

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

**JAMAL ANDERSON; KARSTEN)
BAILEY and CHRISTIE BAILEY, his)
wife; FRED BANKS; TERRY P.)
BEASLEY and MARLENE BEASLEY, his)
wife; GUY R. BINGHAM and SHARON)
BINGHAM, his wife; ANTHONY)
BLAYLOCK; DAVID S. BRANDON and)
ZONDRA BRANDON, his wife;)
TIMOTHY W. BROADY; STEVEN)
BROUSSARD; CURTIS BROWN; KEITH)
BROWNER; ROSS BROWNER and)
SHAYLA BROWNER, his wife; JEFFERY)
BRYANT; WARREN BRYANT; DANIEL)
BUGGS and ANGELA BUGGS, his wife;)
JOE BURNS and TIFFANY BURNS, his)
wife; RAYMOND L. BUTLER; WILLIAM)
CARR; ALPHONSO CARREKER and)
KIMBERLY B. CARREKER, his wife;)
TRAVIS CARROLL; LAVONYA)
CARTER; JOHNDALE E. CARTY and)
LATONIA CARTY, his wife; ROBERT)
CHANCEY and LaSHAWNZA)
CHANCEY, his wife; HERBERT)
CHRISTOPHER and BESSIE)
CHRISTOPHER, his wife; STEPHEN)
CLARK and CHARL CLARK, his wife;)
FELIPE CLAYBROOKS; COSEY)
COLEMAN and RERNITVAL)
COLEMAN, his wife; RODERICK)
COLEMAN and SEQUOIA COLEMAN,)
his wife; CALVIN COLLINS and)
FELISHA COLLINS, his wife; ROBERT)
THOMAS COOKSEY and CYNTHIA A.)
COOKSEY, his wife; DEKE COOPER and)**

**GWEN COOPER, his wife; DANNY)
LAMAR COPELAND and JO ANN)
COPELAND, his wife; MICHAEL A.)
CURCIO; MITCHELL L. DAVIS;)
WALLACE DAVIS and ANN H. DAVIS,)
his wife; CURTIS R. DICKEY and)
DEANNA DICKEY, his wife; FLOYD)
DIXON and KATRINA DIXON, his wife; J.)
CHRISTOPHER DOLEMAN; ERIC)
DORSEY; JAMIE R. DUNCAN; MARC)
EDWARDS and DARSI EDWARDS, his)
wife; MELVIN FARR, JR.; MICHAEL)
FARR and CYNTHIA FARR, his wife;)
ELLIOTT FORTUNE; JAMES)
GEATHERS; VICTOR GREEN and)
ESTHER GREEN, his wife; D. KRIS)
HAINES and MARY ANN HAINES, his)
wife; RUFFIN HAMILTON and DENA)
HAMILTON, his wife; TERRY HARDY)
and LAKESHA HARDY, his wife; DURIEL)
HARRIS and JULIE HARRIS, his wife;)
GARRISON HEARST; EFREM HILL and)
TIYA HILL, his wife; STEPHEN HOBBS)
and DEE HOBBS, his wife; KELLY)
HOLCOMB and LORIE HOLCOMB, his)
wife; RODNEY HOLMAN and SANDRA)
HOLMAN, his wife; BRUCE B. HOLMES;)
SEDRICK IRVIN; CHRIS JACKE;)
ALFRED JENKINS; ANTHONY)
JOHNSON; LARRY JOHNSON, SR. and)
CATHY JOHNSON, his wife; SIDNEY)
JOHNSON and CATRICE JOHNSON, his)
wife; JOSEPH BRIAN JOHNSTON and)
MES JOHNSTON, his wife; ROBERT J.)
KELLY, III and EMILY KELLY, his wife;)
ALLAN KENNEDY; ED KING and)**

ANGELA GWEN KING, his wife; JEVON)
LANGFORD and JAYNA LANGFORD,)
his wife; ROBERT L. LAVETTE, JR.;)
KEVIN LEE and NICOLE LEE, his wife;)
STEVE LUKE and LORI LUKE, his wife;)
DON MAJKOWSKI and KELLY)
MAJKOWSKI, his wife; DEWEY)
McCLAIN and LINDA McClAIN, his wife;)
DANA McLEMORE and KARYN)
McLEMORE, his wife; ROBERT A.)
MICHO; JERMAINE MILES and)
CASSANDRA MILES, his wife; CALVIN)
MILLER and DEE MILLER, his wife;)
SHANNON L. MITCHELL and)
FRENCHIE MITCHELL, his wife;)
STEVON MOORE and JONDENA)
MOORE, his wife; ZEKE MOWATT;)
HUBERT OLIVER and ROSALYN)
WADE, his wife; BRIAN O'NEAL;)
STERLING PALMER; ROOSEVELT)
PATTERSON and KIKI G. PATTERSON,)
his wife; BRETT PERRIMAN and)
LAUNDRIA PERRIMAN, his wife; KEITH)
PONDER and JANET PONDER, his wife;)
STANLEY PRITCHETT, JR.; WESLEY)
PRITCHETT; GARY REASONS and)
TERRI REASONS, his wife; KENNETH)
REAVES; ALPETTE RICHARDSON;)
ROBERT L. ROBERTSON, JR. and)
NNEKA ROBERTSON, his wife; JIM)
ROMANO and BRIGITTE ROMANO, his)
wife; JOHNNY RUTLEDGE and GIA)
RUTLEDGE, his wife; O.J. SANTIAGO;)
JOHN W. SAWYER; LINDSAY SCOTT)
and RONDA SCOTT, his wife;)
CHRISTOPHER SHELLING and KAREN)

RAY, his wife; FERNANDO SMITH;)
RICO SMITH and GUIMAY SMITH, his)
wife; RALPH STATEN, JR.; TERRY W.)
TAUSCH and ELIZABETH TAUSCH, his)
wife; GREGORY TAYLOR; ADALIUS)
DONQUAIL THOMAS; LAVALE)
THOMAS; ERNEST THOMPSON and)
CASSANDRA THOMPSON, his wife;)
JEFFERY E. TOOTLE and LaDONNA)
TOOTLE, his wife; JESSIE TUGGLE and)
DuJUAN TUGGLE, his wife; SAMMY)
WALKER; MIKE L. WASHINGTON and)
VERONICA WASHINGTON, his wife;)
THEODORE WATTS; PATRICK)
WHITE; JAMES WHITLEY; KEVIN)
WHITLEY and STAR WHITLEY, his wife;)
KEVIN WILLHITE and KAREN)
WILLHITE, his wife,)

Plaintiffs,)

v.)

NATIONAL FOOTBALL LEAGUE; and)
NFL PROPERTIES, LLC,)

Defendants.)

CIVIL ACTION
FILE NO. _____

JURY TRIAL DEMANDED

COMPLAINT FOR DAMAGES

The Plaintiffs, all individuals, hereby file this Complaint for Damages and Jury Trial Demand against the above named Defendants, respectfully showing the Court the following:

INTRODUCTION

1. The National Football League (“NFL” or “the League”) is America’s most successful and popular sports league. With 32 member teams, the League is a multi-billion dollar business. The NFL is and has always been eager to avoid negative publicity and protect the product on the field. As a result, the NFL regulates just about everything as it pertains to their teams, including League policies, player appearances, marketing, and safety, among other activities.

2. As recognized by the League, professional football is a tough, aggressive, and physically demanding sport. Injuries are common. As such, it is vital to the safety of the players that the NFL act reasonably, to identify the risks of serious injury associated with playing professional football, to keep the teams and players informed of the risks that they identify, and to take reasonable steps to protect players. Aware of this responsibility, the NFL, through its own initiative, created the Mild Traumatic Brain Injury Committee (“MTBI” or “Committee”) in 1994 to research, and presumably looks to ameliorate, what was already a tremendous problem in the League – concussions.

3. Head injuries have been the topic in a wide variety of relatively recent news articles and television segments, and were addressed by the League in an

announcement that it would penalize illegal blows to the head. But, as noted, head injuries are not a new problem. For decades, the League's players have been plagued by the devastating effects of concussions.

4. Despite overwhelming medical evidence that on-field concussions lead directly to brain injuries and frequent tragic repercussions for retired players, the NFL not only failed to take reasonable actions in an attempt to protect players from suffering, but failed to inform players of the true risks associated with concussions. Instead, the NFL chose to misrepresent and/or conceal medical evidence recognized by its "hand-picked" committee of physicians who were researching same. While athletes in other professional sports who had suffered concussions were being effectively withheld from play ("shut down") for long periods of time or full seasons, NFL protocol was to return players who had suffered concussions to *the very game in which the injury occurred*.

5. The NFL has purposefully attempted to obfuscate the issue and has repeatedly refuted the connection between concussions and brain injury. Congress has vehemently objected to the NFL's handling of the issue on several occasions. In the 17 years since its formation, the MTBI has served as nothing short of a roadblock to any genuine attempt to appropriately inform and protect teams and

NFL players regarding concussions and resultant brain injury. The Committee's misrepresentation and concealment of relevant medical information over the years has caused an increased risk of debilitating and/or life-threatening injury to players who were purposefully not being apprised of the findings.

6. The NFL has failed to satisfy its duty to take reasonable steps necessary to protect players from devastating head injuries. Moreover, the NFL has downplayed and misrepresented the issues and misled players concerning the risks associated with concussions.

THE PARTIES

7. Mr. Jamal Anderson is a citizen of the State of Georgia, residing in Duluth, Fulton County, Georgia.

8. Mr. Karsten Bailey and his wife, Christie Bailey, are citizens of the State of Georgia, residing in Newnan, Coweta County, Georgia.

9. Mr. Fred Banks is a citizen of the State of Georgia, residing in Douglasville, Douglas County, Georgia.

10. Mr. Terry P. Beasley and his wife, Marlene Beasley, are citizens of the State of Alabama, residing in Moody, Saint Clair County, Alabama.

11. Mr. Guy R. Bingham and his wife, Sharon Bingham, are citizens of the State of Montana, residing in Missoula, Missoula County, Montana.

12. Mr. Anthony Blaylock is a citizen of the State of Georgia, residing in Atlanta, Fulton County, Georgia.

13. Mr. David S. Brandon and his wife, Zondra Brandon, are citizens of the State of Georgia, residing in Suwanee, Gwinnett County, Georgia.

14. Mr. Timothy W. Broady is a citizen of the State of Georgia, residing in Atlanta, Fulton County, Georgia.

15. Mr. Steven Broussard is a citizen of the State of California, residing in Duarte, Los Angeles County, California.

16. Mr. Curtis Brown is a citizen of the State of Georgia residing in Atlanta, DeKalb County, Georgia.

17. Mr. Keith Browner is a citizen of the State of California, residing in San Leandro, Alameda County, California.

18. Mr. Ross Browner and his wife, Shayla Browner, are citizens of the State of Tennessee, residing in Nashville, Davidson County, Tennessee.

19. Mr. Jeffery Bryant is a citizen of the State of Georgia, residing in Decatur, DeKalb County, Georgia.

20. Mr. Warren Bryant is a citizen of the State of Georgia, residing in Smyrna, Cobb County, Georgia.

21. Mr. Daniel Buggs and his wife, Angela Buggs, are citizens of the State of Georgia, residing in Ellenwood, DeKalb County, Georgia.

22. Mr. Joe Burns and his wife, Tiffany Burns, are citizens of the State of Georgia, residing in Atlanta, Fulton County, Georgia.

23. Mr. Raymond L. Butler is a citizen of the State of Texas, residing in Houston, Harris County, Texas.

24. Mr. William Carr is a citizen of the State of Texas, residing in Dallas, Dallas County, Texas.

25. Mr. Alphonso Carreker and his wife, Kimberly B. Carreker, are citizens of the State of Georgia, residing in Marietta, Cobb County, Georgia.

26. Mr. Travis Carroll is a citizen of the State of Florida, residing in Jacksonville, Duval County, Florida.

27. Mr. Lavonya Carter is a citizen of the State of Georgia, residing in Ellenwood, DeKalb County, Georgia.

28. Mr. Johndale E. Carty and his wife, Latonia Carty, are citizens of the State of Florida, residing in Miramar, Broward County, Florida.

29. Mr. Robert Chancey and his wife, LaShawnza Chancey, are citizens of the State of Alabama, residing in Coosada, Elmore County, Alabama.

30. Mr. Herbert Christopher and his wife, Bessie Christopher, are citizens of the State of Georgia, residing in Lithonia, DeKalb County, Georgia.

31. Mr. Stephen Clark and his wife, Charl Clark, are citizens of the State of Idaho, residing in Boise, Ada County, Idaho.

32. Mr. Felipe Claybrooks is a citizen of the State of Georgia, residing in Decatur, DeKalb County, Georgia.

33. Mr. Cosey Coleman and his wife, Rernitval Coleman, are citizens of the State of Florida, residing in Tampa, Hillsborough County, Florida.

34. Mr. Roderick Coleman and his wife, Sequoia Coleman, are citizens of the State of Georgia, residing in Flowery Branch, Hall County, Georgia.

35. Mr. Calvin Collins and his wife, Felisha Collins, are citizens of the State of Georgia, residing in Suwanee, Gwinnett County, Georgia.

36. Mr. Robert Thomas Cooksey and his wife, Cynthia A. Cooksey, are citizens of the State of Georgia, residing in Suwanee, Gwinnett County, Georgia.

37. Mr. Deke Cooper and his wife, Gwen Cooper, are citizens of the State of Georgia, residing in Ellenwood, DeKalb County, Georgia.

38. Mr. Danny Lamar Copeland and his wife, Joann Copeland, are citizens of the State of Georgia, residing in Mitchell, Grady County, Georgia.

39. Mr. Michael A. Curcio is a citizen of the State of New Jersey, residing in Mays Landing, Atlantic County, New Jersey.

40. Mr. Mitchell L. Davis is a citizen of the State of Georgia, residing in Lawrenceville, Gwinnett County, Georgia.

41. Mr. Wallace Davis and his wife, Ann H. Davis, are citizens of the State of Georgia, residing in Columbus, Muscogee County, Georgia.

42. Mr. Curtis R. Dickey and his wife, Deanna Dickey, are citizens of the State of Texas, residing in Mansfield, Tarrant County, Texas.

43. Mr. Floyd Dixon and his wife, Katrina Dixon, are citizens of the State of Texas, residing in Houston, Harris County, Texas.

