duties owed to Plaintiffs, all American  
20 Rules Football leagues and players and the public at large.

21 148. The Defendants acted willfully, wantonly, egregiously, with reckless abandon, and  
22 with a high degree of moral culpability.

23  
24 **VERNON MAXWELL**

25 149. Plaintiff Vernon Maxwell was born on October 25, 1961 in Birmingham, Alabama.  
26 He lives in Tempe, Arizona.

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1 150. Plaintiff Vernon Maxwell was drafted out of Arizona State University as a  
2 Linebacker. He played for the Baltimore Colts during the 1983 season and was NFL Defensive  
3 Rookie of the Year. During the 1984 season, he played for the Indianapolis Colts. During the  
4 1985-1987 seasons, he played for the Detroit Lions. During the 1989 season, he played for the  
5 Seattle Seahawks.

6 151. Plaintiff Vernon Maxwell suffered multiple concussions that were improperly  
7 diagnosed and improperly treated throughout his career as a professional football player in the  
8 NFL.

9 152. Plaintiff Vernon Maxwell was not warned by the NFL, NFL Properties, Inc., or  
10 Riddell Defendants of the risk of long-term injury due to football-related concussions or that the  
11 league-mandated equipment did not protect him from such injury. This was a substantial factor in  
12 causing his current injury.

13 153. Plaintiff Vernon Maxwell suffers from multiple past traumatic brain injuries with  
14 various symptoms including, but not limited to, memory loss and headaches.

15  
16 **BRODERICK "RICK" JONES**

17 154. Plaintiff Broderick "Rick" Jones was born on March 9, 1955 in Birmingham,  
18 Alabama. He lives in Birmingham, Alabama.

19 155. Plaintiff Broderick "Rick" Jones played Linebacker for the Cleveland Browns from  
20 1977 to 1979 and for the Baltimore Colts from 1980 to 1983.

21 156. Plaintiff Broderick "Rick" Jones suffered multiple concussions in the NFL that were  
22 improperly diagnosed and improperly treated throughout his career as a professional football player  
23 in the NFL.

24 157. Plaintiff Broderick "Rick" Jones was not warned by the NFL, NFL Properties, Inc.,  
25 or Riddell Defendants of the risk of long-term injury due to football-related concussions or that the  
26 league-mandated equipment did not protect him from such injury. This was a substantial factor in  
27 causing his current injury.

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1 158. Plaintiff Broderick "Rick" Jones suffers from multiple past traumatic brain injuries  
2 affecting multiple areas of his brain and causing various symptoms including, but not limited to,  
3 short-term memory loss.

4  
5 KENDALL and INGRID WILLIAMS

6 159. Plaintiff Kendall Williams was born on February 7, 1959 in Long Beach, California.  
7 He is married to Ingrid Williams, and they live in Las Vegas, Nevada. He has three children.

8 160. Plaintiff Kendall Williams graduated from Arizona State University and played  
9 Defensive Back in the NFL during the 1982, 1983 and 1984 seasons for the Dallas Cowboys, the  
10 San Francisco 49er's, and the Baltimore/Indianapolis Colts. The Plaintiff is aware of an NFL film  
11 which showed him being knocked out on the playing field during a game.

12 161. Plaintiff Kendall Williams suffered multiple concussions that were improperly  
13 diagnosed and improperly treated throughout his career as a professional football player in the  
14 NFL.

15 162. Plaintiff Kendall Williams was not warned by the NFL, NFL Properties, Inc., or  
16 Riddell Defendants of the risk of long-term injury due to football-related concussions or that  
17 league-mandated equipment did not protect him from such injury. This was a substantial factor in  
18 causing his current injury.

19 163. Plaintiff Kendall Williams suffers from multiple past traumatic brain injuries  
20 affecting multiple areas of his brain and causing the following symptoms including but not limited  
21 to headaches, memory loss, difficulty reading, and sleeplessness.

22  
23 MIKE C. RICHARDSON

24 164. Plaintiff Mike C. Richardson was born on May 23, 1961 in Compton, California. He  
25 was a second round draft pick out of Arizona State. He lives in Compton, California.

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1 165. Plaintiff Mike C. Richardson played as a Defensive Back for the Chicago Bears from  
2 1983-1988 and then for the Oakland Raiders and the San Francisco 49er's in the 1989 season. He  
3 won the Super Bowl in 1985 and was a NFL All-Pro in 1986.

4 166. Plaintiff Mike C. Richardson suffered multiple concussions that were improperly  
5 diagnosed and improperly treated throughout his career as a professional football player in the  
6 NFL.

7 167. Plaintiff Mike C. Richardson was not warned by the NFL, NFL Properties, Inc., or  
8 Riddell Defendants of the risk of long-term injury due to football-related concussions or that the  
9 league-mandated equipment did not protect him from such injury. This was a substantial factor in  
10 causing his current injury.

11 168. Plaintiff Mike C. Richardson suffers from multiple past traumatic brain injuries  
12 affecting multiple areas of his brain and causing the following symptoms including but not limited  
13 to depression, memory loss, poor judgment, and a history of substance abuse.

14  
15 RENARD and VANESSA YOUNG

16 169. Plaintiff Renard Young was born on July 31, 1961 in Los Angeles, California. He is  
17 married to Vanessa Young. They live in Winnetka, California and have two children.

18 170. Plaintiff Renard Young played the 1984 season for the Kansas City Chiefs.  
19 Subsequently, he played briefly for the Kansas City Chiefs in the 1985 season and then as  
20 Defensive Back for the Seattle Seahawks in the 1987 season.

21 171. Plaintiff Renard Young suffered multiple concussions that were improperly  
22 diagnosed and improperly treated throughout his career as a professional football player in the  
23 NFL.

24 172. Plaintiff Renard Young was not warned by the NFL, NFL Properties, Inc., or Riddell  
25 Defendants of the risk of long-term injury due to football-related concussions or that the league-  
26 mandated equipment did not protect him from such injury. This was a substantial factor in causing  
27 his current injury.

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1 173. Plaintiff Renard Young suffers from multiple past traumatic brain injuries affecting  
2 multiple areas of the brain and causing the following symptoms including but not limited to  
3 headaches and memory loss.  
4

5 LONZELL and LANITA HILL

6 174. Plaintiff LonZell Hill was born on September 25, 1965 in Stockton, California. He is  
7 married to Lanita Hill with two children and stepchildren. They live in Cincinnati, Ohio.

8 175. Plaintiff LonZell Hill was drafted out of the University of Washington as a Wide  
9 Receiver by the New Orleans Saints. He played for the Saints during the 1987, 1988, 1989 and  
10 1990 seasons. While in the NFL, he had multiple concussions. He received no treatment and was  
11 returned to play.

12 176. Plaintiff LonZell Hill suffered multiple concussions that were improperly diagnosed  
13 and improperly treated throughout his career as a professional football player in the NFL.

14 177. Plaintiff LonZell Hill was not warned by the NFL, NFL Properties, Inc., or Riddell  
15 Defendants of the risk of long-term injury due to football-related concussions or that the league-  
16 mandated equipment did not protect him from such injury. This was a substantial factor in causing  
17 his current injury.

18 178. Plaintiff LonZell Hill suffers from multiple past traumatic brain injuries affecting  
19 multiple areas of his brain and causing various symptoms including but not limited to severe short-  
20 term memory loss.  
21

22 GEORGE AND KRISTIE VISGER

23 179. Plaintiff George Visger was born on September 26, 1958 in Stockton, California. He  
24 is married to Kristie Visger. They live in Grass Valley, California with their two minor children  
25 and one step child.

26 180. Plaintiff George Visger was drafted out of the University of Colorado by the N.Y.  
27 Jets in the 1980 NFL draft as a Defensive Lineman. He was released after pre-season by the N.Y.  
28

1 Jets and signed shortly into the 1980 season by the San Francisco 49er's. He played with the 49ers  
2 until an abrupt ending to the season after winning the 1981 Super Bowl.

3 181. Plaintiff George Visger suffered multiple concussions that were improperly  
4 diagnosed and improperly treated during his career as a professional football player in the NFL.

5 182. Plaintiff George Visger was not warned by the NFL, NFL Properties Inc., or Riddell  
6 Defendants of the risk of long-term injury due to football-related concussions or that the league-  
7 mandated equipment did not protect him from such injury. This was a substantial factor in causing  
8 his current injury.

9 183. Plaintiff George Visger suffers from various CTE symptoms including but not  
10 limited to frontal and temporal lobe damage, multiple past traumatic brain injuries affecting  
11 multiple areas of his brain, intermittent explosive disorder, cognitive impairment, poor judgment in  
12 regard to finances and relationships, and early on-set dementia.

13  
14 TERRY WRIGHT

15 184. Plaintiff Terry Wright was born on July 17, 1965 in Phoenix, Arizona. He lives in  
16 Laven, Arizona.

17 185. Plaintiff Terry Wright was a graduate of Temple University. He played two seasons  
18 for the Indianapolis Colts in 1987 and 1988. Prior to that, he was on the practice squad for the  
19 Cleveland Browns from 1986-1987.

20 186. Plaintiff Terry Wright suffered multiple concussions that were improperly diagnosed  
21 and improperly treated throughout his career as a professional football player in the NFL.

22 187. Plaintiff Terry Wright was not warned by the NFL, NFL Properties, Inc., or Riddell  
23 Defendants of the risk of long-term injury due to football-related concussions or that the league-  
24 mandated equipment did not protect him from such injury. This was a substantial factor in causing  
25 his current injury.

26 188. Plaintiff Terry Wright suffers from multiple past traumatic brain injuries including  
27 but not limited to short-term memory loss.

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NEWTON WILLIAMS

189. Plaintiff Newton Williams was born on May 10, 1959 in Charlotte, North Carolina. He lives in Charlotte, North Carolina.

190. Plaintiff Newton Williams graduated from Arizona State University. He played in the NFL as a Running Back. Plaintiff Newton Williams played for the San Francisco 49er's during the 1982 season; played for the Baltimore Colts during the 1983 season; and then played for the Indianapolis Colts during the 1984 season.

191. Plaintiff Newton Williams suffered multiple concussions that were improperly diagnosed and improperly treated throughout his career as a professional player in the NFL.

192. Plaintiff Newton Williams was not warned by the NFL, NFL Properties, Inc., or Riddell Defendants of the risk of long-term injury due to football-related concussions or that the league-mandated equipment did not protect him from such injury. This was a substantial factor in causing his current injury.

193. Plaintiff Newton Williams has been diagnosed with various traumatic brain injury symptoms including but not limited to headaches and memory loss.

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DUANE GALLOWAY

194. Plaintiff Duane Galloway was born on November 7, 1961 in Los Angeles, California. He lives in Los Angeles, California.

195. Plaintiff Duane Galloway played in the NFL as a Cornerback for the Detroit Lions from 1983 until 1987.

196. Plaintiff Duane Galloway suffered multiple concussions that were improperly diagnosed and improperly treated throughout his career as a professional football player in the NFL.

197. Plaintiff Duane Galloway was not warned by the NFL, NFL Properties, Inc., or Riddell Defendants of the risk of long-term injury due to football-related concussions or that the

1 league-mandated equipment did not protect him from such injury. This was a substantial factor in  
2 causing his current injury.

3 198. Plaintiff Duane Galloway has been diagnosed with various traumatic brain injury.  
4 symptoms including but not limited to headaches and memory loss.  
5

6 GEORGE and ARNELLA JAMISON

7 199. Plaintiff George Jamison was born on September 30, 1962 in Bridgeton, New Jersey.  
8 He is married to Arnela Jamison. They live in Rochester Hills, Michigan and have been married  
9 for 16 years. He has two children ages 13 and 14, and one step child who is 25 years old.

10 200. Plaintiff George Jamison was drafted by the Detroit Lions in 1986. Plaintiff played  
11 for the Lions from 1986-1993, from 1994 to 1996 for Kansas City Chiefs, and from 1997 to 1998  
12 for the Detroit Lions. During Plaintiff's entire NFL career, he played as a Linebacker and earned  
13 team awards.

