

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION	MDL No. 2323 No. 12-md-2323
THIS DOCUMENT RELATES TO: BRENT BOYD, <i>et al.</i> , <i>Plaintiffs</i> , v. NATIONAL FOOTBALL LEAGUE, <i>et al.</i> , <i>Defendants</i> .	CIVIL ACTION No. 12-cv-92

AMENDED COMPLAINT

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

BRENT BOYD, and GINA BOYD his wife,
ROBERT ABRAHAM, ANTHONY “TONY”
ADAMS, and DIANE ADAMS his wife,
MARGENE ADKINS, DAVID AHRENS, and
KAREN AHRENS his wife, SAMAJI AKILI,
FRED ANDERSON, and DARLA
ANDERSON his wife, GARRY “DONNY”
ANDERSON, RICHARD ANDERSON,
REIDEL ANTHONY, LIONEL ANTOINE,
HARVEY ARMSTRONG, and SHARON
ARMSTRONG his wife, MARK ARNESON,
and KRISTINE ARNESON his wife, PETER
ATHAS, MIKE AUGUSTYNIAK, JOHN
BANASZAK, and MARY BANASZAK his
wife, JEFF BARNES, and ANTHETHA
BARNES his wife, LEMUEL BARNEY, and
JACQUELINE BARNEY his wife, STEVE
BARTKOWSKI, and SANDEE
BARTKOWSKI his wife, MIKE BASS, and
ROSITA BASS his wife, DOUG BEAUDOIN,
and RENEE BEAUDOIN his wife, THOMAS
J. BEER, BILLY BELL, NICHOLAS BELL,
and TRISH BELL his wife, ROBERT BELL,
JR., and PATRICIA BELL his wife, ROBERT
BERRY, NICHOLAS BOLKOVAC, JAMES
BOWMAN, and TRACY BOWMAN his wife,
GREGORY BOYD, HENRY BRADLEY, and
TONYA BRADLEY his wife, MARC
BROWN, RAYMOND BROWN, and LINDA
BROWN his wife, NOAH BURROUGHS,
KENNETH BURROW, and NANCY
BURROW his wife, WILLIAM CAHILL,
JOHN CAPPELLETTI, and BETTY ANNE
CAPPELLETTI his wife, ROGER CARR, and
UNDINE CARR his wife, ALLEN CARTER,
and CHERYL CHANDLER-CARTER his
wife, MELVIN CARVER, and CATERIAL
CARVER his wife, MARIO CELOTTO, and
DEIRDRE CELOTTO his wife, EARL
CHRISTY, ALLAN V. CLARK, and
DEBORAH CLARK his wife, REGINALD
CLARK, ANTHONY “TONY” CLINE, JR.,
RON CODER and KATHLEEN CODER his
wife, WILLIAM “BILL” CODY, and
SUZANNE CODY his wife, DANIEL
COLCHICO, and NANCY COLCHICO his
wife, WILLIAM COOKE, MARK COOPER,
and MARY COOPER his wife, DOUGLAS
COSBIE, and SHARON COSBIE his wife,

No. 12-CV-92 (AB)