44. Mr. Christopher J. Doleman is a citizen of the State of Georgia, residing in Johns Creek, Fulton County, Georgia.

45. Mr. Eric Dorsey is a citizen of the State of New Jersey, residing in Teaneck, Bergen County, New Jersey.

46. Mr. Jamie R. Duncan is a citizen of the State of Florida, residing in Tampa, Hillsborough County, Florida.

47. Mr. Marc Edwards and his wife, Darsi Edwards, are citizens of the State of Florida, residing in Jacksonville, Duval County, Florida.

48. Mr. Melvin Farr, Jr. is a citizen of the State of Georgia, residing in Marietta, Cobb County, Georgia.

49. Mr. Michael Farr and his wife, Cynthia Farr, are citizens of the State of Georgia, residing in Atlanta, Fulton County, Georgia.

50. Mr. Elliott Fortune is a citizen of the State of New York, residing in Freeport, Nassau County, New York.

51. Mr. James Geathers is a citizen of the State of South Carolina, residing in Andrews, Georgetown County, South Carolina.

52. Mr. Victor Green and his wife, Esther Green, are citizens of the State of Georgia, residing in Alpharetta, Fulton County, Georgia.

53. Mr. D. Kris Haines and his wife, Mary Ann Haines, are citizens of the State of Illinois, residing in Chicago, Cook County, Illinois.

54. Mr. Ruffin Hamilton and his wife, Dena Hamilton, are citizens of the State of Georgia, residing in Woodstock, Cherokee County, Georgia.

55. Mr. Terry Hardy and his wife, Lakesha Hardy, are citizens of the State of Alabama, residing in Elmore, Elmore County, Alabama.

56. Mr. Duriel Harris and his wife, Julie Harris, are citizens of the State of Texas, residing in Beaumont, Jefferson County, Texas.

57. Mr. Garrison Hearst is a citizen of the State of Georgia, residing in Lincolnton, Lincoln County, Georgia.

58. Mr. Efrem Hill and his wife, Tiya Hill, are citizens of the State of Georgia, residing in Lawrenceville, Gwinnett County, Georgia.

59. Mr. Stephen Hobbs and his wife, Dee Hobbs, are citizens of the State of Alabama, residing in Birmingham, Jefferson County, Alabama.

60. Mr. Kelly Holcomb and his wife, Lorie Holcomb, are citizens of the State of Tennessee, residing in Murfreesboro, Rutherford County, Tennessee.

61. Mr. Rodney Holman and his wife, Sandra Holman, are citizens of the State of Louisiana, residing in Slidell, Saint Tammany County, Louisiana.

62. Mr. Bruce B. Holmes is a citizen of the State of Georgia, residing in Ellenwood, DeKalb County, Georgia.

63. Mr. Sedrick Irvin is a citizen of the State of Florida, residing in Homestead, Dade County, Florida.

64. Mr. Chris Jacke is a citizen of the State of Wisconsin, residing in Green Bay, Brown County, Wisconsin.

65. Mr. Alfred Jenkins is a citizen of the State of Georgia, residing in Atlanta, Fulton County, Georgia.

66. Mr. Anthony Johnson is a citizen of the State of Texas, residing in Universal City, Bexar County, Texas.

67. Mr. Larry Johnson, Sr. and his wife, Cathy Johnson, are citizens of the State of Georgia, residing in Decatur, DeKalb County, Georgia.

68. Mr. Sidney Johnson and his wife, Catrice Johnson, are citizens of the State of Virginia, residing in Ashburn, Loudoun County, Virginia.

69. Mr. Joseph Brian Johnston and his wife, Mes Johnston, are citizens of the State of North Carolina, residing in Raleigh, Wake Forest County, North Carolina.

70. Mr. Robert J. Kelly, III and his wife, Emily Kelly, are citizens of the State of Ohio, residing in Delaware, Delaware County, Ohio.

71. Mr. Allan Kennedy is a citizen of the State of California, residing in San Mateo, San Mateo County, California.

72. Mr. Ed King and his wife, Angela Gwen King, are citizens of the State of Alabama, residing in Phenix City, Russell County, Alabama.

73. Mr. Jevon Langford and his wife, Jayna Langford, are citizens of the State of Oklahoma, residing in Stillwater, Payne County, Oklahoma.

74. Mr. Robert L. Lavette, Jr. is a citizen of the State of Georgia, residing in Austell, Cobb County, Georgia.

75. Mr. Kevin Lee and his wife, Nicole Lee, are citizens of the State of Alabama, residing in Hoover, Jefferson County, Alabama.

76. Mr. Steve Luke and his wife, Lori Luke, are citizens of the State of Ohio, residing in Columbus, Franklin County, Ohio.

77. Mr. Don Majkowski and his wife, Kelly Majkowski, are citizens of the State of Georgia, residing in Johns Creek, Fulton County, Georgia.

78. Mr. Dewey McClain and his wife, Linda McClain, are citizens of the State of Georgia, residing in Lawrenceville, Gwinnett County, Georgia.

79. Mr. Dana McLemore and his wife, Karyn McLemore, are citizens of the State of California, residing in San Mateo, San Mateo County, California.

80. Mr. Robert A. Micho is a citizen of the State of Colorado, residing in Englewood, Arapahoe County, Colorado.

81. Mr. Jermaine Miles and his wife, Cassandra Miles, are citizens of the State of New York, residing in Uniondale, Nassau County, New York.

82. Mr. Calvin Miller and his wife, Dee Miller, are citizens of the State of Oklahoma, residing in Stillwater, Payne County, Oklahoma.

83. Mr. Shannon L. Mitchell and his wife, Frenchie Mitchell, are citizens of the State of Tennessee, residing in Alcoa, Blount County, Tennessee.

84. Mr. Stevon Moore and his wife, Jondena Moore, are citizens of the State of Mississippi, residing in Wiggins, Stone County, Mississippi.

85. Mr. Zeke Mowatt is a citizen of the State of New Jersey, residing in Hackensack, Bergen County, New Jersey.

86. Mr. Hubert Oliver and his wife, Rosalyn Wade, are citizens of the State of Georgia, residing in Elyria, Lorain County, Georgia.

87. Mr. Brian O'Neal is a citizen of the State of Florida, residing in Plantation, Broward County, Florida.

88. Mr. Sterling Palmer is a citizen of the State of Georgia, residing in Atlanta, Fulton County, Georgia.

89. Mr. Roosevelt Patterson and his wife, Kiki G. Patterson, are citizens of the State of Alabama, residing in Mobile, Mobile County, Alabama.

90. Mr. Brett Perriman and his wife, Laundria Perriman, are citizens of the State of Georgia, residing in Snellville, Gwinnett County, Georgia.

91. Mr. Keith Ponder and his wife, Janet Ponder, are citizens of the State of Georgia, residing in Atlanta, Fulton County, Georgia.

92. Mr. Stanley Pritchett, Jr. is a citizen of the State of Georgia, residing in Stone Mountain, DeKalb County, Georgia.

93. Mr. Wesley Pritchett is a citizen of the State of South Carolina, residing in Johns Island, Charleston County, South Carolina.

94. Mr. Gary Reasons and his wife, Terri Reasons, are citizens of the State of Texas, residing in McKinney, Collin County, Texas.

95. Mr. Kenneth Reaves is a citizen of the State of Georgia, residing in Douglasville, Douglas County, Georgia.

96. Mr. Alpette Richardson is a citizen of the State of Georgia, residing in Conyers, Rockdale County, Georgia.

97. Mr. Robert L. Robertson, Jr. and his wife, Nneka Robertson, are citizens of the State of Georgia, residing in Smyrna, Cobb County, Georgia.

98. Mr. Jim Romano and his wife, Brigitte Romano, are citizens of the State of Texas, residing in Southlake, Tarrant County, Texas.

99. Mr. Johnny Rutledge and his wife, Gia Rutledge, are citizens of the State of Georgia, residing in Atlanta, Fulton County, Georgia.

100. Mr. O.J. Santiago, is a citizen of the State of Georgia, residing in Dunwoody, DeKalb County, Georgia.

101. Mr. John W. Sawyer is a citizen of the State of Louisiana, residing in Zachary, East Baton Rouge County, Louisiana.

102. Mr. Lindsay Scott and his wife, Ronda Scott, are citizens of the State of Georgia, residing in Valdosta, Lowndes County, Georgia.

103. Mr. Christopher Shelling and his wife, Karen Ray, are citizens of the State of Mississippi, residing in Booneville, Prentiss County, Mississippi.

104. Mr. Fernando Smith is a citizen of the State of Florida, residing in Lake Buena Vista, Orange County, Florida.

105. Mr. Rico Smith and his wife, Guimay Smith, are citizens of the State of California, residing in Lakewood, Los Angeles County, California.

106. Mr. Ralph Staten, Jr. is a citizen of the State of Alabama, residing in Mobile, Mobile County, Alabama.

107. Mr. Terry W. Tausch and his wife, Elizabeth Tausch, are citizens of the State of Texas, residing in Plano, Collin County, Texas.

108. Mr. Gregory Taylor is a citizen of the State of New Jersey, residing in Union, Union County, New Jersey.

109. Mr. Adalius Donquail Thomas is a citizen of the State of Georgia, residing in Duluth, Fulton County, Georgia.

110. Mr. Lavale Thomas is a citizen of the State of California, residing in Sacramento, Sacramento County, California.

111. Mr. Ernest Thompson and his wife, Cassandra Thompson, are citizens of the State of Georgia, residing in Columbus, Muscogee County, Georgia.

112. Mr. Jeffery E. Tootle and his wife, LaDonna Tootle, are citizens of the State of Colorado, residing in Aurora, Arapahoe County, Colorado.

113. Mr. Jessie Tuggle and his wife, DuJuan Tuggle, are citizens of the State of Georgia, residing in Alpharetta, Fulton County, Georgia.

114. Mr. Sammy Walker is a citizen of the State of Pennsylvania, residing in Pittsburgh, Allegheny County, Pennsylvania.

115. Mr. Mike L. Washington and his wife, Veronica Washington, are citizens of the State of Alabama, residing in Pike Road, Montgomery County, Alabama.

116. Mr. Theodore Watts is a citizen of the State of Florida, residing in Tarpon Springs, Pinellas County, Florida.

117. Mr. Patrick White is a citizen of the State of Florida, residing in Fort Lauderdale, Broward County, Florida.

118. Mr. James Whitley is a citizen of the State of Virginia, residing in Virginia Beach, Virginia Beach City County, Virginia.

119. Mr. Kevin Whitley and his wife, Star Whitley, are citizens of the State of Georgia, residing in Atlanta, Fulton County, Georgia.

120. Mr. Kevin Willhite and his wife, Karen Willhite, are citizens of the State of California, residing in Elk Grove, Sacramento County, California.

121. All Defendants, and each of them, are legally responsible for the injuries and damages complained of herein.

122. At all times herein mentioned, Defendants, and each of them, were the agents, servants, and employees of each of the other, acting within the course and scope of said agency and employment.

123. Defendant NFL is a nonprofit, non-incorporated entity organized and existing under the laws of the State of New York, with its principal place of business at 280 Park Ave., 15th Fl., New York, NY 10017. The NFL is not, and has not been, the employer of Plaintiffs, who were employed by independent team

clubs during their career in professional football. The NFL regularly conducts business in Georgia.

124. Defendant NFL Properties, LLC, as the successor-in-interest to National Football League Properties, Inc. (“NFL Properties”) is a limited liability company organized under the laws of the State of Delaware with its principal place of business in the State of New York. NFL Properties is engaged in, among other activities, approving, licensing and promoting equipment by all the NFL teams. NFL Properties regularly conducts business in Georgia.

JURISDICTION AND VENUE

125. This Court has jurisdiction over this action pursuant to 28 U.S.C. § 1332(a), as there is diversity of citizenship and the amount in controversy exceeds \$75,000, exclusive of interests and costs.

126. This Court has personal jurisdiction over Defendants as it does business in Georgia, has a franchise which plays in Georgia, and derives substantial revenue from its contacts with Georgia.

127. Venue properly lies in this district pursuant to 28 U.S.C. § 1391(a)(2) and 1391(b)(2) as a substantial part of the events and/or omissions giving rise to

the claims emanated from activities within this jurisdiction and the Defendants conduct substantial business in this jurisdiction.

ALLEGATIONS APPLICABLE TO ALL COUNTS
THE NATIONAL FOOTBALL LEAGUE

128. The NFL acts as a trade association for thirty-two (32) franchise owners, and consists of two (2) structured conferences, the AFC and the NFC comprised of thirty-two (32) teams.

129. The NFL is a separate entity from each of its teams. *American Needle, Inc. v. NFL, et al.*, 130 S. Ct. 2201 (U.S. 2010).

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

131. The NFL governs and promotes the game of American football, sets and enforces rules and league policies, and regulates team ownership. It generates revenue mostly through marketing sponsorships, licensing merchandise and by selling national broadcasting rights to the games. The teams share a percentage of the League's overall revenue.

132. Owing in part to its immense financial power and status in American football, the NFL has assumed enormous influence over the research and education

of football injuries to physicians, trainers, coaches, and amateur football players at all levels of the game.

133. The League's website www.nflhealthandsafety.com states that USA Football, the sport's national governing body, "is the Official Youth Football Development Partner of the NFL and the NFL Players Association. The independent non-profit organization leads the development of youth, high school and international amateur football. In addition, USA Football operates programs and builds resources to address key health and safety issues in partnership with leading medical organizations. The organization was endowed by the NFL and NFLPA through the NFL Youth Football Fund in 2002. USA Football stands among the leaders in youth sports concussion education, particularly for football."

THE NFL AND THE CBA

134. Until March of 2011, all NFL players were members of a union called the National Football League Players Association ("NFLPA"). The NFLPA negotiates the general minimum contract for all players in the League with the National Football League Management Council ("NFLMC"). This contract is called the Collective Bargaining Agreement ("CBA") and it is the central document that governs the negotiation of individual player contracts for all of the

League's players. However, the NFL retired players have not been the subject of or a party to the CBA.

135. Plaintiffs are retirees and not signatories to the CBA, nor are they the subject of or a party to an agreement between the NFL and the NFLPA. Plaintiffs' claims are not preempted by federal labor law since the CBA does not apply to their claims.