14 201. Plaintiff George Jamison suffered multiple concussive head injuries. His symptoms  
15 included light-headedness, seeing stars and losing track of time. Jamison remembers times that he  
16 was dazed but continued to play because no one took him out of the games. On one occasion while  
17 playing for the Lions, he could not remember anything other than the beginning of a single quarter.

18 202. Plaintiff George Jamison suffered repeated concussions that were improperly  
19 diagnosed and improperly treated throughout his career as a professional football player in the  
20 NFL.

21 203. Plaintiff George Jamison was not warned by the NFL, NFL Properties, Inc., or  
22 Riddell Defendants of the risk of long-term injury due to football-related concussions or that the  
23 league-mandated equipment did not protect him from such injury. This was a substantial factor in  
24 causing his current injury.

25 204. Plaintiff George Jamison suffers from multiple past traumatic brain injuries affecting  
26 multiple areas of his brain which includes but is not limited to the following problems: memory-  
27 related problems, blurred vision and constant headaches.  
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1  
2 **BRYAN HOOKS**

3 205. Plaintiff Bryan Hooks was born on September 15, 1970 in Tempe, Arizona. He lives  
4 in Tempe, Arizona.

5 206. Plaintiff Bryan Hooks played for New England during the 1993, 1994 and 1995  
6 seasons and for the Arizona Cardinals during the 1996 and 1997 season. He played Nose Tackle.

7 206. Plaintiff Bryan Hooks suffered multiple concussions that were improperly diagnosed  
8 and improperly treated throughout his career as a professional football player in the NFL.

9 207. Plaintiff Bryan Hooks was not warned by the NFL, NFL Properties, Inc., or Riddell  
10 Defendants of the risk of long-term injury due to football-related concussions or that the league-  
11 mandated equipment did not protect him from such injury. This was a substantial factor in causing  
12 his current injury.

13 208. Plaintiff Bryan Hooks suffers from multiple past traumatic brain injuries affecting  
14 multiple areas of his brain and includes but is not limited to the following symptoms: distorted  
15 vision or blurry vision in the right eye requiring him to wear corrective glasses and memory loss.

16  
17 **FRED and TIA MCNEILL**

18 209. Plaintiff Fred McNeill was born on May 6, 1952 in Durham, North Carolina. He is  
19 married to Tia McNeill. They live in Los Angeles, California.

20 210. Plaintiff Fred McNeill was drafted in the first round out of UCLA. He played  
21 Linebacker with the Minnesota Vikings from 1974 to 1985 for twelve seasons and played in two  
22 Super Bowls.

23 211. Plaintiff Fred McNeill suffered multiple concussions that were improperly diagnosed  
24 and improperly treated throughout his career as a professional football player in the NFL.

25 212. Plaintiff Fred McNeill was not warned by the NFL, NFL Properties, Inc., or Riddell  
26 Defendants of the risk of long-term injury due to football-related concussions or that the league-



1 mandated equipment did not protect him from such injury. This was a substantial factor in causing  
2 his current injury.

3 213. Plaintiff Fred McNeill suffers from multiple past traumatic brain injuries affecting  
4 multiple areas of his brain causing Plaintiff to suffer from the early stages of dementia.

5  
6 **REGINALD ROGERS, SR.**

7 214. Plaintiff Reginald Rogers, Sr. was born on January 21, 1964 in Sacramento,  
8 California. He lives in Seattle, Washington. He is engaged to be married to Lora Monan. He has  
9 six children ages 9, 11, 18, 21 twins and 26.

10 215. Plaintiff Reginald Rogers, Sr. was drafted in 1987 in the first round by the Detroit  
11 Lions. He played Defensive End for two seasons in 1987 and 1988, with Buffalo in the 1991  
12 season, and for Tampa Bay in the 1992 season.

13 216. Plaintiff Reginald Rogers, Sr. suffered multiple concussions that were improperly  
14 diagnosed and improperly treated throughout his career as a professional football player in the  
15 NFL.

16 217. Plaintiff Reginald Rogers, Sr. was not warned by the NFL, NFL Properties, Inc., or  
17 Riddell Defendants of the risk of long-term injury due to football-related concussions or that the  
18 league-mandated equipment did not protect him from such injury. This was a substantial factor in  
19 causing his current injury.

20 218. Plaintiff Reginald Rogers, Sr. suffers from past traumatic brain injuries affecting  
21 multiple areas of his brain and causing various symptoms including but not limited to: grand-mal  
22 seizures, headaches, loss of hearing and sleeplessness.

23  
24 **MELVIN and JAVONI JENKINS**

25 219. Plaintiff Melvin Jenkins was born on March 16, 1962 in Jackson, Mississippi. He is  
26 married to Javoni Jenkins. They live in Goodyear, Arizona.

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1 220. Plaintiff Melvin Jenkins was selected to play in the NFL from Cincinnati University.  
2 He played as a Defensive Back from 1987 to 1990 for Seattle Seahawks, 1991 to 1993 for Detroit  
3 Lions and 1993 for the Atlanta Falcons.

4 221. Plaintiff Melvin Jenkins suffered multiple concussions that were improperly  
5 diagnosed and improperly treated throughout his career as a professional football player in the  
6 NFL.

7 222. Plaintiff Melvin Jenkins was not warned by the NFL, NFL Properties, Inc. or Riddell  
8 Defendants of the risk of long-term injury due to football-related concussions or that the league-  
9 mandated equipment did not protect him from such injury. This was a substantial factor in causing  
10 his current injury.

11 223. Plaintiff Melvin Jenkins suffers from multiple past traumatic brain injuries that  
12 include but are not limited to his various problems including memory loss.

13  
14 ANTONIO and BETTY GIBSON

15 224. Plaintiff Antonio Gibson was born on July 5, 1962 in Jackson, Mississippi. He is  
16 married to Betty Gibson, and they live in College Station, Texas.

17 225. Plaintiff Antonio Gibson played Safety with the New Orleans Saints and Dallas  
18 Cowboys from 1986 to 1992.

19 226. Plaintiff Antonio Gibson suffered multiple concussions that were improperly  
20 diagnosed and improperly treated throughout his career as a professional football player in the  
21 NFL.

22 227. Plaintiff Antonio Gibson was not warned by the NFL, NFL Properties, Inc., or  
23 Riddell Defendants of the risk of long-term injury due to football-related concussions or that the  
24 league-mandated equipment did not protect him from such injury. This was a substantial factor in  
25 causing his current injury.

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1 228. Plaintiff Antonio Gibson suffers from multiple past traumatic brain injuries that  
2 include but are not limited to his various problems including memory loss, sleeplessness and  
3 headaches.

4  
5 ALVIN and ODETTA MOORE

6 229. Plaintiff Alvin Moore was born on May 3, 1959 in Randolph, Arizona. He is married  
7 to Odetta Moore. They live in Chandler, Arizona.

8 230. Plaintiff Alvin Moore played Running Back with the Baltimore and Indianapolis  
9 Colts from 1983 to 1984, for the Detroit Lions from 1985 to 1986, and for the Seattle Seahawks in  
10 1987.

11 231. Plaintiff Alvin Moore suffered multiple concussions that were improperly diagnosed  
12 and improperly treated throughout his career as a professional football player in the NFL.

13 232. Plaintiff Alvin Moore was not warned by the NFL, NFL Properties, Inc., or Riddell  
14 Defendants of the risk of long-term injury due to football-related concussions or that the league-  
15 mandated equipment did not protect him from such injury. This was a substantial factor in causing  
16 his current injury.

17 233. Plaintiff Alvin Moore suffers from multiple past traumatic brain injuries that include  
18 but are not limited to his various problems including memory loss, ringing in his ears and  
19 headaches.

20  
21 LYVONIA A. "STUMP" MITCHELL

22 234. Plaintiff Lyvonia A. "Stump" Mitchell was born on March 15, 1959 in Kingsland,  
23 Georgia. He lives in Baton Rouge, Louisiana.

24 235. Plaintiff Stump Mitchell played Running Back and Kick Returner for the St.  
25 Louis/Phoenix Cardinals from 1981 to 1989. He has accumulated over 10,000 career all-purpose  
26 yards.

1 236. Plaintiff Stump Mitchell suffered multiple concussions that were improperly  
2 diagnosed and improperly treated throughout his career as a professional football player in the  
3 NFL.

4 237. Plaintiff Stump Mitchell was not warned by the NFL, NFL Properties, Inc., or  
5 Riddell Defendants of the risk of long-term injury due to football-related concussions or that the  
6 league-mandated equipment did not protect him from such injury. This was a substantial factor in  
7 causing his current injury.

8 238. Plaintiff Stump Mitchell suffers from multiple past traumatic brain injuries including,  
9 but not limited to the following: headaches, neck problems, vision problems, and occasional  
10 confusion.

11  
12 **KIRK CAMERON "K.C." JONES**

13 239. Plaintiff Kirk Cameron "K.C." Jones was born on March 28, 1974 in Midland, Texas.  
14 He lives in Lantana, Florida.

15 240. Plaintiff Kirk Cameron "K.C." Jones played Center and Guard for the Denver  
16 Broncos from 1997 to 2002.

17 241. Plaintiff Kirk Cameron "K.C." Jones suffered multiple concussions that were  
18 improperly diagnosed and improperly treated throughout his career as a professional football player  
19 in the NFL.

20 242. Plaintiff Kirk Cameron "K.C." Jones was not warned by the NFL, NFL Properties,  
21 Inc., or Riddell Defendants of the risk of long-term injury due to football-related concussions or  
22 that the league-mandated equipment did not protect him from such injury. This was a substantial  
23 factor in causing his current injury.

24 243. Plaintiff Kirk Cameron "K.C." Jones suffers from multiple past traumatic brain  
25 injuries that include but are not limited to his various problems including short-term memory loss,  
26 lethargy, headaches, and sleep-deprived anxiety.

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1 JAMES E. "TOOTIE" and SHANEETA ROBBINS

2 244. Plaintiff James E. "Tootie" Robbins was born on June 2, 1958 in Windsor, North  
3 Carolina. He lives in Chandler, Arizona. He is married to Shaneeta.

4 245. Plaintiff James E. "Tootie" Robbins played Offensive Tackle for the St. Louis and  
5 Arizona Cardinals and the Green Bay Packers from 1982 to 1993.

6 246. Plaintiff James E. "Tootie" Robbins suffered multiple concussions that were  
7 improperly diagnosed and improperly treated throughout his career as a professional football player  
8 in the NFL.

9 247. Plaintiff James E. "Tootie" Robbins was not warned by the NFL, NFL Properties,  
10 Inc., or Riddell Defendants of the risk of long-term injury due to football-related concussions or  
11 that the league-mandated equipment did not protect him from such injury. This was a substantial  
12 factor in causing his current injury.

13 248. Plaintiff James E. "Tootie" Robbins suffers from multiple past traumatic brain  
14 injuries that include but are not limited to his various problems including headaches and short-term  
15 memory loss.

16  
17 ROBERT J. and BARBARA FREDRICKSON

18 249. Plaintiff Robert J. Fredrickson was born on May 13, 1971 in St. Joseph, Michigan.  
19 He lives in Paradise Valley, Arizona. He is married to Barbara and they have 3 children ages 13, 9  
20 and 7 years old.

21 250. Plaintiff Robert J. Fredrickson played Linebacker for the Los Angeles/Oakland  
22 Raiders from 1994 to 1997, the Detroit Lions in 1998, and Arizona Cardinals from 1999 to 2002.

23 251. Plaintiff Robert J. Fredrickson suffered multiple concussions that were improperly  
24 diagnosed and improperly treated throughout his career as a professional football player in the  
25 NFL.

26 252. Plaintiff Robert J. Fredrickson Robbins was not warned by the NFL, NFL Properties,  
27 Inc., or Riddell Defendants of the risk of long-term injury due to football-related concussions or  
28

1 that the league-mandated equipment did not protect him from such injury. This was a substantial  
2 factor in causing his current injury.

3 253. Plaintiff Robert J. Fredrickson Robbins suffers from multiple past traumatic brain  
4 injuries that include but are not limited to his various problems including headaches, memory loss,  
5 light sensitivity and loss of attention span.

6  
7 CHARLES E. "CHUCKIE" MILLER

8 254. Plaintiff Charles E. "Chuckie" Miller was born on May 9, 1965 in Anniston,  
9 Alabama. He lives in Signal Hill, California. He has 4 children ages 7 months, 7, 19 and 21 years  
10 old.