THE NATURE OF HEAD INJURIES SUFFERED BY NFL PLAYERS

136. The American Association of Neurological Surgeons defines a concussion as "a clinical syndrome characterized by an immediate and transient alteration in brain function, including an alteration of mental status and level of consciousness, resulting from mechanical force or trauma." The injury generally occurs when the head either accelerates rapidly and then is stopped, or is spun suddenly. The results frequently include confusion, blurred vision, memory loss, nausea and, sometimes, unconsciousness.

137. A hit to the head may result in smashing, jiggling and torquing of the brain while causing strains and tears, snapping blood vessels, killing brain cells (neurons) and shearing the delicate connections (axons) that link this incredibly complex organ.

138. Medical evidence has shown that symptoms of a concussion can reappear hours or days after the injury, indicating that the injured party had not healed from the injury.

139. According to neurologists, once a person suffers a concussion, he is as much as four times more likely to sustain a second concussion. Additionally, after several concussions, a lesser impact may cause the injury, and the injured player requires more time to recover.

140. Clinical and neuropathological studies by some of the nation's foremost experts demonstrate that multiple concussions sustained during an NFL player's career may cause severe cognitive problems such as depression and early-onset dementia.

141. Chronic Traumatic Encephalopathy ("CTE") is a progressive degenerative disease of the brain found in athletes (and others) with a history of repetitive concussions. Conclusive studies have shown this condition to be prevalent in retired professional football players who have a history of head injury.

142. Head trauma, which includes multiple concussions, triggers progressive degeneration of the brain tissue. These changes in the brain can begin months, years, or even decades after the last concussion or end of active athletic

involvement. The brain degeneration is associated with memory loss, confusion, impaired judgment, paranoia, impulse control problems, aggression, depression, and eventually, progressive dementia.

143. In 2002, Dr. Bennet Omalu, a forensic pathologist and neuropathologist, found CTE in the brain of NFL Hall of Famer Mike Webster.

144. By 2007, Dr. Omalu found a fourth case linking the death of a former NFL player to CTE from his football career.

145. Around the same time period, the University of North Carolina's Center for the Study of Retired Athletes published survey-based papers in 2005 through 2007 that found a clear correlation between NFL football and depression, dementia, and other cognitive impairment.

146. In 1994, the NFL undertook the responsibility of studying concussion research through funding the MTBI Committee.

147. The NFL MTBI Committee published its findings in 2004 showing "no evidence of worsening injury or chronic cumulative effects" from multiple concussions. In a related study, the Committee found "many NFL players can be safely allowed to return to play" on the day of a concussion if they are without symptoms and cleared by a physician.

148. Commissioner Roger Goodell in June of 2007 admitted publicly that the NFL has been studying the effects of traumatic brain injury for “close to 14 years...”

149. It was not until June of 2010 that the NFL publicly acknowledged that concussions can lead to dementia, memory loss, CTE and related symptoms by publishing warnings to every player and team.

150. To date, neuroanatomists have performed autopsies on 13 former NFL players who died after exhibiting signs of degenerative brain disease. Twelve of these players were found to have suffered from CTE.

151. Until very recently, CTE could only be diagnosed by autopsy.

NFL’S DUTY TO PLAYERS AND THE PUBLIC

152. The NFL overtly undertook a duty to study concussions on behalf of NFL players.

153. The NFL owed a duty to players including Plaintiffs, in the following respects:

- (a) It owed a duty of reasonable care to protect Plaintiffs on the playing field;

(b) It owed a duty of reasonable care to Plaintiffs to educate them and other players in the NFL about CTE and/or concussion injury;

(c) It owed a duty of reasonable care to Plaintiffs to educate trainers, physicians, and coaches about CTE and/or concussion injury;

(d) It owed a duty of reasonable care to Plaintiffs to have in place strict return-to-play guidelines to prevent CTE and/or concussion injury;

(e) It owed a duty of reasonable care to Plaintiffs to promote a “whistleblower” system where teammates would bring to the attention of a trainer, physician, or coach that another player had sustained concussion injury;

(f) It owed a duty of reasonable care to Plaintiffs to design rules and penalties for players who use their head or upper body to hit or tackle;

(g) It owed a duty of reasonable care to Plaintiffs to design rules to eliminate the risk of concussion during games and/or practices;

(h) It owed a duty of reasonable care to Plaintiffs to promote research into and cure for CTE and the effects of concussion injury over a period of time; and

(i) It owed a duty of reasonable care to State governments, local sports organizations, all American Rules Football leagues and players, and the

public at large to protect against the long-term effects of CTE and/or concussion injury.

154. The NFL knew as early as the 1920's of the potential harmful effects on player's who suffer concussions; however, until June of 2010, they concealed these facts from coaches, trainers, players, and the public.

155. Plaintiffs did not know, nor did they have reason to know, the long-term effects of concussions and relied on the Defendants to provide reasonable warnings, rules, regulations and studies.

DEFENDANTS' KNOWLEDGE OF THE RISK OF CONCUSSIONS

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

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

158. While Defendants undertook to investigate, research, and promulgate multiple safety rules, Defendants were negligent in failing to act reasonably and exercise their duty to enact reasonable league-wide guidelines and mandatory rules

regulating post-concussion medical treatment and return-to-play standards for players who had suffered a concussion and/or multiple concussions.

159. Defendants affirmatively assumed a duty to use reasonable care in the study of post-concussion syndrome, and to use reasonable care in the publication of data from the MTBI Committee's work.

160. Rather than exercising reasonable care in these duties, Defendants immediately engaged in a long-running course of negligent conduct.

161. By failing to exercise their duty to enact reasonable and prudent rules to better protect players against the risks associated with repeated brain trauma, Defendants' failure to exercise their independent duty has led to the deaths of some, and brain injuries of many other former players, including Plaintiffs.

162. Defendants' ongoing undertaking to protect the health and safety of the players is evidenced by the NFL's enactment of at least the following non-exhaustive list of rules pertaining to players' health and safety:

(a) In 1956, the NFL enacted a rule that prohibited the grabbing of any player's facemask, other than the ball carrier;

(b) In 1962, the NFL enacted a rule that prohibited players from grabbing any player's facemask;

(c) In 1976, the NFL enacted a rule that prohibited players from grabbing the facemask of an opponent. The penalty for an incidental grasp of the facemask was 5 yards. The penalty for twisting, turning, or pulling the facemask was 15 yards. A player could be ejected from the game if the foul is judged to be vicious and/or flagrant;

(d) In 1977, the NFL enacted a rule that prohibited players from slapping the head of another player during play. This rule was referred to as the “Deacon Jones Rule,” named after the Rams’ defensive end who frequently used this technique;

(e) In 1977, the NFL enacted a rule that prohibited Offensive Lineman from thrusting their hands into a defender’s neck, face, or head;

(f) In 1979, the NFL enacted a rule that prohibited players from using their helmets to butt, spear, or ram an opponent. Pursuant to this rule, any player who used the crown or top of his helmet unnecessarily will be called for unnecessary roughness;

(g) In 1980, the NFL enacted rule changes that provided greater restrictions on contact in the area of the head, neck, and face;

(h) In 1980, the NFL enacted rule changes that prohibited players from directly striking, swinging, or clubbing the head, neck, or face (“personal foul”). Beginning in 1980, a penalty could be called for such contact whether or not the initial contact was made below the neck area;

(i) In 1982, the NFL enacted a rule change by which the penalty for incidental grabbing of a facemask by a defensive team was changed from 5 yards to an automatic first down plus a 5 yard penalty;

(j) In 1983, the NFL enacted a rule that prohibited players from using a helmet as a weapon to strike or hit an opponent;

(k) In 1988, the NFL enacted a rule that prohibited defensive players from hitting quarterbacks below the waist while they are still in the pocket. (The rule was unofficially called the “Andre Waters Rule” based upon a hit that Waters placed on Los Angeles Rams quarterback Jim Everett in 1988); and

(l) Following the 2004-2005 season, the NFL’s Competition Committee reviewed video of the entire season and concluded that the horse-collar tackle resulted in six serious injuries. On May 23, 2005, the NFL owners voted 27-5 to ban such tackles. The ban states that a horse-collar tackle is an

open-field tackle in which a defender uses the shoulder pads to immediately bring a ball carrier down.

163. However, the Defendants failed to enact reasonable rules and regulations for the prevention of traumatic brain injuries.

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

164. Instead of taking measures to actually protect its players from suffering brain injuries, the NFL created the MTBI Committee in 1994 to ostensibly study the effects of concussions on NFL players.

165. The MTBI Committee was chaired by Dr. Elliot Pellman, the New York Jets team trainer, a rheumatologist who is not certified as a brain injury and/or concussion specialist.

166. After 14 years of studies, and after numerous medical journal articles written by the NFL's MTBI Committee, Defendants concluded that "[b]ecause a significant percentage of players returned to play in the same game [after suffering a mild traumatic brain injury] and the overwhelming majority of players with concussions were kept out of football-related activities for less than 1 week, it can be concluded that mild TBI's in professional football are not serious injuries." *See* "Concussion in professional football: Summary of the research conducted by the

National Football League’s Committee on Mild Traumatic Brain Injury.”
Neurosurg Focus 21 (4):E12; 2006, RI. Pellman and D.C. Viano.

167. According to Defendants’ own “studies,” the speedy return to play after suffering a concussion demonstrates that such players were at no greater risk of suffering long-term brain injury.

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

169. A series of clinical and neuropathological studies performed by independent scientists and physicians demonstrated that multiple NFL induced-concussions cause cognitive problems such as depression, early on-set dementia and CTE.

170. In response to these studies, Defendants, to further a scheme of fraud and deceit, had members of the NFL’s MTBI Committee deny knowledge of a link between concussion and cognitive decline.

171. When the NFL’s MTBI Committee anticipated studies that would show causal links between concussion and cognitive degeneration, the Committee

promptly published articles producing contrary findings, as part of Defendants' scheme to deceive Congress, the players and the public at large.

172. Dr. Bennet Omalu examined the brain tissue of deceased NFL players including Mike Webster, Terry Long, Andrew Waters and Justin Strzelczyk. Dr. Omalu in an article in *Neurosurgery* concluded that CTE triggered by multiple NFL concussions, was a partial cause of their death.

173. In response to Dr. Omalu's article, Defendants' MTBI Committee, (Drs. Ira Casson, Eliot Pellman and David Viano) wrote a letter to the editor of *Neurosurgery* asking that Dr. Omalu's article be retracted.

174. A clinical study performed by Dr. Kevin Guskiewicz found that retired players who sustained three or more concussions in the NFL had a five-fold prevalence of mild cognitive impairment. The NFL's MTBI Committee, (Dr. Mark Lowell), promptly attacked the article by refusing to accept a survey of 2,400 former NFL players.

175. Because of Congressional scrutiny and media pressure, the NFL scheduled a league-wide Concussion Summit for June 2007. Defendants, in furtherance of their scheme of deceit issued a pamphlet to players in August 2007, which stated: "there is no magic number for how many concussions is too many."

176. When Boston University's Dr. Ann McKee found CTE present in the brains of two more deceased NFL players, a member of the Committee characterized each study as an "isolated incident" from which no conclusion could be drawn.

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

178. Defendants have yet to amend these inaccurate and misleading statements.

**DEFENDANTS ACKNOWLEDGE THEIR DUTY TO
PROTECT AGAINST THE LONG-TERM RISK OF CONCUSSIONS**

179. On August 14, 2007, Defendants acknowledged their duty to players by enacting rules to protect them against the risk associated with repeated brain trauma.

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

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

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

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

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

185. The NFL's 2007 concussion guidelines indicate when a player with a concussion can return to a game or practice.

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

187. Defendants acknowledged that said guidelines were inadequate and insufficient. As a result, the NFL enacted more strict regulations to handle concussions starting in the 2009 season. Specifically, the NFL announced new rules requiring players who exhibit any significant signs of concussion to be removed from a game or practice and be barred from returning the same day.

188. Nevertheless, it was not until June of 2010 that the NFL warned any player of the long-term risks associated with multiple concussions, including dementia, memory loss, CTE and its related symptoms.

189. As of today, Defendants have not warned retired players of the long-term health effects of concussions.

DEFENDANTS' CONDUCT
WAS DELIBERATE, WILFULL AND WANTON

190. The aforementioned acts and omissions of Defendants demonstrate that they acted deliberately, willfully, and wantonly with indifference to the rights and duties owed and consequences to Plaintiffs.

191. Defendants knew that a substantial risk of physical and mental harm to the NFL players existed in connection with repeated concussive blows to the head, to wit: the danger of irreversible brain-damage and/or dementia. Defendants willfully and deliberately disregarded the safety of others in continually undertaking to establish and promulgate safety rules for the NFL that failed to reasonably address or disclose substantial risk of head injury.

PLAINTIFF JAMAL ANDERSON

192. Plaintiff Jamal Anderson played eight (8) NFL seasons from 1994 – 2001 for the Atlanta Falcons.

193. Throughout his career as a professional football player, Plaintiff Jamal Anderson suffered multiple concussive hits and blows to the head.

194. Plaintiff Jamal Anderson was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

195. Plaintiff Jamal Anderson suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, headaches, and sleeplessness.

PLAINTIFFS KARSTEN BAILEY AND CHRISTIE BAILEY

196. Plaintiff Karsten Bailey played four (4) NFL seasons from 1999 – 2003 for the Seattle Seahawks and the Green Bay Packers.

197. Throughout his career as a professional football player, Plaintiff Karsten Bailey suffered multiple concussive hits and blows to the head.

198. Plaintiff Karsten Bailey was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

199. Plaintiff Karsten Bailey suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, headaches, and difficulty concentrating.

200. Plaintiff's wife, Christie Bailey, brings a claim for loss of consortium.

PLAINTIFF FRED BANKS

201. Plaintiff Fred Banks played eight (8) NFL seasons from 1985 – 1993 for the Cleveland Browns, Miami Dolphins and Chicago Bears.

202. Throughout his career as a professional football player, Plaintiff Fred Banks suffered multiple concussive hits and blows to the head.

203. Plaintiff Fred Banks was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

204. Plaintiff Fred Banks suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, headaches, and sleeplessness.

PLAINTIFFS TERRY P. BEASLEY AND MARLENE BEASLEY

205. Plaintiff Terry P. Beasley played three (3) NFL seasons from 1972 – 1975 for the San Francisco 49ers.

206. Throughout his career as a professional football player, Plaintiff Terry P. Beasley suffered multiple concussive hits and blows to the head.

207. Plaintiff Terry P. Beasley was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

208. Plaintiff Terry P. Beasley suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, headaches, anxiety, and sleeplessness.

209. Plaintiff's wife, Marlene Beasley, brings a claim for loss of consortium.

PLAINTIFFS GUY R. BINGHAM AND SHARON BINGHAM

210. Plaintiff Guy R. Bingham played fourteen (14) NFL seasons from 1980 – 1993 for the New York Jets, Atlanta Falcons, Philadelphia Eagles and Washington Redskins.

211. Throughout his career as a professional football player, Plaintiff Guy R. Bingham suffered multiple concussive hits and blows to the head.

212. Plaintiff Guy R. Bingham was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

213. Plaintiff Guy R. Bingham suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, headaches, difficulty concentrating, and mood swings.

214. Plaintiff's wife, Sharon Bingham, brings a claim for loss of consortium.

PLAINTIFF ANTHONY BLAYLOCK

215. Plaintiff Anthony Blaylock played six (6) NFL seasons, from 1988 – 1993 for the Cleveland Browns, San Diego Chargers and Chicago Bears.

216. Throughout his career as a professional football player, Plaintiff Anthony Blaylock suffered multiple concussive hits and blows to the head.

217. Plaintiff Anthony Blaylock was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed

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

218. Plaintiff Anthony Blaylock suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, headaches, and blurred vision.

PLAINTIFFS DAVID S. BRANDON AND ZONDRA BRANDON

219. Plaintiff David S. Brown played ten (10) NFL seasons from 1987 – 1997 for the San Diego Chargers, Cleveland Browns, Seattle Seahawks and Atlanta Falcons.

220. Throughout his career as a professional football player, Plaintiff David S. Brandon suffered multiple concussive hits and blows to the head.

221. Plaintiff David S. Brandon was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

222. Plaintiff David S. Brandon suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, headaches, anxiety, vision impairment, and sleeplessness.

223. Plaintiff's wife, Zondra Brandon, brings a claim for loss of consortium.

PLAINTIFF TIMOTHY W. BROADY

224. Plaintiff Timothy W. Broady played three (3) NFL seasons from 1989 – 1992 for the Seattle Seahawks, Detroit Lions and Philadelphia Eagles.

225. Throughout his career as a professional football player, Plaintiff Timothy W. Broady suffered multiple concussive hits and blows to the head.

226. Plaintiff Timothy W. Broady was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

227. Plaintiff Timothy W. Broady suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, headaches, and sleeplessness.

PLAINTIFF STEVEN BROUSSARD

228. Plaintiff Steven Broussard played nine (9) NFL seasons from 1990 – 1998 for the Atlanta Falcons, Cincinnati Bengals and Seattle Seahawks.

229. Throughout his career as a professional football player, Plaintiff Steven Broussard suffered multiple concussive hits and blows to the head.

230. Plaintiff Steven Broussard was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

231. Plaintiff Steven Broussard suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, headaches, mood swings, and sleeplessness.

PLAINTIFF CURTIS BROWN

232. Plaintiff Curtis Brown played one (1) NFL season in 1996 for the Baltimore Ravens.

233. Throughout his career as a professional football player, Plaintiff Curtis Brown suffered multiple concussive hits and blows to the head.

234. Plaintiff Curtis Brown was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

235. Plaintiff Curtis Brown suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, headaches, and impaired motor skills.

PLAINTIFF KEITH BROWNER

236. Plaintiff Keith Browner played five (5) NFL seasons from 1984 – 1988 for the Tampa Bay Buccaneers, San Francisco 49ers, Los Angeles Raiders and San Diego Chargers.

237. Throughout his career as a professional football player, Plaintiff Keith Browner suffered multiple concussive hits and blows to the head.

238. Plaintiff Keith Browner was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

239. Plaintiff Keith Browner suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, headaches, and sleeplessness.

PLAINTIFFS ROSS BROWNER AND SHAYLA BROWNER

240. Plaintiff Ross Browner played ten (10) NFL seasons from 1978 – 1988 for the Cincinnati Bengals, Green Bay Packers and Los Angeles Rams.

241. Throughout his career as a professional football player, Plaintiff Ross Browner suffered multiple concussive hits and blows to the head.

242. Plaintiff Ross Browner was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

243. Plaintiff Ross Browner suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, headaches, and blurred vision.

244. Plaintiff's wife, Shayla Browner, brings a claim for loss of consortium.

PLAINTIFF JEFFERY BRYANT

245. Plaintiff Jeffery Bryant played twelve (12) NFL seasons from 1982 – 1993 for the Seattle Seahawks.

246. Throughout his career as a professional football player, Plaintiff Jeffery Bryant suffered multiple concussive hits and blows to the head.

247. Plaintiff Jeffery Bryant was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

248. Plaintiff Jeffery Bryant suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, headaches, sensitivity to light, depression, and sleeplessness.

PLAINTIFF WARREN BRYANT

249. Plaintiff Warren Bryant played eight (8) NFL seasons, from 1977 – 1984 for the Atlanta Falcons and Los Angeles Raiders.

250. Throughout his career as a professional football player, Plaintiff Warren Bryant suffered multiple concussive hits and blows to the head.

251. Plaintiff Warren Bryant was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

252. Plaintiff Warren Bryant suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, headaches, and dizziness.

PLAINTIFFS DANIEL BUGGS AND ANGELA BUGGS

253. Plaintiff Daniel Buggs played five (5) NFL seasons, from 1975 – 1979 for the New York Giants and Washington Redskins.

254. Throughout his career as a professional football player, Plaintiff Daniel Buggs suffered multiple concussive hits and blows to the head.

255. Plaintiff Daniel Buggs was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

256. Plaintiff Daniel Buggs suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, headaches, and sleeplessness.

257. Plaintiff's wife, Angela Buggs, brings a claim for loss of consortium.

PLAINTIFFS JOE BURNS AND TIFFANY BURNS

258. Plaintiff Joe Burns played four (4) NFL seasons from 2002 – 2005 for the Buffalo Bills.

259. Throughout his career as a professional football player, Plaintiff Joe Burns suffered multiple concussive hits and blows to the head.

260. Plaintiff Joe Burns was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

261. Plaintiff Joe Burns suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, headaches, and sleeplessness.

262. Plaintiff's wife, Tiffany Burns, brings a claim for loss of consortium.

PLAINTIFF RAYMOND L. BUTLER

263. Plaintiff Raymond L. Butler played nine (9) NFL seasons from 1980 – 1988 for the Baltimore Colts, Indianapolis Colts and Seattle Seahawks.

264. Throughout his career as a professional football player, Plaintiff Raymond L. Butler suffered multiple concussive hits and blows to the head.

265. Plaintiff Raymond L. Butler was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

266. Plaintiff Raymond L. Butler suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, headaches, and dizziness.

PLAINTIFF WILLIAM CARR

267. Plaintiff William Carr played three (3) NFL seasons from 1997 – 1999 for the Cincinnati Bengals, Carolina Panthers, San Francisco 49ers and Atlanta Falcons.

268. Throughout his career as a professional football player, Plaintiff William Carr suffered multiple concussive hits and blows to the head.

269. Plaintiff William Carr was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

270. Plaintiff William Carr suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, headaches, and sleeplessness.

PLAINTIFFS ALPHONSO CARREKER AND KIMBERLY B. CARREKER

271. Plaintiff Alphonso Carreker played seven (7) NFL seasons from 1984 – 1991 for the Green Bay Packers and Denver Broncos.

272. Throughout his career as a professional football player, Alphonso Carreker suffered multiple concussive hits and blows to the head.

273. Plaintiff Alphonso Carreker was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

274. Plaintiff Alphonso Carreker suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, headaches, and mood swings.

275. Plaintiff's wife, Kimberly B. Carreker, brings a claim for loss of consortium.

PLAINTIFF TRAVIS CARROLL

276. Plaintiff Travis Carroll played two (2) NFL seasons from 2002 – 2003 for the New Orleans Saints and Houston Texans.

277. Throughout his career as a professional football player, Plaintiff Travis Carroll suffered multiple concussive hits and blows to the head.

278. Plaintiff Travis Carroll was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

279. Plaintiff Travis Carroll suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, headaches, and blurred vision.

PLAINTIFF LAVONYA CARTER

280. Plaintiff Lavonya Carter played four (4) NFL seasons from 2001 – 2004 for the Dallas Cowboys and New York Jets.

281. Throughout his career as a professional football player, Plaintiff Lavonya Carter suffered multiple concussive hits and blows to the head.

282. Plaintiff Lavonya Carter was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

283. Plaintiff Lavonya Carter suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, headaches, and sleeplessness.

PLAINTIFFS JOHNDALE E. CARTY AND LATONIA CARTY

284. Plaintiff Johndale E. Carty played four (4) NFL seasons from 1999 – 2002 for the Atlanta Falcons.

285. Throughout his career as a professional football player, Plaintiff Johndale E. Carty suffered multiple concussive hits and blows to the head.

286. Plaintiff Johndale E. Carty was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

287. Plaintiff Johndale E. Carty suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, headaches, and sleeplessness.

288. Plaintiff's wife, Latonia Carty, brings a claim for loss of consortium.

PLAINTIFFS ROBERT CHANCEY AND LASHAWNZA CHANCEY

289. Plaintiff Robert Chancey played four (4) NFL seasons from 1997 – 2000 for the San Diego Chargers, Chicago Bears and Dallas Cowboys.

290. Throughout his career as a professional football player, Plaintiff Robert Chancey suffered multiple concussive hits and blows to the head.

291. Plaintiff Robert Chancey was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

292. Plaintiff Robert Chancey suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, headaches, and hearing impairment.

293. Plaintiff's wife, LaShawnza Chancey, brings a claim for loss of consortium.

PLAINTIFFS HERBERT CHRISTOPHER AND BESSIE CHRISTOPHER

294. Plaintiff Herbert Christopher played four (4) NFL seasons from 1979 – 1982 for the Kansas City Chiefs.

295. Throughout his career as a professional football player, Plaintiff Herbert Christopher suffered multiple concussive hits and blows to the head.

296. Plaintiff Herbert Christopher was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

297. Plaintiff Herbert Christopher suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, headaches, and sleeplessness.

298. Plaintiff's wife, Bessie Christopher, brings a claim for loss of consortium.

PLAINTIFFS STEPHEN CLARK AND CHARL CLARK

299. Plaintiff Stephen Clark played four (4) NFL seasons from 1982 – 1986 for the Miami Dolphins.

300. Throughout his career as a professional football player, Plaintiff Stephen Clark suffered multiple concussive hits and blows to the head.

301. Plaintiff Stephen Clark was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

302. Plaintiff Stephen Clark suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, headaches, and sleeplessness.

303. Plaintiff's wife, Charl Clark, brings a claim for loss of consortium.

PLAINTIFF FELIPE CLAYBROOKS

304. Plaintiff Felipe Claybrooks played three (3) NFL seasons from 2001 – 2003 for the Cleveland Browns.

305. Throughout his career as a professional football player, Plaintiff Felipe Claybrooks suffered multiple concussive hits and blows to the head.

306. Plaintiff Felipe Claybrooks was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed

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

307. Plaintiff Felipe Claybrooks suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, headaches, and sleeplessness.

PLAINTIFFS COSEY COLEMAN AND RERNITVAL COLEMAN

308. Plaintiff Cosey Coleman played seven (7) NFL seasons from 2000 – 2006 for the Tampa Bay Buccaneers and Cleveland Browns.

309. Throughout his career as a professional football player, Plaintiff Cosey Coleman suffered multiple concussive hits and blows to the head.

310. Plaintiff Cosey Coleman was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

311. Plaintiff Cosey Coleman suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, headaches, and sleeplessness.

312. Plaintiff's wife, Rernitval Coleman, brings a claim for loss of consortium.

PLAINTIFFS RODERICK COLEMAN AND SEQUOIA COLEMAN

313. Plaintiff Roderick Coleman played nine (9) NFL seasons from 1999 – 2007 for the Oakland Raiders and Atlanta Falcons.

314. Throughout his career as a professional football player, Plaintiff Roderick Coleman suffered multiple concussive hits and blows to the head.

315. Plaintiff Roderick Coleman was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

316. Plaintiff Roderick Coleman suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, headaches, mood swings and depression, and sensitivity to light.

317. Plaintiff's wife, Sequoia Coleman, brings a claim for loss of consortium.

PLAINTIFFS CALVIN COLLINS AND FELISHA COLLINS

318. Plaintiff Calvin Collins played five (5) NFL seasons from 1997 – 2001 for the Atlanta Falcons, Minnesota Vikings, Houston Texans, Pittsburgh Steelers and Denver Broncos.

319. Throughout his career as a professional football player, Plaintiff Calvin Collins suffered multiple concussive hits and blows to the head.

320. Plaintiff Calvin Collins was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

321. Plaintiff Calvin Collins suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, headaches, mood swings and depression, and ringing in the ears.

322. Plaintiff's wife, Felisha Collins, brings a claim for loss of consortium.

**PLAINTIFFS ROBERT THOMAS COOKSEY
AND CYNTHIA A. COOKSEY**

323. Plaintiff Robert Thomas Cooksey played one (1) NFL season in 1981 for the Atlanta Falcons.

324. Throughout his career as a professional football player, Plaintiff Robert Thomas Cooksey suffered multiple concussive hits and blows to the head.

325. Plaintiff Robert Thomas Cooksey was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

326. Plaintiff Robert Thomas Cooksey suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, depression, impaired cognitive functioning, and dementia.

327. Plaintiff's wife, Cynthia A. Cooksey, brings a claim for loss of consortium.

PLAINTIFFS DEKE COOPER AND GWEN COOPER

328. Plaintiff Deke Cooper played seven (7) NFL seasons from 2002 – 2007 for the Carolina Panthers, Jacksonville Jaguars and San Francisco 49ers.

329. Throughout his career as a professional football player, Plaintiff Deke Cooper suffered multiple concussive hits and blows to the head.