11 255. Plaintiff Charles E. "Chuckie" Miller played Cornerback for the Indianapolis Colts  
12 from 1987 to 1989.

13 256. Plaintiff Charles E. "Chuckie" Miller suffered multiple concussions that were  
14 improperly diagnosed and improperly treated throughout his career as a professional football player  
15 in the NFL.

16 257. Plaintiff Charles E. "Chuckie" Miller was not warned by the NFL, NFL Properties,  
17 Inc., or Riddell Defendants of the risk of long-term injury due to football-related concussions or  
18 that the league-mandated equipment did not protect him from such injury. This was a substantial  
19 factor in causing his current injury.

20 258. Plaintiff Charles E. "Chuckie" Miller suffers from multiple past traumatic brain  
21 injuries that include but are not limited to his various problems including headaches, short-term  
22 memory loss, and sleeplessness.

23  
24 EDWARD P. and SUSAN LEE

25 259. Plaintiff Edward P. Lee was born on December 8, 1959 in Washington, D.C. He is  
26 married to Susan Lee. They live in Brookeville, Maryland. They have three children ages 18, 12  
27 and 9.

1 260. Plaintiff Edward P. Lee played Wide Receiver for the Detroit Lions from 1982 to  
2 1984.

3 261. Plaintiff Edward P. Lee suffered multiple concussions that were improperly  
4 diagnosed and improperly treated throughout his career as a professional football player in the  
5 NFL.

6 262. Plaintiff Edward P. Lee was not warned by the NFL, NFL Properties, Inc., or Riddell  
7 Defendants of the risk of long-term injury due to football-related concussions or that the league-  
8 mandated equipment did not protect him from such injury. This was a substantial factor in causing  
9 his current injury.

10 263. Plaintiff Edward P. Lee suffers from multiple past traumatic brain injuries that  
11 include but are not limited to his various problems including memory loss.

12  
13 PATRICK and SHARRON HEENAN

14 264. Plaintiff Patrick Heenan was born on March 1, 1938 in Detroit, Michigan. He is  
15 married to Sharron. They live in Lenoir City, Tennessee.

16 265. Plaintiff Patrick Heenan played Cornerback for the Washington Redskins from 1960  
17 to 1961.

18 266. Plaintiff Patrick Heenan suffered multiple concussions that were improperly  
19 diagnosed and improperly treated throughout his career as a professional football player in the  
20 NFL.

21 267. Plaintiff Patrick Heenan was not warned by the NFL, NFL Properties, Inc., or Riddell  
22 Defendants of the risk of long-term injury due to football-related concussions or that the league-  
23 mandated equipment did not protect him from such injury. This was a substantial factor in causing  
24 his current injury.

25 268. Plaintiff Patrick Heenan suffers from multiple past traumatic brain injuries that  
26 include but are not limited to his various problems including short-term memory loss, headaches,  
27 and ringing in ears.

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TOBY L. WRIGHT

269. Plaintiff Toby L. Wright was born on November 19, 1970 in Phoenix, Arizona. He lives in Tempe, Arizona.

270. Plaintiff Toby L. Wright played Strong Safety for the Los Angeles Rams in 1994, for the St. Louis Rams from 1995 to 1998, and for the Washington Redskins in 1999. He was selected as an NFL All-Pro in 1996.

271. Plaintiff Toby L. Wright suffered multiple concussions that were improperly diagnosed and improperly treated throughout his career as a professional football player in the NFL.

272. Plaintiff Toby L. Wright was not warned by the NFL, NFL Properties, Inc., or Riddell Defendants of the risk of long-term injury due to football-related concussions or that the league-mandated equipment did not protect him from such injury. This was a substantial factor in causing his current injury.

273. Plaintiff Toby L. Wright suffers from multiple past traumatic brain injuries that include but are not limited to his various problems including short-term memory loss, headaches, depression, ringing in ears, and blurry vision.

KELLY KIRCHBAUM

274. Plaintiff Kelly Kirchbaum was born on June 14, 1957 in Fort Knox, Kentucky. He lives in Lexington, Kentucky.

275. Plaintiff Kelly Kirchbaum played Middle Linebacker and Special Teams for the New York Jets from 1979 to 1980, for the Kansas City Chiefs in 1981, and for the Philadelphia Eagles in 1987.

276. Plaintiff Kelly Kirchbaum suffered multiple concussions that were improperly diagnosed and improperly treated throughout his career as a professional football player in the NFL.

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1 277. Plaintiff Kelly Kirchbaum was not warned by the NFL, NFL Properties, Inc., or  
2 Riddell Defendants of the risk of long-term injury due to football-related concussions or that the  
3 league-mandated equipment did not protect him from such injury. This was a substantial factor in  
4 causing his current injury.

5 278. Plaintiff Kelly Kirchbaum suffers from multiple past traumatic brain injuries that  
6 include but are not limited to his various problems including from confusion, memory loss, and  
7 dizziness.

8  
9 **JAMES and BONITA HOOD**

10 279. Plaintiff James Hood lives in Inglewood, California. He was born on September 9,  
11 1961. He is married to Bonita Hood. They have 3 children ages 23, 20 and 18 years old.

12 280. Plaintiff James Hood played Wide Receiver for the Seattle Seahawks from 1987 to  
13 1988.

14 281. Plaintiff James Hood suffered multiple concussions that were improperly diagnosed  
15 and improperly treated throughout his career as a professional football player in the NFL.

16 282. Plaintiff James Hood was not warned by the NFL, NFL Properties, Inc., or Riddell  
17 Defendants of the risk of long-term injury due to football-related concussions or that the league-  
18 mandated equipment did not protect him from such injury. This was a substantial factor in causing  
19 his current injury.

20 283. Plaintiff James Hood suffers from multiple past traumatic brain injuries that include  
21 but are not limited to his various problems including memory loss and headaches.

22  
23 **RICHARD and YADIRA MERCIER**

24 284. Plaintiff Richard Mercier was born on May 13, 1975 in Quebec, Canada. He is  
25 married to Yadira Mercier. They live in Miami, Florida. They have one child age 9 months.

26 285. Plaintiff Richard Mercier played Offensive Lineman for the Baltimore Ravens,  
27 Denver Broncos and Cleveland Browns from 2000 to 2003.

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1 286. Plaintiff Richard Mercier suffered multiple concussions that were improperly  
2 diagnosed and improperly treated throughout his career as a professional football player in the  
3 NFL.

4 287. Plaintiff Richard Mercier was not warned by the NFL, NFL Properties, Inc., or  
5 Riddell Defendants of the risk of long-term injury due to football-related concussions or that the  
6 league-mandated equipment did not protect him from such injury. This was a substantial factor in  
7 causing his current injury.

8 288. Plaintiff Richard Mercier suffers from multiple past traumatic brain injuries that  
9 include but are not limited to his various problems including memory loss.

10

11 BRETT and EMILY ROMBERG

12 289. Plaintiff Brett Romberg was born on October 10, 1979 in Windsor, Canada. He is  
13 married to Emily Romberg. They live in Coral Gables, Florida.

14 290. Plaintiff Brett Romberg played Center for the Jacksonville Jaguars, St. Louis Rams  
15 and Atlanta Falcons from 2003 to 2010.

16 291. Plaintiff Brett Romberg suffered multiple concussions that were improperly  
17 diagnosed and improperly treated throughout his career as a professional football player in the  
18 NFL.

19 292. Plaintiff Brett Romberg was not warned by the NFL, NFL Properties, Inc., or Riddell  
20 Defendants of the risk of long-term injury due to football-related concussions or that the league-  
21 mandated equipment did not protect him from such injury. This was a substantial factor in causing  
22 his current injury.

23 293. Plaintiff Brett Romberg suffers from multiple past traumatic brain injuries that  
24 include but are not limited to his various problems including headaches.

25

26 STEVE and KARELIS KORTE

27

28

11/21/20

1 294. Plaintiff Steve Korte was born January 15, 1960 in Denver, Colorado. He is married  
2 to Karelis Korte. They live in Covington, Louisiana. They have three children ages 25, 21 and 19.

3 295. Plaintiff Steve Korte played Center for the New Orleans Saints from 1983 to 1990.

4 296. Plaintiff Steve Korte suffered multiple concussions that were improperly diagnosed  
5 and improperly treated throughout his career as a professional football player in the NFL.

6 297. Plaintiff Steve Korte was not warned by the NFL, NFL Properties, Inc., or Riddell  
7 Defendants of the risk of long-term injury due to football-related concussions or that the league-  
8 mandated equipment did not protect him from such injury. This was a substantial factor in causing  
9 his current injury.

10 298. Plaintiff Steve Korte suffers from multiple past traumatic brain injuries that include  
11 but are not limited to his various problems including depression, short-term memory loss and  
12 headaches.

13  
14 **JOE and LYDIA HARRIS**

15 299. Plaintiff Joe Harris was born on December 6, 1952 in Fayetteville, North Carolina.  
16 He is married to Lydia Harris. They live in Ellenwood, Georgia.

17 300. Plaintiff Joe Harris played Linebacker for the Los Angeles Raiders, Baltimore  
18 Ravens, San Francisco 49ers, and Minnesota Vikings from 1977 to 1983.

19 301. Plaintiff Joe Harris suffered multiple concussions that were improperly diagnosed  
20 and improperly treated throughout his career as a professional football player in the NFL.

21 302. Plaintiff Joe Harris was not warned by the NFL, NFL Properties, Inc., or Riddell  
22 Defendants of the risk of long-term, injury due to football-related concussions or that the league-  
23 mandated equipment did not protect him from such injury. This was a substantial factor in causing  
24 his current injury.

25 303. Plaintiff Joe Harris suffers from multiple past traumatic brain injuries that include but  
26 are not limited to his various problems including memory loss, confusion and dementia.

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**RODNEY and ANDETRIA HAMPTON**

304. Plaintiff Rodney Hampton was born on April 3, 1969 in Houston, Texas. He is married to Andetria Hampton. They live in Houston, Texas. They have three children ages 16, 12 and 4.

305. Plaintiff Rodney Hampton played Running Back for the New York Giants from 1990 to 1997. He played in two Pro Bowls in 1992 and 1993 and won Super Bowl XXV.

306. Plaintiff Rodney Hampton suffered multiple concussions that were improperly diagnosed and improperly treated throughout his career as a professional football player in the NFL.

307. Plaintiff Rodney Hampton was not warned by the NFL, NFL Properties, Inc., or Riddell Defendants of the risk of long-term injury due to football-related concussions or that the league-mandated equipment did not protect him from such injury. This was a substantial factor in causing his current injury.

308. Plaintiff Rodney Hampton suffers from multiple past traumatic brain injuries that include but are not limited to his various problems including short-term memory loss and headaches.

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**LEWIS D. and KATHY TILLMAN**

309. Plaintiff Lewis D. Tillman was born on April 16, 1966 in Oklahoma City, Oklahoma. He is married to Kathy Tillman. They live in Madison, Mississippi. They have two children ages 19 and 15.

310. Plaintiff Lewis D. Tillman played Running Back for the New York Giants and Chicago Bears from 1989 to 1996.

311. Plaintiff Lewis D. Tillman suffered multiple concussions that were improperly diagnosed and improperly treated throughout his career as a professional football player in the NFL.

1 312. Plaintiff Lewis D. Tillman was not warned by the NFL, NFL Properties, Inc., or  
2 Riddell Defendants of the risk of long-term injury due to football-related concussions or that the  
3 league-mandated equipment did not protect him from such injury. This was a substantial factor in  
4 causing his current injury.

5 313. Plaintiff Lewis D. Tillman suffers from multiple past traumatic brain injuries that  
6 include but are not limited to his various problems including poor memory and headaches.

7  
8 LARRY and LINDA KAMINSKI

9 314. Plaintiff Larry Kaminski was born on January 6, 1945 in Cleveland, Ohio. He is  
10 married to Linda Kaminski. They live in Poulsbo, Washington.

11 315. Plaintiff Larry Kaminski played Center for the Denver Broncos from 1966 to 1973.