330. Plaintiff Deke Cooper was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed

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

331. Plaintiff Deke Cooper suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, headaches, and sleeplessness.

332. Plaintiff's wife, Gwen Cooper, brings a claim for loss of consortium.

PLAINTIFFS DANNY LAMAR COPELAND AND JOANN COPELAND

333. Plaintiff Danny Lamar Copeland played five (5) NFL seasons from 1989 – 1993 for the Kansas City Chiefs and Washington Redskins.

334. Throughout his career as a professional football player, Plaintiff Danny Lamar Copeland suffered multiple concussive hits and blows to the head.

335. Plaintiff Danny Lamar Copeland was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

336. Plaintiff Danny Lamar Copeland suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, disorientation, mood swings, difficulty concentrating, and blurred vision.

337. Plaintiff's wife, Joann Copeland, brings a claim for loss of consortium.

PLAINTIFF MICHAEL A. CURCIO

338. Plaintiff Michael A. Curcio played three (3) NFL seasons from 1980 – 1983 for the New York Giants, Philadelphia Eagles and Green Bay Packers.

339. Throughout his career as a professional football player, Plaintiff Michael A. Curcio suffered multiple concussive hits and blows to the head.

340. Plaintiff Michael A. Curcio was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

341. Plaintiff Michael A. Curcio suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, headaches, moods swings and depression.

PLAINTIFF MITCHELL L. DAVIS

342. Plaintiff Mitchell L. Davis played two (2) NFL seasons from 1994 – 1995 for the Atlanta Falcons, Cleveland Browns and New York Giants.

343. Throughout his career as a professional football player, Plaintiff Mitchell L. Davis suffered multiple concussive hits and blows to the head.

344. Plaintiff Mitchell L. Davis was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

345. Plaintiff Mitchell L. Davis suffers from multiple past traumatic brain injuries with symptoms including but not limited to, headaches, memory loss, and sleeplessness.

PLAINTIFFS WALLACE DAVIS AND ANN H. DAVIS

346. Plaintiff Wallace Davis played two (2) NFL seasons from 1966 – 1967 for the Minnesota Vikings and Atlanta Falcons.

347. Throughout his career as a professional football player, Plaintiff Wallace Davis suffered multiple concussive hits and blows to the head.

348. Plaintiff Wallace Davis was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

349. Plaintiff Wallace Davis suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, headaches, and sleeplessness.

350. Plaintiff's wife, Ann H. Davis, brings a claim for loss of consortium.

PLAINTIFFS CURTIS R. DICKEY AND DEANNA DICKEY

351. Plaintiff Curtis R. Dickey played seven (7) NFL seasons from 1980 – 1986 for the Baltimore Colts, Indianapolis Colts and Cleveland Browns.

352. Throughout his career as a professional football player, Plaintiff Curtis R. Dickey suffered multiple concussive hits and blows to the head.

353. Plaintiff Curtis R. Dickey was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

354. Plaintiff Curtis R. Dickey suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, headaches, dizziness, and sleeplessness.

355. Plaintiff's wife, Deanna Dickey, brings a claim for loss of consortium.

PLAINTIFFS FLOYD DIXON AND KATRINA DIXON

356. Plaintiff Floyd Dixon played seven (7) NFL seasons from 1986 – 1992 for the Atlanta Falcons, Philadelphia Eagles and Washington Redskins.

357. Throughout his career as a professional football player, Plaintiff Floyd Dixon suffered multiple concussive hits and blows to the head.

358. Plaintiff Floyd Dixon was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

359. Plaintiff Floyd Dixon suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, headaches, and sleeplessness.

360. Plaintiff's wife, Katrina Dixon, brings a claim for loss of consortium.

PLAINTIFF CHRISTOPHER J. DOLEMAN

361. Plaintiff Christopher J. Doleman played fifteen (15) NFL seasons from 1985 – 1999 for the Minnesota Vikings, Atlanta Falcons and San Francisco 49ers.

362. Throughout his career as a professional football player, Plaintiff Christopher J. Doleman suffered multiple concussive hits and blows to the head.

363. Plaintiff Christopher J. Doleman was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

364. Plaintiff Christopher J. Doleman suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, headaches, and sleeplessness.

PLAINTIFF ERIC DORSEY

365. Plaintiff Eric Dorsey played seven (7) NFL seasons from 1986 – 1992 for the New York Giants.

366. Throughout his career as a professional football player, Plaintiff Eric Dorsey suffered multiple concussive hits and blows to the head.

367. Plaintiff Eric Dorsey was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

368. Plaintiff Eric Dorsey suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, headaches, and sleeplessness.

PLAINTIFF JAMIE R. DUNCAN

369. Plaintiff Jamie R. Duncan played seven (7) NFL seasons from 1998 – 2004 for the Tampa Bay Buccaneers, St. Louis Rams and Atlanta Falcons.

370. Throughout his career as a professional football player, Plaintiff Jamie R. Duncan suffered multiple concussive hits and blows to the head.

371. Plaintiff Jamie R. Duncan was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

372. Plaintiff Jamie R. Duncan suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, headaches, difficulty concentrating, and sleeplessness.

PLAINTIFFS MARC EDWARDS AND DARSI EDWARDS

373. Plaintiff Marc Edwards played nine (9) NFL seasons from 1999 – 2005 for the San Francisco 49ers, Cleveland Browns, New England Patriots, Jacksonville Jaguars and Chicago Bears.

374. Throughout his career as a professional football player, Plaintiff Marc Edwards suffered multiple concussive hits and blows to the head.

375. Plaintiff Marc Edwards was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

376. Plaintiff Marc Edwards suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, headaches, blurred vision, difficulty concentrating, and sleeplessness.

377. Plaintiff's wife, Darsi Edwards, brings a claim for loss of consortium.

PLAINTIFF MELVIN FARR, JR.

378. Plaintiff Melvin Farr, Jr. played one (1) NFL season in 1989 for the Los Angeles Rams

379. Throughout his career as a professional football player, Plaintiff Melvin Farr, Jr. suffered multiple concussive hits and blows to the head.

380. Plaintiff Melvin Farr, Jr. was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

381. Plaintiff Melvin Farr, Jr. suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, headaches, difficulty concentrating, and depression.

PLAINTIFFS MICHAEL FARR AND CYNTHIA FARR

382. Plaintiff Michael Farr played four (4) NFL seasons from 1990 – 1993 for the Detroit Lions and New England Patriots.

383. Throughout his career as a professional football player, Plaintiff Michael Farr suffered multiple concussive hits and blows to the head.

384. Plaintiff Michael Farr was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

385. Plaintiff Michael Farr suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, headaches, and blurred vision.

386. Plaintiff's wife, Cynthia Farr, brings a claim for loss of consortium.

PLAINTIFF ELLIOTT FORTUNE

387. Plaintiff Elliott Fortune played two (2) NFL seasons from 1995 – 1996 for the Cleveland Browns and Baltimore Ravens.

388. Throughout his career as a professional football player, Plaintiff Elliott Fortune suffered multiple concussive hits and blows to the head.

389. Plaintiff Elliott Fortune was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

390. Plaintiff Elliott Fortune suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, headaches, mood swings and depression, and slurred speech.

PLAINTIFF JAMES GEATHERS

391. Plaintiff James Geathers played thirteen (13) NFL seasons from 1984 – 1996 for the New Orleans Saints, Washington Redskins, Atlanta Falcons and Denver Broncos.

392. Throughout his career as a professional football player, Plaintiff James Geathers suffered multiple concussive hits and blows to the head.

393. Plaintiff James Geathers was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

394. Plaintiff James Geathers suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, headaches, and sleeplessness.

PLAINTIFFS VICTOR GREEN AND ESTHER GREEN

395. Plaintiff Victor Green played eleven (11) NFL seasons from 1993 – 2003 for the New York Jets, New England Patriots and New Orleans Saints.

396. Throughout his career as a professional football player, Plaintiff Victor Green suffered multiple concussive hits and blows to the head.

397. Plaintiff Victor Green was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

398. Plaintiff Victor Green suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, headaches, difficulty concentrating, and sensitivity to light.

399. Plaintiff's wife, Esther Green, brings a claim for loss of consortium.

PLAINTIFFS D. KRIS HAINES AND MARY ANN HAINES

400. Plaintiff D. Kris Haines played four (4) NFL seasons from 1979 – 1987 for the Washington Redskins, Chicago Bears and Buffalo Bills.

401. Throughout his career as a professional football player, Plaintiff D. Kris Haines suffered multiple concussive hits and blows to the head.

402. Plaintiff D. Kris Haines was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

403. Plaintiff D. Kris Haines suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, headaches, and sleeplessness.

404. Plaintiff's wife, Mary Ann Haines, brings a claim for loss of consortium.

PLAINTIFFS RUFFIN HAMILTON AND DENA HAMILTON

405. Plaintiff Ruffin Hamilton played four (4) NFL seasons from 1994 – 1999 for the Green Bay Packers and Atlanta Falcons.

406. Throughout his career as a professional football player, Plaintiff Ruffin Hamilton suffered multiple concussive hits and blows to the head.

407. Plaintiff Ruffin Hamilton was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

408. Plaintiff Ruffin Hamilton suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, headaches, anxiety and depression, and sleeplessness.

409. Plaintiff's wife, Dena Hamilton, brings a claim for loss of consortium.

PLAINTIFFS TERRY HARDY AND LAKESHA HARDY

410. Plaintiff Terry Hardy played four (4) NFL seasons from 1998 – 2001 for the Arizona Cardinals.

411. Throughout his career as a professional football player, Plaintiff Terry Hardy suffered multiple concussive hits and blows to the head.

412. Plaintiff Terry Hardy was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

413. Plaintiff Terry Hardy suffers from multiple past traumatic brain injuries with symptoms including but not limited to, headaches, memory loss, mood swings, and difficulty concentrating.

414. Plaintiff's wife, Lakesha Hardy, brings a claim for loss of consortium.

PLAINTIFFS DURIEL HARRIS AND JULIE HARRIS

415. Plaintiff Duriel Harris played ten (10) NFL seasons from 1976 – 1985 for the Miami Dolphins, Cleveland Brown and Dallas Cowboys.

416. Throughout his career as a professional football player, Plaintiff Duriel Harris suffered multiple concussive hits and blows to the head.

417. Plaintiff Duriel Harris was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

418. Plaintiff Duriel Harris suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, headaches, equilibrium imbalance, emotional outbursts, and depression.

419. Plaintiff's wife, Julie Harris, brings a claim for loss of consortium.

PLAINTIFF GARRISON HEARST

420. Plaintiff Garrison Hearst played twelve (12) NFL seasons from 1993 – 2004 for the Phoenix Cardinals, Arizona Cardinals, Cincinnati Bengals, San Francisco 49ers and Denver Broncos.

421. Throughout his career as a professional football player, Plaintiff Garrison Hearst suffered multiple concussive hits and blows to the head.

422. Plaintiff Garrison Hearst was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

423. Plaintiff Garrison Hearst suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, headaches, and sleeplessness.

PLAINTIFFS EFREM HILL AND TIYA HILL

424. Plaintiff Efrem Hill played four (4) NFL seasons from 2005 – 2008 for the Carolina Panthers, Tampa Bay Buccaneers and Cleveland Browns.

425. Throughout his career as a professional football player, Plaintiff Efrem Hill suffered multiple concussive hits and blows to the head.

426. Plaintiff Efrem Hill was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

427. Plaintiff Efrem Hill suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, blurred vision, and headaches.

428. Plaintiff's wife, Tiya Hill, brings a claim for loss of consortium.

PLAINTIFFS STEPHEN HOBBS AND DEE HOBBS

429. Plaintiff Stephen Hobbs played five (5) NFL seasons from 1988 – 1993 for the Washington Redskins and Kansas City Chiefs.

430. Throughout his career as a professional football player, Plaintiff Stephen Hobbs suffered multiple concussive hits and blows to the head.

431. Plaintiff Stephen Hobbs was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

432. Plaintiff Stephen Hobbs suffers from multiple past traumatic brain injuries with symptoms including but not limited to, headaches, memory loss, and difficulty concentrating.

433. Plaintiff's wife, Dee Hobbs, brings a claim for loss of consortium.

PLAINTIFFS KELLY HOLCOMB AND LORIE HOLCOMB

434. Plaintiff Kelly Holcomb played twelve (12) NFL seasons from 1996 – 2007 for the Indianapolis Colts, Cleveland Browns, Buffalo Bills and Minnesota Vikings.

435. Throughout his career as a professional football player, Plaintiff Kelly Holcomb suffered multiple concussive hits and blows to the head.

436. Plaintiff Kelly Holcomb was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

437. Plaintiff Kelly Holcomb suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss and difficulty concentrating.

438. Plaintiff's wife, Lorie Holcomb, brings a claim for loss of consortium.

PLAINTIFFS RODNEY HOLMAN AND SANDRA HOLMAN

439. Plaintiff Rodney Holman played fourteen (14) NFL seasons from 1982 – 1995 for the Cincinnati Bengals and Detroit Lions.

440. Throughout his career as a professional football player, Plaintiff Rodney Holman suffered multiple concussive hits and blows to the head.

441. Plaintiff Rodney Holman was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed

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

442. Plaintiff Rodney Holman suffers from multiple past traumatic brain injuries with symptoms including but not limited to, headaches, memory loss, and difficulty concentrating.

443. Plaintiff's wife, Sandra Holman, brings a claim for loss of consortium.

PLAINTIFF BRUCE B. HOLMES

444. Plaintiff Bruce B. Holmes played two (2) NFL seasons in 1987 and 1993 for the Kansas City Chiefs and Minnesota Vikings.

445. Throughout his career as a professional football player, Plaintiff Bruce B. Holmes suffered multiple concussive hits and blows to the head.

446. Plaintiff Bruce B. Holmes was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

447. Plaintiff Bruce B. Holmes suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, headaches, and sleeplessness.

PLAINTIFF SEDRICK IRVIN

448. Plaintiff Sedrick Irvin played three (3) NFL seasons from 1999 – 2001 for the Detroit Lions.

449. Throughout his career as a professional football player, Plaintiff Sedrick Irvin suffered multiple concussive hits and blows to the head.

450. Plaintiff Sedrick Irvin was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

451. Plaintiff Sedrick Irvin suffers from multiple past traumatic brain injuries with symptoms including but not limited to, headaches, blurred vision, and blackout episodes.