12 316. Plaintiff Larry Kaminski suffered multiple concussions that were improperly  
13 diagnosed and improperly treated throughout his career as a professional football player in the  
14 NFL.

15 317. Plaintiff Larry Kaminski was not warned by the NFL, NFL Properties, Inc., or  
16 Riddell Defendants of the risk of long-term injury due to football-related concussions or that the  
17 league-mandated equipment did not protect him from such injury. This was a substantial factor in  
18 causing his current injury.

19 318. Plaintiff Larry Kaminski suffers from multiple past traumatic brain injuries that  
20 include but are not limited to his various problems including frontal temporal lobe damage,  
21 explosive mood changes, aggressiveness and depression.

22  
23 DAVID and MARY LEE KOCOUREK

24 319. Plaintiff David Kocourek was born on August 20, 1937 in Chicago, Illinois. He is  
25 married to Mary Lee Kocourek. They live in Marco Island, Florida.

1 320. Plaintiff David Kocourek played Tight End for the Los Angeles Chargers in 1960, for  
2 the San Diego Giants from 1961 to 1965, for the Miami Dolphins in 1966, and for the Oakland  
3 Raiders from 1967 to 1968.

4 321. Plaintiff David Kocourek suffered multiple concussions that were improperly  
5 diagnosed and improperly treated throughout his career as a professional football player in the  
6 NFL.

7 322. Plaintiff David Kocourek was not warned by the NFL, NFL Properties, Inc., or  
8 Riddell Defendants of the risk of long-term injury due to football-related concussions or that the  
9 league-mandated equipment did not protect him from such injury. This was a substantial factor in  
10 causing his current injury.

11 323. Plaintiff David Kocourek suffers from multiple past traumatic brain injuries that  
12 include but are not limited to his various problems including dementia.

13  
14 **ROBERT and DENISE WEATHERS**

15 324. Plaintiff Robert Weathers was born on September 16, 1960 in Westfield, NY. He is  
16 married to Denise Weathers. They live in Orlando, Florida.

17 325. Plaintiff Robert Weathers played Running Back for the New England Patriots from  
18 1982 to 1988.

19 326. Plaintiff Robert Weathers suffered multiple concussions that were improperly  
20 diagnosed and improperly treated throughout his career as a professional football player in the  
21 NFL.

22 327. Plaintiff Robert Weathers was not warned by the NFL, NFL Properties, Inc., or  
23 Riddell Defendants of the risk of long-term injury due to football-related concussions or that the  
24 league-mandated equipment did not protect him from such injury. This was a substantial factor in  
25 causing his current injury.

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1 328. Plaintiff Robert Weathers suffers from multiple past traumatic brain injuries that  
2 include but are not limited to his various problems including short-term memory loss and  
3 headaches.

4  
5 WAYNE and SHARON HAWKINS

6 329. Plaintiff Wayne Hawkins was born on June 17, 1938 in Fort Peck, Montana. He is  
7 married to Sharon Hawkins. They live in San Ramon, California.

8 330. Plaintiff Wayne Hawkins played Right Guard for the Oakland Raiders from 1960 to  
9 1971.

10 331. Plaintiff Wayne Hawkins suffered multiple concussions that were improperly  
11 diagnosed and improperly treated throughout his career as a professional football player in the  
12 NFL.

13 332. Plaintiff Wayne Hawkins was not warned by the NFL, NFL Properties, Inc., or  
14 Riddell Defendants of the risk of long-term injury due to football-related concussions or that the  
15 league-mandated equipment did not protect him from such injury. This was a substantial factor in  
16 causing his current injury.

17 333. Plaintiff Wayne Hawkins suffers from multiple past traumatic brain injuries that  
18 include but are not limited to his various problems including dementia and myopathy.

19  
20 ANTHONY "TONY" HARGAIN

21 334. Plaintiff Anthony "Tony" Hargain was born on December 26, 1967 in Palo Alto,  
22 California. He lives in Citrus Heights, California.

23 335. Plaintiff Anthony "Tony" Hargain played Wide Receiver for the San Francisco  
24 Giants in 1991, for the Kansas City Chiefs from 1992 to 1993, for the Los Angeles Rams in 1993,  
25 and for the Denver Broncos in 1996.

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1 336. Plaintiff Anthony "Tony" Hargain suffered multiple concussions that were  
2 improperly diagnosed and improperly treated throughout his career as a professional football player  
3 in the NFL.

4 337. Plaintiff Anthony "Tony" Hargain was not warned by the NFL, NFL Properties, Inc.,  
5 or Riddell Defendants of the risk of long-term injury due to football-related concussions or that the  
6 league-mandated equipment did not protect him from such injury. This was a substantial factor in  
7 causing his current injury.

8 338. Plaintiff Anthony "Tony" Hargain suffers from multiple past traumatic brain injuries  
9 that include but are not limited to his various problems including headaches, memory loss, and  
10 sleeplessness.

11  
12 EDWARD "EDDIE" and RICA PAYTON

13 339. Plaintiff Edward "Eddie" Payton was born on August 3, 1950 in Columbia,  
14 Mississippi. He is married to Rica Payton. They live in Madison, Mississippi.

15 340. Plaintiff Edward "Eddie" Payton played Running Back and Kick Returner for the  
16 Cleveland Browns and the Detroit Lions in 1977, for the Kansas City Chiefs in 1978, and for the  
17 Minnesota Vikings from 1980 to 1982.

18 341. Plaintiff Edward "Eddie" Payton suffered multiple concussions that were improperly  
19 diagnosed and improperly treated throughout his career as a professional football player in the  
20 NFL.

21 342. Plaintiff Edward "Eddie" Payton was not warned by the NFL, NFL Properties, Inc.,  
22 or Riddell Defendants of the risk of long-term injury due to football-related concussions or that the  
23 league-mandated equipment did not protect him from such injury. This was a substantial factor in  
24 causing his current injury.

25 343. Plaintiff Edward "Eddie" Payton suffers from multiple past traumatic brain injuries  
26 that include but are not limited to his various problems including headaches, lack of focus,  
27 confusion, and short-term memory loss.

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1  
2 WILLIAM H. "PETE" and TERESA MANDLEY

3 344. Plaintiff William H. "Pete" Mandley was born on July 29, 1961 Mesa, Arizona. He  
4 is married to Teresa Mandley. They live in Gilbert, Arizona. They have eight children, two of  
5 which are minors ages . and 14 years old.

6 345. Plaintiff William H. "Pete" Mandley played Wide Receiver and Kick Returner for  
7 the Detroit Lions from 1984 to 1988 and for the Kansas City Chiefs from 1989 to 1990.

8 346. Plaintiff William H. "Pete" Mandley suffered multiple concussions that were  
9 improperly diagnosed and improperly treated throughout his career as a professional football player  
10 in the NFL.

11 347. Plaintiff William H. "Pete" Mandley was not warned by the NFL, NFL Properties,  
12 Inc., or Riddell Defendants of the risk of long-term injury due to football-related concussions or  
13 that the league-mandated equipment did not protect him from such injury. This was a substantial  
14 factor in causing his current injury.

15 348. Plaintiff William H. "Pete" Mandley suffers from multiple past traumatic brain  
16 injuries that include but are not limited to his various problems including lack of focus, headaches,  
17 and memory loss.

18  
19 SHANTE CARVER

20 349. Plaintiff Shante Carver was born on February 12, 1971 in Stockton, California. He  
21 lives in Mesa, Arizona.

22 350. Plaintiff Shante Carver played Defensive End for the Dallas Cowboys from 1994 to  
23 1997.

24 351. Plaintiff Shante Carver suffered multiple concussions that were improperly  
25 diagnosed and improperly treated throughout his career as a professional football player in the  
26 NFL.

1 352. Plaintiff Shante Carver was not warned by the NFL, NFL Properties, Inc., or Riddell  
2 Defendants of the risk of long-term injury due to football-related concussions or that the league-  
3 mandated equipment did not protect him from such injury. This was a substantial factor in causing  
4 his current injury.

5 353. Plaintiff Shante Carver suffers from multiple past traumatic brain injuries that  
6 include but are not limited to his various problems including headaches, lack of focus, confusion,  
7 and short-term memory loss.

8  
9 **GEORGE and GENEVA GOEDDEKE**

10 354. Plaintiff George Goeddeke Carver was born on July 29, 1945 in Detroit, Michigan.  
11 He is married to Geneva Goeddeke. They live in White Lake, Michigan. They have five children,  
12 with the youngest age 18.

13 355. Plaintiff George Goeddeke played Offensive Guard for the Denver Broncos from  
14 1967 to 1974.

15 356. Plaintiff George Goeddeke suffered multiple concussions that were improperly  
16 diagnosed and improperly treated throughout his career as a professional football player in the  
17 NFL.

18 357. Plaintiff George Goeddeke was not warned by the NFL, NFL Properties, Inc., or  
19 Riddell Defendants of the risk of long-term injury due to football-related concussions or that the  
20 league-mandated equipment did not protect him from such injury. This was a substantial factor in  
21 causing his current injury.

22 358. Plaintiff George Goeddeke suffers from multiple past traumatic brain injuries that  
23 include but are not limited to his various problems including short-term memory loss.

24  
25 **JAMES MICHAEL "MIKE" and BEVERLEE SCHNITKER**

26 359. Plaintiff James Michael "Mike" Schnitker was born on December 30, 1946 in  
27 Langdon, Missouri. He is married to Beverlee Schnitker. They have three children.

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1 360. Plaintiff James Michael "Mike" Schmitker played Offensive Guard for the Denver  
2 Broncos from 1969 to 1974.

3 361. Plaintiff James Michael "Mike" Schmitker suffered multiple concussions that were  
4 improperly diagnosed and improperly treated throughout his career as a professional football player  
5 in the NFL.

6 362. Plaintiff James Michael "Mike" Schmitker was not warned by the NFL, NFL  
7 Properties, Inc., or Riddell Defendants of the risk of long-term injury due to football-related  
8 concussions or that the league-mandated equipment did not protect him from such injury. This was  
9 a substantial factor in causing his current injury.

10 363. Plaintiff James Michael "Mike" Schmitker suffers from multiple past traumatic brain  
11 injuries that include but are not limited to his various problems including memory loss.

12

13 CHRISTOPHER "CHRIS" CALLOWAY

14 364. Plaintiff Christopher "Chris" Calloway was born on March 29, 1968 in Chicago,  
15 Illinois.

16 365. Plaintiff Christopher "Chris" Calloway played Wide Receiver for the Pittsburgh  
17 Steelers from 1990 to 1991, for the New York Giants from 1992 to 1998, for the Atlanta Falcons in  
18 1999, and for the New England Patriots in 2000.

19 366. Plaintiff Christopher "Chris" Calloway suffered multiple concussions that were  
20 improperly diagnosed and improperly treated throughout his career as a professional football player  
21 in the NFL.

22 367. Plaintiff Christopher "Chris" Calloway was not warned by the NFL, NFL Properties,  
23 Inc., or Riddell Defendants of the risk of long-term injury due to football-related concussions or  
24 that the league-mandated equipment did not protect him from such injury. This was a substantial  
25 factor in causing his current injury.

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1 368. Plaintiff Christopher "Chris" Calloway suffers from multiple past traumatic brain  
2 injuries that include but are not limited to his various problems including tingling in the head and  
3 neck, memory loss, and headaches.  
4

5 **THOMAS C. and EVELYN RANDOLPH**

6 369. Plaintiff Thomas C. Randolph, II was born on October 5, 1970 in Norfolk, Virginia.  
7 He is married to Evelyn Randolph. They live in McLean, Virginia. They have two children ages  
8 10 and 11 months.

9 370. Plaintiff Thomas C. Randolph played Defensive Back for the New York Giants from  
10 1994 to 1997, for the Cincinnati Bengals in 1998, and for the Indianapolis Colts in 1999.

11 371. Plaintiff Thomas C. Randolph suffered multiple concussions that were improperly  
12 diagnosed and improperly treated throughout his career as a professional football player in the  
13 NFL.

14 372. Plaintiff Thomas C. Randolph was not warned by the NFL, NFL Properties, Inc., or  
15 Riddell Defendants of the risk of long-term injury due to football-related concussions or that the  
16 league-mandated equipment did not protect him from such injury. This was a substantial factor in  
17 causing his current injury.