PLAINTIFF CHRIS JACKE

452. Plaintiff Chris Jacke played eleven (11) NFL seasons from 1989 – 1999 for the Green Bay Packers, Pittsburgh Steelers, Washington Redskins and Arizona Cardinals.

453. Throughout his career as a professional football player, Plaintiff Chris Jacke suffered multiple concussive hits and blows to the head.

454. Plaintiff Chris Jacke was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

455. Plaintiff Chris Jacke suffers from multiple past traumatic brain injuries with symptoms including but not limited to, headaches and migraines, blurred vision, memory loss, and mood swings.

PLAINTIFF ALFRED JENKINS

456. Plaintiff Alfred Jenkins played nine (9) NFL seasons from 1975 – 1983 for the Atlanta Falcons.

457. Throughout his career as a professional football player, Plaintiff Alfred Jenkins suffered multiple concussive hits and blows to the head.

458. Plaintiff Alfred Jenkins was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

459. Plaintiff Alfred Jenkins suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, headaches, and sleeplessness.

PLAINTIFF ANTHONY JOHNSON

460. Plaintiff Anthony Johnson played three (3) NFL seasons from 1989 – 1995 for the Washington Redskins, Kansas City Chiefs and San Diego Chargers.

461. Throughout his career as a professional football player, Plaintiff Anthony Johnson suffered multiple concussive hits and blows to the head.

462. Plaintiff Anthony Johnson was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

463. Plaintiff Anthony Johnson suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, headaches, sleeplessness, equilibrium imbalance, and anxiety.

PLAINTIFFS LARRY JOHNSON, SR. AND CATHY JOHNSON

464. Plaintiff Larry Johnson, Sr. played three (3) NFL seasons from 1977 – 1980 for the Cleveland Browns and Green Bay Packers.

465. Throughout his career as a professional football player, Plaintiff Larry Johnson, Sr. suffered multiple concussive hits and blows to the head.

466. Plaintiff Larry Johnson, Sr. was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

467. Plaintiff Larry Johnson, Sr. suffers from multiple past traumatic brain injuries with symptoms including but not limited to, headaches, dizziness, memory loss, motor and cognitive impairment, and mood swings.

468. Plaintiff's wife, Cathy Johnson, brings a claim for loss of consortium.

PLAINTIFFS SIDNEY JOHNSON AND CATRICE JOHNSON

469. Plaintiff Sidney Johnson played four (4) NFL seasons from 1988 – 1992 for the Kansas City Chiefs and Washington Redskins.

470. Throughout his career as a professional football player, Plaintiff Sidney Johnson suffered multiple concussive hits and blows to the head.

471. Plaintiff Sidney Johnson was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed

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

472. Plaintiff Sidney Johnson suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, emotional outbursts, and mood swings.

473. Plaintiff's wife, Catrice Johnson, brings a claim for loss of consortium.

PLAINTIFFS JOSEPH BRIAN JOHNSTON AND MES JOHNSTON

474. Plaintiff Joseph Brian Johnston played three (3) NFL seasons from 1985 – 1987 for the New York Giants.

475. Throughout his career as a professional football player, Plaintiff Joseph Brian Johnston suffered multiple concussive hits and blows to the head.

476. Plaintiff Joseph Brian Johnston was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

477. Plaintiff Joseph Brian Johnston suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, difficulty concentrating, and ringing of the ears.

478. Plaintiff's wife, Mes Johnston, brings a claim for loss of consortium.

PLAINTIFFS ROBERT J. KELLY, III AND EMILY KELLY

479. Plaintiff Robert J. Kelly, III played six (6) NFL seasons from 1997 – 2002 for the New Orleans Saints and New England Patriots.

480. Throughout his career as a professional football player, Plaintiff Robert J. Kelly, III suffered multiple concussive hits and blows to the head.

481. Plaintiff Robert J. Kelly, III was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

482. Plaintiff Robert J. Kelly, III suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, headaches, sleeplessness, difficulty concentrating, and depression.

483. Plaintiff's wife, Emily Kelly, brings a claim for loss of consortium.

PLAINTIFF ALLAN KENNEDY

484. Plaintiff Allan Kennedy played five (5) NFL seasons from 1981 – 1985 for the Washington Redskins and San Francisco 49ers.

485. Throughout his career as a professional football player, Plaintiff Allan Kennedy suffered multiple concussive hits and blows to the head.

486. Plaintiff Allan Kennedy was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

487. Plaintiff Allan Kennedy suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, slurred speech, and headaches.

PLAINTIFFS ED KING AND ANGELA GWEN KING

488. Plaintiff Ed King played seven (7) NFL seasons from 1991 – 1997 for the Cleveland Browns, Green Bay Packers and New Orleans Saints.

489. Throughout his career as a professional football player, Plaintiff Ed King suffered multiple concussive hits and blows to the head.

490. Plaintiff Ed King was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

491. Plaintiff Ed King suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, headaches, mood swings, and difficulty concentrating.

492. Plaintiff's wife, Angela Gwen King, brings a claim for loss of consortium.

PLAINTIFFS JEVON LANGFORD AND JAYNA LANGFORD

493. Plaintiff Jevon Langford played six (6) NFL seasons from 1996 – 2001 for the Cincinnati Bengals.

494. Throughout his career as a professional football player, Plaintiff Jevon Langford suffered multiple concussive hits and blows to the head.

495. Plaintiff Jevon Langford was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

496. Plaintiff Jevon Langford suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, mood swings, headaches, and sleeplessness.

497. Plaintiff's wife, Jayna Langford, brings a claim for loss of consortium.

PLAINTIFF ROBERT L. LAVETTE, JR.

498. Plaintiff Robert L. Lavette, Jr. played four (4) NFL seasons from 1985 – 1988 for the Dallas Cowboys, Philadelphia Eagles and Atlanta Falcons.

499. Throughout his career as a professional football player, Plaintiff Robert L. Lavette, Jr. suffered multiple concussive hits and blows to the head.

500. Plaintiff Robert L. Lavette, Jr. was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

501. Plaintiff Robert L. Lavette, Jr. suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, headaches, dizziness, and sleeplessness.

PLAINTIFFS KEVIN LEE AND NICOLE LEE

502. Plaintiff Kevin Lee played three (3) NFL seasons from 1994 – 1996 for the New England Patriots and San Francisco 49ers.

503. Throughout his career as a professional football player, Plaintiff Kevin Lee suffered multiple concussive hits and blows to the head.

504. Plaintiff Kevin Lee was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

505. Plaintiff Kevin Lee suffers from multiple past traumatic brain injuries with symptoms including but not limited to, headaches, difficulty concentrating, and sleeplessness.

506. Plaintiff's wife, Nicole Lee, brings a claim for loss of consortium.

PLAINTIFFS STEVE LUKE AND LORI LUKE

507. Plaintiff Steve Luke played six (6) NFL seasons from 1975 – 1981 for the Green Bay Packers and Atlanta Falcons.

508. Throughout his career as a professional football player, Plaintiff Steve Luke suffered multiple concussive hits and blows to the head.

509. Plaintiff Steve Luke was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

510. Plaintiff Steve Luke suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, difficulty concentrating, and cognitive impairment.

511. Plaintiff's wife, Lori Luke, brings a claim for loss of consortium.

PLAINTIFFS DON MAJKOWSKI AND KELLY MAJKOWSKI

512. Plaintiff Don Majkowski played ten (10) NFL seasons from 1987 – 1996 for the Green Bay Packers, Indianapolis Colts and Detroit Lions.

513. Throughout his career as a professional football player, Plaintiff Don Majkowski suffered multiple concussive hits and blows to the head.

514. Plaintiff Don Majkowski was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

515. Plaintiff Don Majkowski suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, sleeplessness, and difficulty concentrating.

516. Plaintiff's wife, Kelly Majkowski, brings a claim for loss of consortium.

PLAINTIFFS DEWEY MCCLAIN AND LINDA MCCLAIN

517. Plaintiff Dewey McClain played five (5) NFL seasons from 1976 – 1980 for the Atlanta Falcons.

518. Throughout his career as a professional football player, Plaintiff Dewey McClain suffered multiple concussive hits and blows to the head.

519. Plaintiff Dewey McClain was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

520. Plaintiff Dewey McClain suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, headaches, and sleeplessness.

521. Plaintiff's wife, Linda McClain, brings a claim for loss of consortium.

PLAINTIFFS DANA MCLEMORE AND KARYN MCLEMORE

522. Plaintiff Dana McLemore played six (6) NFL seasons from 1982 – 1987 for the San Francisco 49ers and New Orleans Saints.

523. Throughout his career as a professional football player, Plaintiff Dana McLemore suffered multiple concussive hits and blows to the head.

524. Plaintiff Dana McLemore was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

525. Plaintiff Dana McLemore suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, headaches, and dizziness.

526. Plaintiff's wife, Karyn McLemore, brings a claim for loss of consortium.

PLAINTIFF ROBERT A. MICHO

527. Plaintiff Robert A. Micho played three (3) NFL seasons from 1984 – 1989 for the San Diego Chargers, Denver Broncos and Washington Redskins.

528. Throughout his career as a professional football player, Plaintiff Robert A. Micho suffered multiple concussive hits and blows to the head.

529. Plaintiff Robert A. Micho was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

530. Plaintiff Robert A. Micho suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, mood swings, and difficulty concentrating.

PLAINTIFFS JERMAINE MILES AND CASSANDRA MILES

531. Plaintiff Jermaine Miles played two (2) NFL seasons in 1997 and 2001 for the New England Patriots and New Orleans Saints.

532. Throughout his career as a professional football player, Plaintiff Jermaine Miles suffered multiple concussive hits and blows to the head.

533. Plaintiff Jermaine Miles was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

534. Plaintiff Jermaine Miles suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, difficulty concentrating, headaches, mood swings, and anxiety.

535. Plaintiff's wife, Cassandra Miles, brings a claim for loss of consortium.

PLAINTIFFS CALVIN MILLER AND DEE MILLER

536. Plaintiff Calvin Miller played two (2) NFL seasons from 1979 – 1980 for the New York Giants and Atlanta Falcons.

537. Throughout his career as a professional football player, Plaintiff Calvin Miller suffered multiple concussive hits and blows to the head.

538. Plaintiff Calvin Miller was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

539. Plaintiff Calvin Miller suffers from multiple past traumatic brain injuries with symptoms including but not limited to, headaches, sleeplessness, and mood swings.

540. Plaintiff's wife, Dee Miller, brings a claim for loss of consortium.

PLAINTIFFS SHANNON L. MITCHELL AND FRENCHIE MITCHELL

541. Plaintiff Shannon L. Mitchell played four (4) NFL seasons from 1994 – 1997 for the San Diego Chargers.

542. Throughout his career as a professional football player, Plaintiff Shannon L. Mitchell suffered multiple concussive hits and blows to the head.

543. Plaintiff Shannon L. Mitchell was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

544. Plaintiff Shannon L. Mitchell suffers from multiple past traumatic brain injuries with symptoms including but not limited to, headaches, sleeplessness, anxiety, and depression.

545. Plaintiff's wife, Frenchie Mitchell, brings a claim for loss of consortium.

PLAINTIFFS STEVON MOORE AND JONDENA MOORE

546. Plaintiff Stevon Moore played ten (10) NFL seasons from 1990 – 1991 for the Miami Dolphins, Cleveland Browns and Baltimore Ravens.

547. Throughout his career as a professional football player, Plaintiff Stevon Moore suffered multiple concussive hits and blows to the head.

548. Plaintiff Stevon Moore was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

549. Plaintiff Stevon Moore suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, headaches, equilibrium imbalance, and sleeplessness.

550. Plaintiff's wife, Jondena Moore, brings a claim for loss of consortium.

PLAINTIFF ZEKE MOWATT

551. Plaintiff Zeke Mowatt played eight (8) NFL seasons from 1983 – 1991 for the New York Giants and New England Patriots.

552. Throughout his career as a professional football player, Plaintiff Zeke Mowatt suffered multiple concussive hits and blows to the head.

553. Plaintiff Zeke Mowatt was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed

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

554. Plaintiff Zeke Mowatt suffers from multiple past traumatic brain injuries with symptoms including but not limited to, headaches, difficulty concentrating, and sleeplessness.

PLAINTIFFS HUBERT OLIVER AND ROSALYN WADE

555. Plaintiff Hubert Oliver played five (5) NFL seasons from 1981 – 1986 for the Philadelphia Eagles, Baltimore Colts and Houston Oilers.

556. Throughout his career as a professional football player, Plaintiff Hubert Oliver suffered multiple concussive hits and blows to the head.

557. Plaintiff Hubert Oliver was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

558. Plaintiff Hubert Oliver suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, headaches, and sleeplessness.

559. Plaintiff's wife, Rosalyn Wade, brings a claim for loss of consortium.

PLAINTIFF BRIAN O'NEAL

560. Plaintiff Brian O'Neal played three (3) NFL seasons from 1994 – 1996 for the Philadelphia Eagles, Carolina Panthers and San Francisco 49ers.

561. Throughout his career as a professional football player, Plaintiff Brian O'Neal suffered multiple concussive hits and blows to the head.

562. Plaintiff Brian O'Neal was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

563. Plaintiff Brian O'Neal suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, headaches, and sleeplessness.

PLAINTIFF STERLING PALMER

564. Plaintiff Sterling Palmer played five (5) NFL seasons from 1993 – 1996, and 1999, for the Washington Redskins and New England Patriots.

565. Throughout his career as a professional football player, Plaintiff Sterling Palmer suffered multiple concussive hits and blows to the head.

566. Plaintiff Sterling Palmer was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

567. Plaintiff Sterling Palmer suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, headaches, difficulty concentrating, and cognitive impairment.

PLAINTIFFS ROOSEVELT PATTERSON AND KIKI G. PATTERSON

568. Plaintiff Roosevelt Patterson played one (1) NFL season in 1994 for the Los Angeles Raiders and Los Angeles Rams.

569. Throughout his career as a professional football player, Plaintiff Roosevelt Patterson suffered multiple concussive hits and blows to the head.

570. Plaintiff Roosevelt Patterson was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

571. Plaintiff Roosevelt Patterson suffers from multiple past traumatic brain injuries with symptoms including but not limited to, headaches, blurred vision, dizziness, and mood swings.