18 373. Plaintiff Thomas C. Randolph suffers from multiple past traumatic brain injuries that  
19 include but are not limited to his various problems including short-term memory loss and severe  
20 headaches.  
21

22 **GARY and TINA JONES**

23 374. Plaintiff Gary Jones was born on November 30, 1967 in San Augustine, Texas. He is  
24 married to Tina Jones. They live in Cedar Hill Texas.

25 375. Plaintiff Gary Jones played Safety for the Pittsburgh Steelers from 1990 to 1994, and  
26 for the New York Jets from 1995 to 1996.  
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1 376. Plaintiff Gary Jones suffered multiple concussions that were improperly diagnosed  
2 and improperly treated throughout his career as a professional football player in the NFL.

3 377. Plaintiff Gary Jones was not warned by the NFL, NFL Properties, Inc., or Riddell  
4 Defendants of the risk of long-term injury due to football-related concussions or that the league-  
5 mandated equipment did not protect him from such injury. This was a substantial factor in causing  
6 his current injury.

7 378. Plaintiff Gary Jones suffers from multiple past traumatic brain injuries that include  
8 but are not limited to his various problems including depression, mood disorder, anxiety problems  
9 and memory loss.

10  
11 OTTIS "O.J." and WANDA ANDERSON

12 379. Plaintiff Otis "O.J." Anderson was born on January 19, 1957 in West Palm Beach,  
13 Florida. He lives in Orange, New Jersey. He is married to Wanda.

14 380. Plaintiff O.J. Anderson played Running Back for the St. Louis Cardinals from 1979  
15 to 1985 and the New York Giants from 1986 to 1992. He is one of 22 Running Backs to rush for  
16 over 10,000 career yards. He is a two time All-Pro selection. He is a two time Super Bowl  
17 champion. He was selected as the MVP of Super Bowl XXV.

18 381. Plaintiff O.J. Anderson suffered multiple concussions that were improperly  
19 diagnosed and improperly treated throughout his career as a professional football player in the  
20 NFL.

21 382. Plaintiff O.J. Anderson was not warned by the NFL, NFL Properties, Inc., or Riddell  
22 Defendants of the risk of long-term injury due to football-related concussions or that the league-  
23 mandated equipment did not protect him from such injury. This was a substantial factor in causing  
24 his current injury.

25 383. Plaintiff O.J. Anderson suffers from multiple past traumatic brain injuries that  
26 include but are not limited to his various problems including Short term memory loss and  
27 headaches.

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LEONARD and TASHA RUSSELL

384. Plaintiff Leonard Russell was born on November 17, 1969. He was born in California. He currently lives in Riverside, California. He is married to Tasha Russell.

385. Plaintiff Leonard Russell played Running Back for the New England Patriots from 1991 to 1993, Denver Broncos in 1994, St. Louis Rams in 1995 and San Diego Chargers in 1996. He was selected as the AP Offensive Rookie of the Year in 1991.

386. Plaintiff Leonard Russell suffered multiple concussions that were improperly diagnosed and improperly treated throughout his career as a professional football player in the NFL.

387. Plaintiff Leonard Russell was not warned by the NFL, NFL Properties, Inc., or Riddell Defendants of the risk of long-term injury due to football-related concussions or that the league-mandated equipment did not protect him from such injury. This was a substantial factor in causing his current injury.

388. Plaintiff Leonard Russell suffers from multiple past traumatic brain injuries that include but are not limited to his various problems including memory loss, headaches and blurry vision.

RORY GRAVES

389. Plaintiff Rory Graves was born on July 21, 1963. He was born in Atlanta, Georgia. He currently lives in Doraville, Georgia.

390. Plaintiff Rory Graves played Offensive Tackle for the Oakland Raiders from 1988 to 1991 and the Minnesota Vikings in 1993.

391. Plaintiff Rory Graves suffered multiple concussions that were improperly diagnosed and improperly treated throughout his career as a professional football player in the NFL.

392. Plaintiff Rory Graves was not warned by the NFL, NFL Properties, Inc., or Riddell Defendants of the risk of long-term injury due to football-related concussions or that the league-

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1 mandated equipment did not protect him from such injury. This was a substantial factor in causing  
2 his current injury.

3 393. Plaintiff Rory Graves suffers from multiple past traumatic brain injuries that include  
4 but are not limited to his various problems including memory loss and headaches.

5  
6 **DAVID M. and MONICA WHITE**

7 394. Plaintiff David M. White was born on February 27, 1970. He is married to Monica  
8 White. He was born in Oak Ridge, Tennessee. He currently lives in New York with his wife,  
9 Monica.

10 395. Plaintiff David M. White played Line Backer for New England Patriots and Buffalo  
11 Bills between 1993 and 1997.

12 396. Plaintiff David M. White suffered multiple concussions that were improperly  
13 diagnosed and improperly treated throughout his career as a professional football player in the  
14 NFL.

15 397. Plaintiff David M. White was not warned by the NFL, NFL Properties, Inc., or  
16 Riddell Defendants of the risk of long-term injury due to football-related concussions or that the  
17 league-mandated equipment did not protect him from such injury. This was a substantial factor in  
18 causing his current injury.

19 398. Plaintiff David M. White suffers from multiple past traumatic brain injuries that  
20 include but are not limited to his various problems including memory loss, headaches and difficulty  
21 sleeping.

22  
23 **PHILIP and GAIL SMITH**

24 399. Plaintiff Philip Smith was born on April 28, 1961. He is married to Gail. He  
25 currently lives in Los Angeles, California. They have 3 children ages 13, 10 and 8 years old.

26 400. Plaintiff Philip Smith played Wide Receiver and Kick Returner for  
27 Baltimore/Indianapolis Colts, Philadelphia Eagles, and Los Angeles Rams from 1983 to 1989.

1 401. Plaintiff Philip Smith suffered multiple concussions that were improperly diagnosed  
2 and improperly treated throughout his career as a professional football player in the NFL.

3 402. Plaintiff Philip Smith was not warned by the NFL, NFL Properties, Inc., or Riddell  
4 Defendants of the risk of long-term injury due to football-related concussions or that the league-  
5 mandated equipment did not protect him from such injury. This was a substantial factor in causing  
6 his current injury.

7 403. Plaintiff Philip Smith suffers from multiple past traumatic brain injuries that include  
8 but are not limited to his various problems including Short Term Memory Loss.

9  
10 W. VERNON DEAN

11 404. Plaintiff W. Vernon Dean was born on May 5, 1959. He was born in Texas and  
12 currently lives in Missouri City, Texas. He has 2 children ages 28 and 12 years old.

13 405. Plaintiff W. Vernon Dean played Defensive Back for the Washington Redskins from  
14 1982 to 1988 and for the Seattle Seahawks in 1999. He won Super Bowl XVII and XXII.

15 406. Plaintiff W. Vernon Dean suffered multiple concussions that were improperly  
16 diagnosed and improperly treated throughout his career as a professional football player in the  
17 NFL.

18 407. Plaintiff W. Vernon Dean was not warned by the NFL, NFL Properties, Inc., or  
19 Riddell Defendants of the risk of long-term injury due to football-related concussions or that the  
20 league-mandated equipment did not protect him from such injury. This was a substantial factor in  
21 causing his current injury.

22 408. Plaintiff W. Vernon Dean suffers from multiple past traumatic brain injuries that  
23 include but are not limited to his various problems including Short Term Memory Loss and  
24 Headaches.

25  
26 ANTHONY "TONY" COVINGTON

11/26/28



1 409. Plaintiff Tony Covington was born on December 26, 1967. He was born in North  
2 Carolina. He currently lives in Philadelphia, Pennsylvania.

3 410. Plaintiff Tony Covington played Safety for the Tampa Bay Buccaneers from 1991 to  
4 1994 and Seattle Seahawks in 1995.

5 411. Plaintiff Tony Covington suffered multiple concussions that were improperly  
6 diagnosed and improperly treated throughout his career as a professional football player in the  
7 NFL.

8 412. Plaintiff Tony Covington was not warned by the NFL, NFL Properties, Inc., or  
9 Riddell Defendants of the risk of long-term injury due to football-related concussions or that the  
10 league-mandated equipment did not protect him from such injury. This was a substantial factor in  
11 causing his current injury.

12 413. Plaintiff Tony Covington suffers from multiple past traumatic brain injuries that  
13 include but are not limited to his various problems including Short Term Memory Loss and  
14 Buzzing Sounds in his Ears.

15  
16 ANTHONY and VALERIE JONES

17 414. Plaintiff Anthony Jones was born on May 16, 1960. He is married to Valerie and has  
18 2 children ages 17 and 13. He was born in Maryland and currently lives in Meridianville,  
19 Alabama.

20 415. Plaintiff Anthony Jones played Tight End for Washington Redskins from 1984 to  
21 1988, San Diego Chargers in 1988 and Dallas Cowboys in 1989. He won Super Bowl XXII.

22 416. Plaintiff Anthony Jones suffered multiple concussions that were improperly  
23 diagnosed and improperly treated throughout his career as a professional football player in the  
24 NFL.

25 417. Plaintiff Anthony Jones was not warned by the NFL, NFL Properties, Inc., or Riddell  
26 Defendants of the risk of long-term injury due to football-related concussions or that the league-

1 mandated equipment did not protect him from such injury. This was a substantial factor in causing  
2 his current injury.

3 418. Plaintiff Anthony Jones suffers from multiple past traumatic brain injuries that  
4 include but are not limited to his various problems including Headaches and Memory Loss.

5  
6 STEVE and MARILYN REESE

7 419. Plaintiff Steve Reese was born on January 7, 1952. He is married to Marilyn. He  
8 was born in Columbus, Georgia and currently lives in Stone Mountain, Georgia.

9 420. Plaintiff Steve Reese played Line Backer for the New York Jets from 1974 to 1976,  
10 Tampa Bay Buccaneers in 1976, Minnesota Vikings in 1977 and the Cleveland Browns in 1978.

11 421. Plaintiff Steve Reese suffered multiple concussions that were improperly diagnosed  
12 and improperly treated throughout his career as a professional football player in the NFL.

13 422. Plaintiff Steve Reese was not warned by the NFL, NFL Properties, Inc., or Riddell  
14 Defendants of the risk of long-term injury due to football-related concussions or that the league-  
15 mandated equipment did not protect him from such injury. This was a substantial factor in causing  
16 his current injury.

17 423. Plaintiff Steve Reese suffers from multiple past traumatic brain injuries that include  
18 but are not limited to his various problems including Headaches, poor vision and Memory Loss.

19  
20 DONALD BESSILLIEU

21 424. Plaintiff Donald Bessillieu was born on May 4, 1956. He lives in Columbus,  
22 Georgia.

23 425. Plaintiff Donald Bessillieu played Defensive Back for the Miami Dolphins from  
24 1979 to 1982, St. Louis Cardinals in 1983, and Oakland Raiders from 1983 to 1985.

25 426. Plaintiff Donald Bessillieu suffered multiple concussions that were improperly  
26 diagnosed and improperly treated throughout his career as a professional football player in the  
27 NFL.

1 427. Plaintiff Donald Bessillieu was not warned by the NFL, NFL Properties, Inc., or  
2 Riddell Defendants of the risk of long-term injury due to football-related concussions or that the  
3 league-mandated equipment did not protect him from such injury. This was a substantial factor in  
4 causing his current injury.

5 428. Plaintiff Donald Bessillieu suffers from multiple past traumatic brain injuries that  
6 include but are not limited to his various problems including Memory Loss, Headaches and  
7 confusion.

8  
9 HAROLD L. and CAROLYN JACKSON

10 429. Plaintiff Harold Jackson was born on January 6, 1946. He is married to Carolyn. He  
11 was born in Mississippi and he currently lives in Los Angeles, California. They have one child  
12 who is 18 years old.

13 430. Plaintiff Harold Jackson played Wide Receiver for the Los Angeles Rams in 1968,  
14 the Philadelphia Eagles from 1969 to 1972, Los Angeles Rams from 1973 to 1977, New England  
15 Patriots from 1978 to 1981, Minnesota Vikings in 1982, Seattle Seahawks in 1983 and New  
16 England Patriots in 1987. He is a 5 time Pro-Bowl Selection. He led the NFL in receiving yards in  
17 1969 and 1972.

18 431. Plaintiff Harold Jackson suffered multiple concussions that were improperly  
19 diagnosed and improperly treated throughout his career as a professional football player in the  
20 NFL.

21 432. Plaintiff Harold Jackson was not warned by the NFL, NFL Properties, Inc., or  
22 Riddell Defendants of the risk of long-term injury due to football-related concussions or that the  
23 league-mandated equipment did not protect him from such injury. This was a substantial factor in  
24 causing his current injury.

25 433. Plaintiff Harold Jackson suffers from multiple past traumatic brain injuries that  
26 include but are not limited to his various problems including severe Headaches and Memory Loss.

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BRUCE and VANISHA WALKER

444. Plaintiff Bruce Walker was born on July 18, 1972. He is married to Vanisha and has one child age 9 years old. They reside in Bellflower, California.

445. Plaintiff Bruce Walker played Defensive Tackle for the New England Patriots in 1994 to 1996 and was on the squad of the San Diego Chargers from 1998 to 1999.

446. Plaintiff Bruce Walker suffered multiple concussions that were improperly diagnosed and improperly treated throughout his career as a professional football player in the NFL.

447. Plaintiff Bruce Walker was not warned by the NFL, NFL Properties, Inc., or Riddell Defendants of the risk of long-term injury due to football-related concussions or that the league-mandated equipment did not protect him from such injury. This was a substantial factor in causing his current injury.

448. Plaintiff Bruce Walker suffers from multiple past traumatic brain injuries that include but are not limited to his various problems including retaining information, Short Term Memory Loss and Headaches.

DERRICK S. "RICKY" REYNOLDS

449. Plaintiff Ricky Reynolds was born on January 19, 1965. He has 3 children ages 18, 17 and 14 years old. He lives in Dade City, Florida.

450. Plaintiff Ricky Reynolds played Defensive Back for the Tampa Bay Buccaneers from 1987 to 1993 and the New England Patriots from 1994 to 1996.

451. Plaintiff Ricky Reynolds suffered multiple concussions that were improperly diagnosed and improperly treated throughout his career as a professional football player in the NFL.

452. Plaintiff Ricky Reynolds was not warned by the NFL, NFL Properties, Inc., or Riddell Defendants of the risk of long-term injury due to football-related concussions or that the

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1 league-mandated equipment did not protect him from such injury. This was a substantial factor in  
2 causing his current injury.

3 453. Plaintiff Ricky Reynolds suffers from multiple past traumatic brain injuries that  
4 include but are not limited to his various problems including Short Term Memory Loss, Dizziness  
5 and Ringing in his ears.

6  
7 **DAVID and BONNIE LEWIS**

8 454. Plaintiff David Lewis was born on October 15, 1952. He is married to Bonnie and  
9 has one child age 23 years old. They reside in Dover, Florida.

10 455. Plaintiff David Lewis played Line Backer for the Tampa Bay Buccaneers from 1977  
11 to 1982, San Diego Chargers from 1982 to 1983 and Los Angeles Rams from 1983 to 1984.

12 456. Plaintiff David Lewis suffered multiple concussions that were improperly diagnosed  
13 and improperly treated throughout his career as a professional football player in the NFL.

14 457. Plaintiff David Lewis was not warned by the NFL, NFL Properties, Inc., or Riddell  
15 Defendants of the risk of long-term injury due to football-related concussions or that the league-  
16 mandated equipment did not protect him from such injury. This was a substantial factor in causing  
17 his current injury.

18 458. Plaintiff David Lewis suffers from multiple past traumatic brain injuries that include  
19 but are not limited to his various problems including Memory Loss and Headaches.

20  
21 **RONNIE and SHERYL LIPPETT**

22 459. Plaintiff Ronnie Lippett was born on December 10, 1960. He was born in Florida.  
23 He is married to Sheryl and has 3 children. They reside in South Easton, Massachusetts.

24 460. Plaintiff Ronnie Lippett played Defensive Back for the New England Patriots from  
25 1983 to 1991. He was selected to the New England Patriots all 1980's team.

1 461. Plaintiff Ronnie Lippett suffered multiple concussions that were improperly  
2 diagnosed and improperly treated throughout his career as a professional football player in the  
3 NFL.

4 462. Plaintiff Ronnie Lippett was not warned by the NFL, NFL Properties, Inc., or Riddell  
5 Defendants of the risk of long-term injury due to football-related concussions or that the league-  
6 mandated equipment did not protect him from such injury. This was a substantial factor in causing  
7 his current injury.

8 463. Plaintiff Ronnie Lippett suffers from multiple past traumatic brain injuries that  
9 include but are not limited to his various problems including Memory Loss, Depression, Sleep  
10 problems and Post Traumatic Stress Disorder.

11  
12 ROLAND and CARMEL JAMES

13 464. Plaintiff Roland James was born on February 18, 1958. He was born in Ohio. He is  
14 married to Carmel and has 4 children. They reside in Sharon, Massachusetts.

15 465. Plaintiff Roland James played Defensive Back for the New England Patriots from  
16 1980 to 1990. He was selected to the New England Patriots all 1980's team.

17 466. Plaintiff Roland James suffered multiple concussions that were improperly diagnosed  
18 and improperly treated throughout his career as a professional football player in the NFL.

19 467. Plaintiff Roland James was not warned by the NFL, NFL Properties, Inc., or Riddell  
20 Defendants of the risk of long-term injury due to football-related concussions or that the league-  
21 mandated equipment did not protect him from such injury. This was a substantial factor in causing  
22 his current injury.

23 468. Plaintiff Roland James suffers from multiple past traumatic brain injuries that include  
24 but are not limited to his various problems including Memory Loss, Depression and Sleep  
25 problems.

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27  
28 MARK S. JUPER

1 469. Plaintiff Mark S. Duper was born on January 25, 1959. He lives in Margate, Florida.  
2 He has five children, and two of them are ages 15 and 16 years old.

3 470. Plaintiff Mark S. Duper played Wide Receiver for the Miami Dolphins from 1982 to  
4 1992. He was selected to the Pro-Bowl three times. He was inducted into the Miami Dolphins  
5 Honor Roll.

6 471. Plaintiff Mark S. Duper suffered multiple concussions that were improperly  
7 diagnosed and improperly treated throughout his career as a professional football player in the  
8 NFL.

9 472. Plaintiff Mark S. Duper was not warned by the NFL, NFL Properties, Inc., or Riddell  
10 Defendants of the risk of long-term injury due to football-related concussions or that the league-  
11 mandated equipment did not protect him from such injury. This was a substantial factor in causing  
12 his current injury.

13 473. Plaintiff Mark S. Duper suffers from multiple past traumatic brain injuries that  
14 include but are not limited to his various problems including memory loss and headaches.

15  
16 BRIAN and SARCA INGRAM

17 474. Plaintiff Brian Ingram was born on October 31, 1959. He was born in Memphis,  
18 Tennessee. He is married to Sarca and they have 5 children. They reside in Stone Mountain,  
19 Georgia.

20 475. Plaintiff Brian Ingram played Line Backer for the New England Patriots from 1982  
21 to 1986 and the San Diego Chargers from 1987 to 1988.

22 476. Plaintiff Brian Ingram suffered multiple concussions that were improperly diagnosed  
23 and improperly treated throughout his career as a professional football player in the NFL.

24 477. Plaintiff Brian Ingram was not warned by the NFL, NFL Properties, Inc., or Riddell  
25 Defendants of the risk of long-term injury due to football-related concussions or that the league-  
26 mandated equipment did not protect him from such injury. This was a substantial factor in causing  
27 his current injury.

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1 478. Plaintiff Brian Ingram suffers from multiple past traumatic brain injuries that include  
2 but are not limited to his various problems including Short Term Memory Loss, Headaches and  
3 Ringing in his ears.

4  
5 ANTHONY "TONY" and TRUDY COLLINS

6 479. Plaintiff Tony Collins was born on May 27, 1959. He is married to Trudy and has  
7 eight children of which two of them are minors ages 15 and 13 years old. They reside in  
8 Winterville, North Carolina.

9 480. Plaintiff Tony Collins played Running Back for the New England Patriots from 1981  
10 to 1989 and the Miami Dolphins in 1990. He was selected to the Pro Bowl in 1983.

11 481. Plaintiff Tony Collins suffered multiple concussions that were improperly diagnosed  
12 and improperly treated throughout his career as a professional football player in the NFL.

13 482. Plaintiff Tony Collins was not warned by the NFL, NFL Properties, Inc., or Riddell  
14 Defendants of the risk of long-term injury due to football-related concussions or that the league-  
15 mandated equipment did not protect him from such injury. This was a substantial factor in causing  
16 his current injury.

17 483. Plaintiff Tony Collins suffers from multiple past traumatic brain injuries that include  
18 but are not limited to his various problems including Memory Loss and Sleeping problems.

19  
20 STEVE and ANGELA NELSON

21 484. Plaintiff Steve Nelson was born on April 26, 1951. He was born in Farmington,  
22 Minnesota. He is married to Angela and has 5 children, with one of them is 5 years old. They  
23 reside in Middleboro, Massachusetts.

24 485. Plaintiff Steve Nelson played Line Backer for the New England Patriots from 1974 to  
25 1987. He was selected to the Pro Bowl three times. His jersey was retired by the New England  
26 Patriots.

1 486. Plaintiff Steve Nelson suffered multiple concussions that were improperly diagnosed  
2 and improperly treated throughout his career as a professional football player in the NFL.

3 487. Plaintiff Steve Nelson was not warned by the NFL, NFL Properties, Inc., or Riddell  
4 Defendants of the risk of long-term injury due to football-related concussions or that the league-  
5 mandated equipment did not protect him from such injury. This was a substantial factor in causing  
6 his current injury.

7 488. Plaintiff Steve Nelson suffers from multiple past traumatic brain injuries that include  
8 but are not limited to his various problems including Short Term Memory Loss, Headaches, vision  
9 problems, sleep problems, depression and anxiety attacks.

10  
11 JAMES E. and SHALANE WILLIS

12 489. Plaintiff James E. Willis was born on September 2, 1972. He is married to Shalane  
13 and has 3 children ages 15, 10 and 3 years old. They reside in Huntsville, Alabama.

14 490. Plaintiff James E. Willis played Line Backer for the Green Bay Packers from 1993 to  
15 1996, Philadelphia Eagles from 1996 to 1999 and Seattle Seahawks in 2000.

16 491. Plaintiff James E. Willis suffered multiple concussions that were improperly  
17 diagnosed and improperly treated throughout his career as a professional football player in the  
18 NFL.

19 492. Plaintiff James E. Willis was not warned by the NFL, NFL Properties, Inc., or  
20 Riddell Defendants of the risk of long-term injury due to football-related concussions or that the  
21 league-mandated equipment did not protect him from such injury. This was a substantial factor in  
22 causing his current injury.

23 493. Plaintiff James E. Willis suffers from multiple past traumatic brain injuries that  
24 include but are not limited to his various problems including Short Term Memory Loss,  
25 Headaches, and vision problems.

26  
27 ANTHONY and PAULA HANCOCK

1 494. Plaintiff Anthony Hancock was born on June 10, 1960. He was born in Cleveland,  
2 Ohio. He is married to Paula and they have 2-children. They currently reside in Knoxville,  
3 Tennessee.

4 495. Plaintiff Anthony Hancock played Wide Receiver for the Kansas City Chiefs from  
5 1982 to 1988.

6 496. Plaintiff Anthony Hancock suffered multiple concussions that were improperly  
7 diagnosed and improperly treated throughout his career as a professional football player in the  
8 NFL.

9 497. Plaintiff Anthony Hancock was not warned by the NFL, NFL Properties, Inc., or  
10 Riddell Defendants of the risk of long-term injury due to football-related concussions or that the  
11 league-mandated equipment did not protect him from such injury. This was a substantial factor in  
12 causing his current injury.

13 498. Plaintiff Anthony Hancock suffers from multiple past traumatic brain injuries that  
14 include but are not limited to his various problems including Short Term Memory Loss and  
15 Headaches.