572. Plaintiff's wife, Kiki G. Patterson, brings a claim for loss of consortium.

PLAINTIFFS BRETT PERRIMAN AND LAUNDRIA PERRIMAN

573. Plaintiff Brett Perriman played ten (10) NFL seasons from 1988 – 1997 for the New Orleans Saints, Detroit Lions, Kansas City Chiefs and Miami Dolphins.

574. Throughout his career as a professional football player, Plaintiff Brett Perriman suffered multiple concussive hits and blows to the head.

575. Plaintiff Brett Perriman was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

576. Plaintiff Brett Perriman suffers from multiple past traumatic brain injuries with symptoms including but not limited to, headaches, memory loss, sleeplessness, and vision impairment.

577. Plaintiff's wife, Laundria Perriman, brings a claim for loss of consortium.

PLAINTIFFS KEITH PONDER AND JANET PONDER

578. Plaintiff Keith Ponder played three (3) seasons from 1977 – 1979 for the Dallas Cowboys, New England Patriots and Houston Oilers.

579. Throughout his career as a professional football player, Plaintiff Keith Ponder suffered multiple concussive hits and blows to the head.

580. Plaintiff Keith Ponder was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

581. Plaintiff Keith Ponder suffers from multiple past traumatic brain injuries with symptoms including but not limited to, headaches, blurred vision, and sleeplessness.

582. Plaintiff's wife, Janet Ponder, brings a claim for loss of consortium.

PLAINTIFF STANLEY PRITCHETT, JR.

583. Plaintiff Stanley Pritchett, Jr. played nine (9) NFL seasons from 1996 – 2004 for the Miami Dolphins, Philadelphia Eagles, Chicago Bears and Atlanta Falcons.

584. Throughout his career as a professional football player, Plaintiff Stanley Pritchett, Jr. suffered multiple concussive hits and blows to the head.

585. Plaintiff Stanley Pritchett, Jr. was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

586. Plaintiff Stanley Pritchett, Jr. suffers from multiple past traumatic brain injuries with symptoms including but not limited to, headaches, dizziness, and sleeplessness.

PLAINTIFF WESLEY PRITCHETT

587. Plaintiff Wesley Pritchett played one (1) NFL season in 1991 for the Atlanta Falcons.

588. Throughout his career as a professional football player, Plaintiff Wesley Pritchett suffered multiple concussive hits and blows to the head.

589. Plaintiff Wesley Pritchett was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

590. Plaintiff Wesley Pritchett suffers from multiple past traumatic brain injuries with symptoms including but not limited to, headaches, dizziness, and sleeplessness.

PLAINTIFFS GARY REASONS AND TERRI REASONS

591. Plaintiff Gary Reasons played nine (9) NFL seasons from 1984 – 1992 for the New York Giants and Cincinnati Bengals.

592. Throughout his career as a professional football player, Plaintiff Gary Reasons suffered multiple concussive hits and blows to the head.

593. Plaintiff Gary Reasons was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

594. Plaintiff Gary Reasons suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, headaches, difficulty concentrating, and sleeplessness.

595. Plaintiff's wife, Terri Reasons, brings a claim for loss of consortium.

PLAINTIFF KENNETH REAVES

596. Plaintiff Kenneth Reaves played twelve (12) NFL seasons from 1966 – 1977 for the Atlanta Falcons, New Orleans Saints and St. Louis Cardinals.

597. Throughout his career as a professional football player, Plaintiff Kenneth Reaves suffered multiple concussive hits and blows to the head.

598. Plaintiff Kenneth Reaves was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

599. Plaintiff Kenneth Reaves suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, headaches, and difficulty concentrating.

PLAINTIFF ALPETTE RICHARDSON

600. Plaintiff Alpette Richardson played six (6) NFL seasons from 1980 – 1985 for the Atlanta Falcons.

601. Throughout his career as a professional football player, Plaintiff Alpette Richardson suffered multiple concussive hits and blows to the head.

602. Plaintiff Alpette Richardson was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

603. Plaintiff Alpette Richardson suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, headaches, mood swings, and sleeplessness.

PLAINTIFF ROBERT L. ROBERTSON, JR. AND NNEKA ROBERTSON

604. Plaintiff Robert L. Robertson, Jr. played two (2) NFL seasons from 1998 – 1999 for the Baltimore Ravens.

605. Throughout his career as a professional football player, Plaintiff Robert L. Robertson, Jr. suffered multiple concussive hits and blows to the head.

606. Plaintiff Robert L. Robertson, Jr. was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

607. Plaintiff Robert L. Robertson, Jr. suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss and headaches.

608. Plaintiff's wife, Nneka Robertson, brings a claim for loss of consortium.

PLAINTIFFS JIM ROMANO AND BRIGITTE ROMANO

609. Plaintiff Jim Romano played five (5) NFL seasons from 1982 – 1986 for the Los Angeles Raiders, Houston Oilers and New England Patriots.

610. Throughout his career as a professional football player, Plaintiff Jim Romano suffered multiple concussive hits and blows to the head.

611. Plaintiff Jim Romano was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

612. Plaintiff Jim Romano suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, headaches, blurred vision, sleeplessness, and depression.

613. Plaintiff's wife, Brigitte Romano, brings a claim for loss of consortium.

PLAINTIFFS JOHNNY RUTLEDGE AND GIA RUTLEDGE

614. Plaintiff Johnny Rutledge played five (5) NFL seasons from 1999 – 2003 for the Arizona Cardinals, Denver Broncos and Baltimore Ravens.

615. Throughout his career as a professional football player, Plaintiff Johnny Rutledge suffered multiple concussive hits and blows to the head.

616. Plaintiff Johnny Rutledge was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

617. Plaintiff Johnny Rutledge suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, headaches, and mood swings.

618. Plaintiff's wife, Gia Rutledge, brings a claim for loss of consortium.

PLAINTIFF O.J. SANTIAGO

619. Plaintiff O.J. Santiago played six (6) NFL seasons from 1997 – 2003 for the Atlanta Falcons, Dallas Cowboys, Cleveland Browns and Oakland Raiders.

620. Throughout his career as a professional football player, Plaintiff O.J. Santiago suffered multiple concussive hits and blows to the head.

621. Plaintiff O.J. Santiago was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

622. Plaintiff O.J. Santiago suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, headaches, and sleeplessness.

PLAINTIFF JOHN W. SAWYER

623. Plaintiff John W. Sawyer played eleven (11) NFL seasons from 1975 – 1986 for the Houston Oilers, Seattle Seahawks, Washington Redskins and Denver Broncos.

624. Throughout his career as a professional football player, Plaintiff John W. Sawyer suffered multiple concussive hits and blows to the head.

625. Plaintiff John W. Sawyer was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

626. Plaintiff John W. Sawyer suffers from multiple past traumatic brain injuries with symptoms including but not limited to, headaches, dizziness, and memory loss.

PLAINTIFFS LINDSAY SCOTT AND RONDA SCOTT

627. Plaintiff Lindsay Scott played four (4) NFL seasons from 1982 – 1986 for the New Orleans Saints.

628. Throughout his career as a professional football player, Plaintiff Lindsay Scott suffered multiple concussive hits and blows to the head.

629. Plaintiff Lindsay Scott was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

630. Plaintiff Lindsay Scott suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, headaches, mood swings, and personality changes.

631. Plaintiff's wife, Ronda Scott, brings a claim for loss of consortium.

PLAINTIFFS CHRISTOPHER SHELLING AND KAREN RAY

632. Plaintiff Christopher Shelling played three (3) NFL seasons from 1995 – 1997 for the Cincinnati Bengals and Atlanta Falcons.

633. Throughout his career as a professional football player, Plaintiff Christopher Shelling suffered multiple concussive hits and blows to the head.

634. Plaintiff Christopher Shelling was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

635. Plaintiff Christopher Shelling suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, headaches, and irritability.

636. Plaintiff's wife, Karen Ray, brings a claim for loss of consortium.

PLAINTIFF FERNANDO SMITH

637. Plaintiff Fernando Smith played eight (8) NFL seasons from 1994 – 2002 for the Minnesota Vikings, Jacksonville Jaguars, Baltimore Ravens, St. Louis Rams and Carolina Panthers.

638. Throughout his career as a professional football player, Plaintiff Fernando Smith suffered multiple concussive hits and blows to the head.

639. Plaintiff Fernando Smith was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

640. Plaintiff Fernando Smith suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, headaches, and sleeplessness.

PLAINTIFFS RICO SMITH AND GUIMAY SMITH

641. Plaintiff Rico Smith played five (5) NFL seasons from 1992 – 1996 for the Cleveland Browns and New York Jets.

642. Throughout his career as a professional football player, Plaintiff Rico Smith suffered multiple concussive hits and blows to the head.

643. Plaintiff Rico Smith was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

644. Plaintiff Rico Smith suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, headaches, vision impairment, and sleeplessness.

645. Plaintiff's wife, Guimay Smith, brings a claim for loss of consortium.

PLAINTIFF RALPH STATEN, JR.

646. Plaintiff Ralph Staten, Jr. played two (2) NFL seasons from 1997 – 1998 for the Baltimore Ravens.

647. Throughout his career as a professional football player, Plaintiff Ralph Staten, Jr. suffered multiple concussive hits and blows to the head.

648. Plaintiff Ralph Staten, Jr. was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

649. Plaintiff Ralph Staten, Jr. suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, headaches, and sleeplessness.

PLAINTIFFS TERRY W. TAUSCH AND ELIZABETH TAUSCH

650. Plaintiff Terry W. Tausch played eight (8) NFL seasons from 1982 – 1989 for the Minnesota Vikings and San Francisco 49ers.

651. Throughout his career as a professional football player, Plaintiff Terry W. Tausch suffered multiple concussive hits and blows to the head.

652. Plaintiff Terry W. Tausch was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

653. Plaintiff Terry W. Tausch suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, headaches, and irritability.

654. Plaintiff's wife, Elizabeth Tausch, brings a claim for loss of consortium.

PLAINTIFF GREGORY TAYLOR

655. Plaintiff Gregory Taylor played one (1) NFL season in 1991 for the New York Giants.

656. Throughout his career as a professional football player, Plaintiff Gregory Taylor suffered multiple concussive hits and blows to the head.

657. Plaintiff Gregory Taylor was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

658. Plaintiff Gregory Taylor suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, headaches, and sleeplessness.

PLAINTIFF ADALIUS DONQUAIL THOMAS

659. Plaintiff Adalius Donquail Thomas played ten (10) NFL seasons from 2000 – 2009 for the Baltimore Ravens and New England Patriots.

660. Throughout his career as a professional football player, Plaintiff Adalius Donquail Thomas suffered multiple concussive hits and blows to the head.

661. Plaintiff Adalius Donquail Thomas was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

662. Plaintiff Adalius Donquail Thomas suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, headaches, and sleeplessness.

PLAINTIFF LAVALE THOMAS

663. Plaintiff Lavale Thomas played two (2) NFL seasons from 1986 – 1990 for the Kansas City Chiefs and Green Bay Packers.

664. Throughout his career as a professional football player, Plaintiff Lavale Thomas suffered multiple concussive hits and blows to the head.

665. Plaintiff Lavale Thomas was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

666. Plaintiff Lavale Thomas suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, headaches, and mood swings.

PLAINTIFFS ERNEST THOMPSON
AND CASSANDRA THOMPSON

667. Plaintiff Ernest Thompson played two (2) NFL seasons from 1991 - 1993 for the Los Angeles Rams and Kansas City Chiefs.

668. Throughout his career as a professional football player, Plaintiff Ernest Thompson suffered multiple concussive hits and blows to the head.

669. Plaintiff Ernest Thompson was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

670. Plaintiff Ernest Thompson suffers from multiple past traumatic brain injuries with symptoms including but not limited to, headaches and mood swings.

671. Plaintiff's wife, Cassandra Thompson, brings a claim for loss of consortium.

PLAINTIFFS JEFFERY E. TOOTLE AND LADONNA TOOTLE

672. Plaintiff Jeffery E. Tootle played two (2) NFL seasons from 1985 - 1987 for the Indianapolis Colts and New York Giants.

673. Throughout his career as a professional football player, Plaintiff Jeffery E. Toole suffered multiple concussive hits and blows to the head.

674. Plaintiff Jeffery E. Tootle was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

675. Plaintiff Jeffery E. Tootle suffers from multiple past traumatic brain injuries with symptoms including but not limited to, headaches, vision impairment, difficulty concentrating, and mood swings.

676. Plaintiff's wife, LaDonna Tootle, brings a claim for loss of consortium.

PLAINTIFFS JESSIE TUGGLE AND DUJUAN TUGGLE

677. Plaintiff Jessie Tuggle played fourteen (14) NFL seasons from 1987 - 2000 for the Atlanta Falcons.

678. Throughout his career as a professional football player, Plaintiff Jessie Tuggle suffered multiple concussive hits and blows to the head.

679. Plaintiff Jessie Tuggle was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

680. Plaintiff Jessie Tuggle suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss, difficulty concentrating, vision impairment, and depression.

681. Plaintiff's wife, DuJuan Tuggle, brings a claim for loss of consortium.

PLAINTIFF SAMMY WALKER

682. Plaintiff Sammy Walker played four (4) NFL seasons from 1991 - 1994 for the Pittsburgh Steelers, Kansas City Chiefs and Green Bay Packers.

683. Throughout his career as a professional football player, Plaintiff Sammy Walker suffered multiple concussive hits and blows to the head.

684. Plaintiff Sammy Walker was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed

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

685. Plaintiff Sammy Walker suffers from multiple past traumatic brain injuries with symptoms including but not limited to, headaches, sleeplessness, and depression.

PLAINTIFFS MIKE L. WASHINGTON AND VERONICA WASHINGTON

686. Plaintiff Mike L. Washington played ten (10) NFL seasons from 1975 - 1984 for the Baltimore Colts and Tampa Bay Buccaneers.

687. Throughout his career as a professional football player, Plaintiff Mike L. Washington suffered multiple concussive hits and blows to the head.

688. Plaintiff Mike L. Washington was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

689. Plaintiff Mike L. Washington suffers from multiple past traumatic brain injuries with symptoms including but not limited to, memory loss and headaches.