16  
17 JEFF BURRIS

18 499. Plaintiff Jeff Burris was born on June 7, 1972. He was born in Rock Hill, South  
19 Carolina. He has 2 children ages 13 and 11 years old. He currently resides in Indianapolis,  
20 Indiana.

21 500. Plaintiff Jeff Burris played Defensive Back for the Buffalo Bills from 1994 to 1997,  
22 Indianapolis Colts from 1998 to 2001 and Cincinnati Bengals from 2002 to 2003.

23 501. Plaintiff Jeff Burris suffered multiple concussions that were improperly diagnosed  
24 and improperly treated throughout his career as a professional football player in the NFL.

25 502. Plaintiff Jeff Burris was not warned by the NFL, NFL Properties, Inc., or Riddell  
26 Defendants of the risk of long-term injury due to football-related concussions or that the league-

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1 mandated equipment did not protect him from such injury. This was a substantial factor in causing  
2 his current injury.

3 503. Plaintiff Jeff Burris suffers from multiple past traumatic brain injuries that include  
4 but are not limited to his various problems including Memory Loss, Depression, Headaches and  
5 difficulty speaking.  
6

7 WILLIAM C. "BILL" AND SUSAN BRADLEY

8 504. Plaintiff Bill Bradley was born on January 24, 1947. He is married to Susan and they  
9 reside in Spring Ranch, Texas.

10 505. Plaintiff Bill Bradley played Free Safety for the Philadelphia Eagles from 1969 to  
11 1976 and the St. Louis Cardinals in 1977. He was a 3 time Pro Bowl selection. In 1971 and 1972,  
12 he led the NFL in interceptions.

13 506. Plaintiff Bill Bradley suffered multiple concussions that were improperly diagnosed  
14 and improperly treated throughout his career as a professional football player in the NFL.

15 507. Plaintiff Bill Bradley was not warned by the NFL, NFL Properties, Inc., or Riddell  
16 Defendants of the risk of long-term injury due to football-related concussions or that the league-  
17 mandated equipment did not protect him from such injury. This was a substantial factor in causing  
18 his current injury.

19 508. Plaintiff Bill Bradley suffers from multiple past traumatic brain injuries that include  
20 but are not limited to his various problems including Memory Loss and Headaches.  
21

22 KERRY and TANJA GOODE

23 509. Plaintiff Kerry Goode was born on July 28, 1965. He is married to Tanja and they  
24 have 4 children ages 16, 14, 11 and 6 years old. They reside in Fairburn, Georgia.

25 510. Plaintiff Kerry Goode played Running Back for the Tampa Bay Buccaneers in 1988  
26 and the Miami Dolphins in 1989.  
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1 511. Plaintiff Kerry Goode suffered multiple concussions that were improperly diagnosed  
2 and improperly treated throughout his career as a professional football player in the NFL.

3 512. Plaintiff Kerry Goode was not warned by the NFL, NFL Properties, Inc., or Riddell  
4 Defendants of the risk of long-term injury due to football-related concussions or that the league-  
5 mandated equipment did not protect him from such injury. This was a substantial factor in causing  
6 his current injury.

7 513. Plaintiff Kerry Goode suffers from multiple past traumatic brain injuries that include  
8 but are not limited to his various problems including frequent Headaches and blurred vision.

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10 RAYMOND and KIMBERLEY CLAYBORN

11 514. Plaintiff Raymond Clayborn was born on January 2, 1955. He is married to  
12 Kimberley and they have 3 children ages 25, 15, and 12 years old. They reside in Katy, Texas.

13 515. Plaintiff Raymond Clayborn played Defensive Back for the New England Patriots  
14 from 1977 to 1989 and Cleveland Browns from 1990 to 1991. He was selected to the Pro-Bowl 3  
15 times. He is a memo

16 516. Plaintiff Raymond Clayborn suffered multiple concussions that were improperly  
17 diagnosed and improperly treated throughout his career as a professional football player in the  
18 NFL.

19 517. Plaintiff Raymond Clayborn was not warned by the NFL, NFL Properties, Inc., or  
20 Riddell Defendants of the risk of long-term injury due to football-related concussions or that the  
21 league-mandated equipment did not protect him from such injury. This was a substantial factor in  
22 causing his current injury.

23 518. Plaintiff Raymond Clayborn suffers from multiple past traumatic brain injuries that  
24 include but are not limited to his various problems including Short Term Memory Loss, headaches,  
25 buzzing in his ears, and sleep problems.

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STEVEN and SUSAN ZABEL

519. Plaintiff Steven Zabel was born on March 20, 1948. He is married to Susan and they have 3 children. They reside in Edmond, Oklahoma:

520. Plaintiff Steven Zabel played Line Backer for the New England Patriots from 1970 to 1974, New England Patriots from 1975 to 1978 and Baltimore Colts in 1979.

521. Plaintiff Steven Zabel suffered multiple concussions that were improperly diagnosed and improperly treated throughout his career as a professional football player in the NFL.

522. Plaintiff Steven Zabel was not warned by the NFL, NFL Properties, Inc., or Riddell Defendants of the risk of long-term injury due to football-related concussions or that the league-mandated equipment did not protect him from such injury. This was a substantial factor in causing his current injury.

523. Plaintiff Steven Zabel suffers from multiple past traumatic brain injuries that include but are not limited to his various problems including frequent pain in his head, sleeping difficulties and memory loss.

FIRST CAUSE OF ACTION

NEGLIGENCE- Monopolist

(As Against the NFL)

524. Plaintiffs incorporate by reference paragraphs 1 through 523 as if fully set forth herein at length.

525. The NFL, by and through its monopoly power, has historically had a duty to invoke rules that protect the health and safety of its players and the public. Nevertheless, by its actions, it has violated California Business and Professional Code Section 17001 by engaging in practices that restrain the development of good science on the problem and epidemic of concussion injuries.

526. As a monopoly, the NFL has a duty to protect the health and safety of its players, as well as the public at large.

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1 527. Throughout the history of the NFL, the NFL organization has consistently breached  
2 its duty to protect the health and safety of its players by failing to enact rules, policies and  
3 regulations to best protect its players.

4 528. The NFL breached its duty to its players, including Plaintiffs, to use ordinary care to  
5 protect the physical and mental health of players by failing to implement standardized post-  
6 concussion guidelines by failing to enact rules to decrease the risk of concussions during games or  
7 practices, and by failing to implement mandatory rules that would prevent a player who suffered a  
8 mild traumatic brain injury from re-entering a football game and being placed at further risk of  
9 injury.

10 529. Throughout its many years, the NFL has repeatedly established its duty to protect the  
11 health and safety of its players when known and foreseeable risk exists. Until August 14, 2007, the  
12 NFL failed to create and implement league-wide guidelines concerning the treatment and  
13 monitoring of players who suffer concussive brain injuries.

14 530. It has been well established since 1928 that repeated blows to the head can lead to  
15 CTE, commonly known as "punch drunk syndrome." Punch Drunk Syndrome has been prevalent  
16 in boxers who have repeatedly suffered concussions.

17 531. Despite the fact that other sporting associations exist, such as the National Hockey  
18 League and the World Boxing Association, which have decades ago established standardized  
19 association-wide concussion management rules, until August 14, 2007, the NFL failed to establish  
20 any guidelines or policies to protect the mental health and safety of its players.

21 532. Nonetheless, it took the NFL until June of 2010 to finally acknowledge the long-term  
22 risks associated with concussions, including dementia, memory loss, CTE and its related  
23 symptoms. At that time, the NFL warned active players of those risks. To date, the NFL has never  
24 warned any past players, including Plaintiffs, or the public of the long-term brain injury caused  
25 from concussions.

26 533. The NFL's failure to fulfill its duty to protect its players, the plaintiffs and the public,  
27 include, but are not limited to, the following failures:

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- (a) Failure to institute acclimation requirements or procedures to ensure proper acclimation of the NFL players before they participate in practices or games;
- (b) Failure to regulate and monitor practices, games, equipment, and medical care so as to minimize the long-term risks associated with concussive brain injuries suffered by the NFL players, including Plaintiffs;
- (c) Failure to require that an adequate concussive brain injury history be taken of NFL players;
- (d) Failure to ensure accurate diagnosis and recording of concussive brain injury so the condition can be treated in an adequate and timely manner;
- (e) Failure to invoke league-wide guidelines, policies, and procedures regarding the identification and treatment of concussive brain injury, and the return to play insofar as such matters pertain to concussive brain injury;
- (f) Failure to properly inform the public and other American Rules Football leagues and players of the health risks associated with concussive injury;
- (g) Failure to license and approve the best equipment available that will reduce the risk of concussive brain injury; and
- (h) Failure to warn of the harm of repetitive concussion injuries.

534. The NFL breached its duty to protect the health and safety of its players by subjecting NFL players to an increased risk of concussive brain injury.

535. The NFL failed to provide complete, current, and competent information and directions to NFL athletic trainers, physicians, and coaches regarding concussive brain injuries and its prevention, symptoms, and treatment.

536. If the NFL would have taken the necessary steps to oversee and protect the NFL players, including Plaintiffs, by developing and implementing necessary guidelines, policies, and procedures; providing reasonably safe helmets; and educating and training all persons involved



1 with the NFL Teams in the recognition, prevention, and treatment of concussive brain injuries, then  
2 NFL players, such as Plaintiffs, would not have suffered from the subject condition or the effects  
3 of that condition, would have recovered more rapidly, or would not have suffered long-term brain  
4 injuries.

5 537. Under all of the above circumstances, it was foreseeable that the NFL's violating its  
6 duties would cause or substantially contribute to the personal injuries suffered by Plaintiffs.

7 538. The NFL committed acts of omission and commission, which collectively and  
8 severally, constituted negligence. The NFL's negligence was a proximate and producing cause of  
9 the personal injuries and other damages suffered by Plaintiffs.

10 539. As a result of the personal injuries, Plaintiffs are entitled to damages, as alleged  
11 herein or allowed by law from the NFL in an amount reasonably anticipated to exceed the  
12 jurisdictional minimum of \$25,000.

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14 **SECOND CAUSE OF ACTION:**

15 **NEGLIGENCE**

16 **(As Against the NFL)**

17 540. Plaintiffs incorporate by reference paragraphs 1 through 539 of this Complaint as if  
18 fully set forth herein at length.

19 541. The NFL has historically assumed an independent tort duty to invoke rules that  
20 protect the health and safety of its players, but it has violated Section 323 of the Restatement  
21 (Second) of Torts as adopted by the Courts in California.

22 542. Throughout the history of the NFL, the NFL organization has consistently exercised  
23 its duty to protect the health and safety of its players by implementing rules, policies and  
24 regulations in an attempt to best protect its players.

25 543. By enacting rules to protect the health and safety of its players, the NFL has  
26 repeatedly confirmed its duty to take reasonable and prudent actions to protect the health and safety  
27 of its players when known and foreseeable risks exist.

1 544. The NFL breached its duty to its players, including Plaintiffs, to use ordinary care to  
2 protect the physical and mental health of players by implementing standardized post-concussion  
3 guidelines and by failing to implement mandatory rules that would prevent a player who suffered a  
4 mild traumatic brain injury from re-entering a football game or practice.

5 545. Throughout the many years that the NFL has repeatedly established its duty to  
6 protect the health and safety of its players when known and foreseeable risks exist, until August 14,  
7 2007, the NFL failed to create and implement league-wide guidelines concerning the treatment and  
8 monitoring of players who suffer a concussive brain injury during a game.

9 546. It has been well established since 1928 that repeated blows to the head can lead to  
10 CTE, commonly known as "punch drunk syndrome." Punch Drunk Syndrome has been prevalent  
11 in boxers who have repeatedly suffered concussions.

12 547. Despite the fact that other sporting associations exist, such as the World Boxing  
13 Association, which have decades ago established standardized association-wide concussion  
14 management rules, until August 14, 2007, the NFL failed to establish any guidelines or policies to  
15 protect the mental health and safety of its players.

16 548. The NFL's failure to fulfill its assumed duty to protect its players includes but is not  
17 limited to the following failures:

- 18 (a) Failure to institute acclimation requirements or procedures to ensure proper  
19 acclimation of the NFL players before they participate in practices or games;
- 20 (b) Failure to regulate and monitor practices, games, rules, equipment, and medical care  
21 so as to minimize the long-term risks associated with concussive brain injuries  
22 suffered by the NFL players, including Plaintiffs;
- 23 (c) Failure to require that an adequate concussive brain injury history be taken of NFL  
24 players;
- 25 (d) Failure to ensure accurate diagnosis and recording of concussive brain injury so the  
26 condition can be treated in an adequate and timely manner;
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- 1 (e) Failure to invoke league-wide guidelines, policies, and procedures regarding the
- 2 identification and treatment of concussive brain injury, and the return to play insofar
- 3 as such matters pertain to concussive brain injury; and,
- 4 (f) Failure to license and approve the best equipment available that will reduce the risk
- 5 of concussive brain injury.

6 549. The NFL breached its assumed duty to protect the health and safety of its players by  
7 subjecting NFL players to an increased risk of concussive brain injury.

8 550. The NFL failed to provide complete, current, and competent information and  
9 directions to NFL athletic trainers, physicians, and coaches regarding concussive brain injuries and  
10 its prevention, symptoms, and treatment.

11 551. If the NFL would have taken the necessary steps to oversee and protect the NFL  
12 players, including Plaintiffs, by developing and implementing necessary guidelines, policies, and  
13 procedures; providing reasonably safe helmets; and educating and training all persons involved  
14 with the NFL Teams in the recognition, prevention, and treatment of concussive brain injuries, then  
15 NFL players, such as Plaintiffs, would not have suffered from the subject condition or the effects  
16 of that condition, would have recovered more rapidly, or would not have suffered long-term brain  
17 damage, dementia, and depression related to dementia and CTE.

18 552. Under all of the above circumstances, it was foreseeable that the NFL's violations of  
19 its duties would cause or substantially contribute to the personal injuries suffered by the Plaintiffs.

20 553. The NFL committed acts of omission and commission, which collectively and  
21 severally, constituted negligence. The NFL's negligence was a proximate and producing cause of  
22 the personal injuries and other damages suffered by Plaintiff.

23 554. As a result of the personal injuries of Plaintiffs, they are entitled to damages, as  
24 alleged herein or allowed by law, from the NFL in an amount reasonably anticipated to exceed the  
25 jurisdictional minimum of \$25,000.

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**THIRD CAUSE OF ACTION:**

**FRAUD**

**(As Against the NFL)**

555. Plaintiffs incorporate by reference paragraphs 1 through 554 of this Complaint as if fully set forth herein at length.

556. From 2005 through June of 2010, the NFL made through its "Mild Traumatic Brain Injury Committee" and others, its agents, material misrepresentations to its players, former players, the Congress and the public at large that there was no link between concussions and later life cognitive/brain injury, including CTE and its related symptoms.

557. The persons who made the misrepresentations as agents of the NFL and the NFL knew they were false.

558. The persons who made the misrepresentations as agents of the NFL and the NFL intended to defraud, among others, the Plaintiffs in this action.

559. The Plaintiffs, among others, justifiably relied on these misrepresentations to their detriment in getting care for their injuries.

560. The Plaintiffs, among others, were damaged by these misrepresentations. Among other things, they require increased home care, loss of consortium, loss of employment, medical costs and pain and suffering.

561. As a result of the personal injuries of Plaintiffs, they are entitled to damages, as alleged herein or allowed by law, from the NFL in an amount reasonably anticipated to exceed the jurisdictional minimum of \$25,000.

**FOURTH CAUSE OF ACTION**

**NEGLIGENCE**

**(As Against NFL Properties)**

562. Plaintiffs incorporate by reference paragraphs 1 through 561 as if fully set forth herein at length.

1 563. NFL Properties breached its duty to ensure that the equipment it licensed and  
2 approved were of the highest possible quality and sufficient to protect the NFL players, including  
3 Plaintiffs, from the risk of concussive brain injuries.

4 564. NFL Properties breached its duty by licensing the Riddell Defendants' helmets, and  
5 approving and/or requiring the use of the helmets for the NFL players, knowing or having reason to  
6 know that the helmets were negligently and defectively designed and/or manufactured.

7 565. As a result of these breaches by NFL Properties, Plaintiffs suffer personal injuries as  
8 a result the long-term health effects of concussive brain injuries.

9 566. As a result of the personal injuries of Plaintiffs, Plaintiffs are entitled to damages  
10 from NFL Properties, LLC in an amount reasonably anticipated to exceed the jurisdictional  
11 minimum of \$25,000.00.

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13 **FIFTH CAUSE OF ACTION**  
14 **STRICT LIABILITY FOR DESIGN DEFECT**  
15 **(As Against Riddell Defendants)**

16 567. Plaintiffs incorporate by reference paragraphs 1 through 566 as if set fully herein at  
17 length.

18 568. At the time the helmets were designed, manufactured, sold, and distributed by the  
19 Riddell Defendants, the helmets were defective in design, unreasonably dangerous, and unsafe for  
20 their intended purpose because they did not provide adequate protection against the foreseeable  
21 risk of concussive brain injury. The design defect includes, but is not limited to the following:

- 22 (a) Negligently failing to design the subject helmet with a safe means  
23 of attenuating and absorbing the foreseeable forces of impact in  
24 order to minimize and/or reduce the forces and energy directed to  
25 the player's head;
- 26 (b) Negligently designing the subject helmet with a shock attenuating  
27 system which was not safety configured.

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- 1 (c) Negligently failing to properly and adequately test the helmet  
2 model;  
3 (d) Other acts of negligence that may be discovered during the course  
4 of this matter, and  
5 (e) Failing to warn Plaintiffs that their helmets would not protect  
6 against the long-term health consequences of concussive brain injury.

7 569. The defective design and unreasonably dangerous condition were a proximate and  
8 producing cause of the personal injuries suffered by the Plaintiffs and other damages, including but  
9 not limited to, economic damages and non-economic damages.

10 570. The Riddell Defendants are strictly liable for designing a defective and unreasonably  
11 dangerous product and for failing to warn which were proximate and producing causes of the  
12 personal injuries and other damages including, but not limited to, economic damage as alleged  
13 herein. A safer alternative design was economically and technologically feasible at the time the  
14 product left the control of the Riddell Defendants.

15 571. As a result of the personal injuries of Plaintiffs, Plaintiffs are entitled to damages  
16 from Riddell Defendants in an amount reasonably anticipated to exceed the jurisdictional minimum  
17 of \$25,000.00.

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19 **SIXTH CAUSE OF ACTION**  
20 **(STRICT LIABILITY FOR MANUFACTURING DEFECT)**  
21 **(As Against Riddell Defendants)**

22 572. Plaintiffs incorporate by reference paragraphs 1 through 571 as if set forth herein at  
23 length.

24 573. At the time the helmets were designed, manufactured, sold and distributed by the  
25 Riddell Defendants, the helmets were defective in their manufacturing and unreasonably dangerous  
26 and unsafe for their intended purpose because they did not provide adequate protection against the  
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1 foreseeable risk of concussive brain injury. The Riddell Defendants' failure to design the helmets  
2 to design and manufacturing specifications resulted in, among other things, the following:

- 3 (a) Negligently failing to manufacture the subject helmet with a  
4 safe means of attenuating and absorbing the foreseeable forces  
5 of impact in order to minimize and/or reduce the forces and  
6 energy directed to the player's head;
- 7 (b) Negligently manufacturing the subject helmet with a shock  
8 attenuating system which was not safely configured;
- 9 (c) Negligently failing to properly and adequately inspect and/or test  
10 the helmet model;
- 11 (d) Other acts of negligence that may be discovered during the course  
12 of this matter; and
- 13 (e) Failure to warn Plaintiffs that its helmets wouldn't protect against  
14 concussive brain injury.
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16 574. The manufacturing defect was a proximate and producing cause of the personal  
17 injuries suffered by Plaintiffs and other damages, including but not limited to, economic damages  
18 and non-economic damages.

19 575. The Riddell Defendants are strictly liable for manufacturing and placing in the stream  
20 of commerce a defective and unreasonably dangerous product which was a proximate and  
21 producing cause of the personal injuries and other damages, including but not limited to, economic  
22 damages and non-economic damages. A safe alternative design was economically and  
23 technologically feasible at the time the product left the control of the Riddell Defendants.

24 576. As a result of the personal injuries of Plaintiffs, Plaintiffs are entitled to damages  
25 from Riddell Defendants in an amount reasonably anticipated to exceed the jurisdictional minimum  
26 of \$25,000.00.

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11/15/78

1 SEVENTH CAUSE OF ACTION

2 FAILURE TO WARN

3 (As Against Riddell Defendants)

4 577. Plaintiffs incorporate by reference paragraphs 1 through 576 as if set forth herein at  
5 length.

6 578. The Riddell Defendants failed to provide necessary and adequate safety and  
7 instructional materials and warnings of the risk and means available to reduce and/or minimize the  
8 risk of concussive brain injuries while playing football.

9 579. The Riddell Defendants failed to provide necessary and adequate information,  
10 warnings, and/or instructional materials regarding the fact that other model helmets provided  
11 greater shock attenuation from blows to the head area.

12 580. The Riddell Defendants' failure to warn caused the Plaintiffs' personal injuries.

13 581. As a result of the personal injuries of Plaintiffs, Plaintiffs are entitled to damages  
14 from the Riddell Defendants, in an amount reasonably anticipated to exceed the jurisdictional  
15 minimum of \$25,000.00.

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17 EIGHTH CAUSE OF ACTION

18 NEGLIGENCE

19 (As Against Riddell Defendants)

20 582. Plaintiffs incorporate by reference paragraphs 1 through 581 as if set forth herein at  
21 length.

22 583. The Riddell Defendants should have been well aware that since 1928 repeated blows  
23 to the head can lead to CTE, commonly known as "punch-drunk syndrome".

24 584. The Riddell Defendants breached their duty of reasonable care by failing to provide  
25 necessary and adequate safety and instructional materials and warnings of the risk and means  
26 available to reduce and/or minimize the risk of concussive brain injuries while playing football  
27 using their helmets.

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1 585. As a result of the Riddell Defendants' breach of duty, Plaintiffs have sustained  
2 permanent injury.

3 586. For the personal injuries of Plaintiffs, Plaintiffs are entitled to damages from the  
4 Riddell Defendants in an amount reasonably anticipated to exceed the jurisdictional minimum of  
5 \$25,000.00.

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7 NINTH CAUSE OF ACTION

8 LOSS OF CONSORTIUM

9 (As Against All Defendants)

10 587. Plaintiffs incorporate by reference paragraphs 1 through 586 as if set forth herein at  
11 length.

12 588. As a direct and proximate result of the carelessness, negligence and recklessness of  
13 all Defendants and of the aforesaid injuries to their husbands, the wife Plaintiffs have been  
14 damaged as follows:

- 15 a. They have been and will continue to be deprived of the services,  
16 society and companionship of their husbands;  
17 b. They have been and will continue to be required to spend money  
18 for medical care and household care for the treatment of their  
19 husbands; and  
20 c. They have been and will continue to be deprived of the earnings of  
21 their husbands.

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23 589. As a result of the injuries to Plaintiffs, wife Plaintiffs are entitled to damages from  
24 the Defendants, in an amount reasonably anticipated to exceed the jurisdictional minimum of  
25 \$25,000.00.

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PRAYER FOR RELIEF

WHEREFORE, Plaintiffs pray for judgment against Defendants, and each of them, as follows:

1. For compensatory and general damages according to proof;
2. For special and incidental damages according to proof;
3. For punitive damages according to proof;
4. For costs of the proceedings herein; and
5. For all such other and further relief as the Court deems just.

DATED: July 19, 2011

GIRARDI | KEESE

BY: 

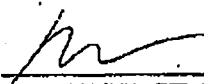
THOMAS V. GIRARDI  
Attorney for Plaintiffs

JURY DEMAND

Plaintiffs hereby demand a trial by jury on all claims so triable.

DATED: July 19, 2011

GIRARDI | KEESE

BY: 

THOMAS V. GIRARDI  
Attorney for Plaintiffs

11/16/11 7:28