690. Plaintiff's wife, Veronica Washington, brings a claim for loss of consortium.

PLAINTIFF THEODORE WATTS

691. Plaintiff Theodore Watts played six (6) NFL seasons from 1981 - 1987 for the Oakland Raiders, Los Angeles Raiders, New York Giants and San Diego Chargers

692. Throughout his career as a professional football player, Plaintiff Theodore Watts suffered multiple concussive hits and blows to the head.

693. Plaintiff Theodore Watts was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

694. Plaintiff Theodore Watts suffers from multiple past traumatic brain injuries with symptoms including but not limited to, headaches, memory loss, and sleeplessness.

PLAINTIFF PATRICK WHITE

695. Plaintiff Patrick White played one (1) NFL season in 2009 for the Miami Dolphins.

696. Throughout his career as a professional football player, Plaintiff Patrick White suffered multiple concussive hits and blows to the head.

697. Plaintiff Patrick White was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

698. Plaintiff Patrick White suffers from multiple past traumatic brain injuries with symptoms including but not limited to, headaches, sleeplessness, and mood swings.

PLAINTIFF JAMES WHITLEY

699. Plaintiff James Whitley played three (3) NFL seasons from 2002 - 2004 for the St. Louis Rams, Green Bay Packers and Carolina Panthers.

700. Throughout his career as a professional football player, Plaintiff James Whitley suffered multiple concussive hits and blows to the head.

701. Plaintiff James Whitley was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

702. Plaintiff James Whitley suffers from multiple past traumatic brain injuries with symptoms including but not limited to, headaches, memory loss, impaired vision, and mood swings.

PLAINTIFFS KEVIN WHITLEY AND STAR WHITLEY

703. Plaintiff Kevin Whitley played one (1) NFL season in 1992 for the New England Patriots.

704. Throughout his career as a professional football player, Plaintiff Kevin Whitley suffered multiple concussive hits and blows to the head.

705. Plaintiff Kevin Whitley was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

706. Plaintiff Kevin Whitley suffers from multiple past traumatic brain injuries with symptoms including but not limited to, headaches and difficulty concentrating.

707. Plaintiff's wife, Star Whitley, brings a claim for loss of consortium.

PLAINTIFFS KEVIN WILLHITE AND KAREN WILLHITE

708. Plaintiff Kevin Willhite played one (1) NFL season from 1987 - 1988 for the Green Bay Packers.

709. Throughout his career as a professional football player, Plaintiff Kevin Willhite suffered multiple concussive hits and blows to the head.

710. Plaintiff Kevin Willhite was not warned by Defendants of the risk of long-term injury due to football-related concussions or that the League-managed equipment did not protect him from such injury. This was a substantial factor in causing his current injuries.

711. Plaintiff Kevin Willhite suffers from multiple past traumatic brain injuries with symptoms including but not limited to, headaches, memory loss, and depression.

712. Plaintiff's wife, Karen Willhite, brings a claim for loss of consortium.

COUNT I
NEGLIGENCE

713. Plaintiffs incorporate by reference all facts set forth in the preceding paragraphs and further allege on information and belief as follows.

714. Defendants, as purveyors of safety rules for the League, owed Plaintiffs a duty to use reasonable care in researching, studying and/or examining

the dangers and risks of head injuries and/or concussions to NFL players; to inform and warn him of such risks and to effectuate reasonable league policies; and/or take other reasonable action to minimize the risks of head injuries.

715. At all times relevant hereto, Defendants negligently performed such duties by failing to adequately study, warn and/or implement reasonable rules and regulations to minimize traumatic brain injuries to its players, including Plaintiffs herein.

716. Defendants knew or should have known that its policies, rules and regulations in place were not reasonably sufficient to minimize traumatic brain injuries and that Plaintiffs' injuries were foreseeable.

717. Defendants affirmatively and voluntarily established the MTBI Committee, ostensibly to examine the dangers and consequences of head injuries to NFL players, to report on its findings, to provide information and guidance from its research and studies concerning concussions to teams and players, and to make recommendations to lessen the risks of concussions. Defendants are responsible for the staffing and conduct of the MTBI Committee.

718. Defendants failed to use reasonable care in the manner in which it created the MTBI Committee and failed to reasonable appoint qualified physicians to head the Committee.

719. Defendants, failed to use reasonable care in researching, studying and/or examining the risks of head injuries and/or concussions in professional football. Defendants downplayed and in many cases denied both the severity of head injuries and the clear link between concussions and brain damage, thereby breaching its duty to its players, including Plaintiffs herein.

720. Defendants failed to inform, warn and/or advise its players, and/or misinformed them of the risks and complications inherent in sustaining concussions, thereby breaching its duty to its players, including Plaintiffs herein.

721. Defendants were further negligent in the following respects:

- In failing to use reasonable care in overseeing, controlling and/or regulating policies and procedures of the League so as to minimize the risk of head injuries and/or concussions;
- In failing to use reasonable care in the research and/or investigation of the concussion issue;
- In failing to appoint a qualified physician or panel of physicians to head Defendants' MTBI committee;
- In placing a physician in charge of the committee whose primary motive was to appease the NFL rather than to report accurately;

- In disregarding independent scientific studies which showed the risks of head injuries and/or concussions to NFL players' health;
- In failing to acknowledge, either publicly or to their players, the clear link between concussions and brain injuries being suffered by their players;
- In failing to acknowledge, either publically or to their players, the linkage between playing football and long-term brain injuries;
- In failing to make and/or timely make necessary league policy changes as it pertains to intentional hits to the head, hits to the head of a defenseless player, helmet to helmet hits, and concussions in general;
- In publishing misleading and erroneous findings regarding hits to the head and NFL head injuries;
- In failing to issue a timely warning, through a concussion pamphlet or other means, to the players concerning the causal link between concussions and later life cognitive decline;
- In issuing misinformation and purposefully attempting to mislead their players through the concussion pamphlet which they issued in August 2007;
- In collecting and reporting upon data that was "infected" and/or not reliable;
- In causing, by and through their negligent conduct and omissions, an increased risk of harm to their players;
- In breaching their duty to ensure that the equipment it licensed and approved was of the highest possible quality and sufficient to protect the NFL players, including Plaintiffs, from the risk of concussive brain injuries;

- In failing to provide competent information to its teams, players, coaches, trainers and medical personnel with respect to the significance of head injuries and/or concussions, their symptoms and necessary and/or proper treatment of same; and
- In creating a “culture” within the NFL in which concussions and their devastating effects would run rampant.

722. Defendants failed to inform, warn and/or advise its players, and/or misinformed them of the risks and complications inherent in sustaining concussions, thereby breaching its duty to its players, including Plaintiffs herein.

723. As a direct and proximate result of the Defendants negligent acts and omissions as aforesaid, Plaintiffs suffered serious injury, including but not limited to brain damage, with a resultant loss therefrom.

724. That by reason of the foregoing negligence on the part of Defendants, Plaintiffs believe that their aforesaid injuries are permanent and that he will continue to suffer from the effects of their aforesaid injuries, including but not limited to continuous pain and suffering and severe emotional distress.

725. That by reason of the foregoing, Plaintiffs have and will be required in the future to obtain medical aid and attention, with a resultant cost therefrom.

726. That by reason of the foregoing, Plaintiffs may suffer a loss of employment opportunity in the future with a resultant loss therefrom.

727. As a direct and proximate result of Defendants' negligent acts and omissions, Plaintiffs suffered and will continue to suffer substantial injuries, and economic and non-economic damages.

COUNT II
FRAUD

728. Defendants failed to inform, warn and/or advise its players, and/or misinformed them of the risks and complications inherent in sustaining concussions, thereby breaching its duty to its players, including Plaintiffs herein.

729. Plaintiffs incorporate by reference all facts set forth in the preceding paragraphs and further allege on information and belief as follows.

730. The NFL materially misrepresented the risks faced by Plaintiffs related to head injuries. Defendants' MTBI Committee, through misleading public statements, published articles and the concussion pamphlet issued to the players, downplayed known long-term risks of concussions to NFL players.

731. Material misrepresentations were made by members of Defendants' Committee on multiple occasions, including but not limited to testimony given at congressional hearings and the "informational" pamphlet which they issued to players.

732. The material misrepresentations include the NFL's remarks that Plaintiffs and other players were not at an increased risk of head injury if they returned too soon to an NFL game or training session after suffering a head injury.

733. Defendants' material misrepresentations also included the NFL's criticism of legitimate scientific studies which illustrated the dangers and risks of head injuries and the long term effects of concussions.

734. Defendants' material misrepresentations, through its MTBI Committee, denied a link between concussions and CTE.

735. Defendants had actual knowledge of the misleading nature of these statements when they were made.

736. Defendants had actual knowledge that Plaintiffs and others would rely on these misrepresentations.

737. Plaintiffs relied on these misrepresentations when playing in the NFL. Had Plaintiffs known the risks to their health, they would not have agreed to jeopardize their health.

738. As a direct and proximate result of Defendants' fraudulent conduct, Plaintiffs have suffered physical injury, including, but not limited to, memory and cognitive problems, and economic losses.

739. As a direct and proximate result of the Defendants' fraudulent conduct, Plaintiffs have suffered and will continue to suffer substantial injuries, and economic and non-economic damages.

COUNT III
FRAUDULENT CONCEALMENT

740. Defendants failed to inform, warn and/or advise its players, and/or misinformed them of the risks and complications inherent in sustaining concussions, thereby breaching its duty to its players, including Plaintiffs herein.

741. Plaintiffs incorporate by reference all facts set forth in the preceding paragraphs and further allege on information and belief as follows.

742. Defendants' MTBI Committee knowingly and fraudulently concealed the risks of head injuries to Plaintiffs, and the risk to them if they returned to the playing field before making a proper recovery from their head injuries.

743. Defendants' MTBI Committee published articles and the concussion pamphlet issued to players, therein affirmatively concealed and downplaying known long-term risks of concussions to NFL players.

744. The concussion pamphlet created player reliance. The NFL stated that "[w]e want to make sure all N.F.L. players ... are fully informed and take

advantage of the most up to date information and resources as we continue to study the long-term impact on concussions.”

745. Further concealment of material information occurred in January 2010. Dr. Casson provided oral and written testimony at the January 2010 congressional hearings. He continued to deny the validity of other studies.

746. Defendants failed to acknowledge, either publicly or to its players, the clear link between concussions and brain injuries being suffered by NFL players.

747. Defendants failed to acknowledge, either publicly or to its players, the linkage between playing football and long-term brain injuries.

748. Defendants willfully concealed this information from Plaintiffs in order to prevent negative publicity and increased scrutiny of their medical practices.

749. Defendants knew that Plaintiffs and other NFL players would rely on the inaccurate information provided by the NFL.

750. Plaintiffs relied on this inaccurate information during their NFL career.

751. As a direct and proximate result of Defendants' fraudulent conduct, Plaintiffs have suffered physical injury, including, but not limited to, memory and cognitive problems, and economic losses.

752. As a direct and proximate result of the Defendants' willful concealment, Plaintiffs have suffered and will continue to suffer substantial injuries, and economic and non-economic damages.

COUNT IV
NEGLIGENT MISREPRESENTATION

753. Defendants failed to inform, warn and/or advise its players, and/or misinformed them of the risks and complications inherent in sustaining concussions, thereby breaching its duty to its players, including Plaintiffs herein.

754. Plaintiffs incorporate by reference all facts set forth in the preceding paragraphs and further allege on information and belief as follows.

755. The NFL misrepresented the dangers that NFL players faced in returning to play too quickly after sustaining a head injury. Defendants' MTBI Committee, through public statements which it knew or should have known were misleading, published articles and issued the concussion pamphlet to its players, and downplayed the long-term risks of concussions to NFL players.

756. Material misrepresentations were made by members of the NFL's committee on multiple occasions, including but not limited to testimony at congressional hearings and the "informational" pamphlet issued to players.

757. The misrepresentations included the NFL's remarks that Plaintiffs and other NFL players were not at an increased risk of head injury if they returned too soon to play or training session after suffering a head injury.

758. Defendants' material misrepresentations also include the NFL's criticism of legitimate scientific studies that illustrated the dangers and risks of head injuries.

759. Defendants made these misrepresentations and actively concealed adverse information at a time when they knew, or should have known, because of their superior position of knowledge, that Plaintiffs faced health problems if he were to return to a game too soon after suffering brain trauma.

760. Defendants knew or should have known the misleading nature of these statements when they were made.

761. Defendants made misrepresentations and actively concealed information with the intention that Plaintiffs and other NFL players would rely on the misrepresentations or omissions in selecting their course of action.

762. As a direct and proximate result of the Defendants' fraudulent conduct, Plaintiffs have suffered physical injury, including, but not limited to, memory and cognitive problems, and economic losses.

763. As a direct and proximate result of the Defendants' willful concealment, Plaintiffs have suffered and will continue to suffer substantial injuries, and economic and non-economic damages.

COUNT V
LOSS OF CONSORTIUM

764. Defendants failed to inform, warn and/or advise its players, and/or misinformed them of the risks and complications inherent in sustaining concussions, thereby breaching its duty to its players, including Plaintiffs herein.

765. Plaintiffs incorporate by reference all facts set forth in the preceding paragraphs and further allege on information and belief as follows.

766. As a direct and proximate result of the aforementioned conduct of Defendants, and as a result of the injuries and damages to Plaintiffs herein, the wives of the Plaintiffs herein have been deprived of the love, companionship, comfort, affection, society, solace or moral support, protection, loss of consortium, and loss of physical assistance in the operation and maintenance of the home, of their husbands, and has thereby sustained, and will continue to sustain damages.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs pray for relief and judgment as follows:

- a. For past and future medical and incidental expenses, according to proof;
- b. Awarding to Plaintiffs past and future loss of earnings and/or earning capacity, according to proof;
- c. Awarding to Plaintiffs past and future general damages, including pain and suffering according to proof;
- d. Awarding to Plaintiffs' wives for loss of consortium, according to proof;
- e. Punitive damages as allowable by law;
- f. Awarding to Plaintiffs the costs of this action, including reasonable attorneys' fees; and
- g. Granting any and all such other and further relief as the Court deems necessary, just, and proper.

DEMAND FOR JURY TRIAL

Plaintiffs hereby request a trial by jury of all issues triable by jury.

DATED: May 2, 2012

Respectfully submitted,

/s/ Michael L. McGlamry

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