AMENDED COMPLAINT

JURY TRIAL DEMANDED

<p>DAVID COSTA, and RUTH COSTA his wife, MARK COTNEY, and CAROL COTNEY his wife, JAMES COVERT, NEAL CRAIG, JOE CRIBBS, and VERNESSA CRIBBS his wife, PETER CRONAN, and DEBORAH CRONAN his wife, WILLIAM CURRAN IV, and HEATHER CURRAN his wife, CRAIG CURRY, TOM CURTIS, and DEBRA CURTIS his wife, WILLIAM DANIEL, and RUTH DANIEL his wife, MICHAEL “TONY” DAVIS, and LORI DAVIS, his wife, JOE DELAMIELLEURE, and GERRI DELAMIELLEURE his wife, HERBERT DOBBINS, and CAROLYN DOBBINS his wife, CONRAD DOBLER, and JOY DOBLER his wife, JAMES BRIAN DUNCAN, and DIANE DUNCAN his wife, JON “REGGIE” DUPARD, KENNETH EASLEY, JR., and GAIL EASLEY his wife, SCOTT EATON, and CYNTHIA EATON his wife, BRAD EDELMAN, CRAIG ELLIS, KEN FANTETTI, and KENDRA RAE FANTETTI his wife, JOE FERGUSON, JR., and SANDY FERGUSON his wife, STEVE FOLEY, and CINDY FOLEY his wife, LEE FOLKINS, and YOLANDA FOLKINS his wife, FRED FORSBERG, and KAYE FORSBERG his wife, TIMOTHY FOX, and DEBRA FOX his wife, PHILLIP FREEMAN III, and MARIA FREEMAN his wife, DARRELL FULLINGTON, and TRACEY FULLINGTON his wife, , DERRICK GAFFNEY, LAWRENCE “LARRY” GAGNER, and DORIS GAGNER his wife, JAMES GARCIA, HUBERT GINN, RANDY GRADISHAR, and BEVERLY GRADISHAR his wife, MELVIN GRAY, and RHONDA GRAY his wife, DONALD GRECO, and DIANA GRECO his wife, DONNIE GREEN, JACQUEZ GREEN, WILLIE GREEN, and DENA GREEN his wife, ROBERT GREGOR and AUDREY GREGOR his wife, ALFRED GROSS, DALE HACKBART, and EILEEN HACKBART his wife, BOBBY HARDEN, JR., CEDRICK HARDMAN, DENNIS HARRAH, and TERESA HARRAH his wife, CHARLEY HARRAWAY, and GAIL HARRAWAY his wife, JAMES HARRELL, and MARIA YODER his wife, CLIFF HARRIS, and KAREN HARRIS his wife, CHILTON “ALEX” HAWKINS, and CHARLOTTE HAWKINS his wife, VICTOR HICKS, and ALBERTA HICKS his wife,</p>	
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<p> KENT HILL, DON HORN, and BARBARA HORN his wife, RONNIE HORNSBY, and CHARLOTTE HORNSBY his wife, JAMES HOUGH, and SHERYL HOUGH his wife, JOHN HOUSER, and MARYALISON HOUSER his wife, PAUL HOWARD, and JACQUE HOWARD his wife, DELLES HOWELL, and SHELIA HOWELL his wife, KEN HUFF, MICHAEL HULL, and CONSTANCE HULL his wife, DAVID HUMM, BILL HURLEY, DARRELL IRVIN, and SANDRA IRVIN his wife, BRAD JACKSON, and AMY PEREZ-JACKSON his wife, CALVIN JACKSON, VESTEE JACKSON, J. BRUCE JARVIS, and CYNTHIA JARVIS his wife, LEON “RAY” JARVIS, and DIANE JARVIS his wife, NOEL JENKE, ANTHONY “TONY” JETER, JIM JODAT, JACK JOHNSON, OLRICK JOHNSON, JR., and AMIRAH JOHNSON his wife, TROY JOHNSON, TRUMAINE JOHNSON, and LAWAND JOHNSON his wife, AARON JONES II, and JANNITA JONES his wife, JAMES JONES, KENNETH JONES, and GLORIA JONES his wife, STEVE JONES, and SANDRA JONES his wife, JOSEPH KAPP, and JENNIFER KAPP his wife, ERNEST KELLERMANN, and MARYANN KELLERMANN his wife, LOUIS KIROUAC, and DORIS KIROUAC his wife, MARK KONCAR, and KAREN KONCAR his wife, MERVIN KRAKAU, and BARBARA KRAKAU his wife, PAUL KRAUSE, and PAMELA KRAUSE his wife, ROBERT KROLL, CHARLES KRUEGER, and KRISTIN KRUEGER his wife, THADDEUS “TED” KWALICK, Jr., BRUCE LAIRD, and MARY LAIRD his wife, MACARTHUR LANE, and EDNA LANE his wife, GENE LANG, and B. MERCEDEZ LANG his wife, WILLIAM “BILL” LASKEY, and DONA LASKEY his wife, PETER LAZETICH, and CYNTHIA LAZETICH his wife, JACK LEE, and JOAN LEE his wife, FRANK LEWIS, and NORMA LEWIS his wife, THOMAS LOTT, WARREN LOVING, and CHALONDA LOVING his wife, ROBERT LURTSEMA, and ALOISE LURTSEMA his wife, DONALD MACEK, and JAN MACEK his wife, DONALD MANOUKIAN, ROD MARTIN, and REGINA MARTIN his wife, WILLIAM MATAN, and JANICE MATAN his wife, </p>	
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<p>DONALD MCCAULEY, and TRACEY MCCAULEY his wife, LEONARD “BUBBA” MCDOWELL JR., and CANDICE MCDOWELL his wife, DENNIS MCKNIGHT, and JODI MCKNIGHT his wife, MICHAEL MEADE, and GLORIA MEADE his wife, JON MELANDER, and BETH-ANNE MELANDER his wife, CHARLES “CHUCK” MERCEIN, and JODY MERCEIN his wife, MICHAEL MERRIWEATHER, and SANDRA MERRIWEATHER his wife, CALEB MILLER, and BRITNEY MILLER his wife, CLEOPHUS “CLEO” MILLER, and STACY MILLER his wife, KORY MINOR, and LISA RODRIGUEZ-MINOR his wife, AARON MITCHELL, DERLAND MOORE, and FRANCIS MOORE his wife, MICHAEL MORTON, and ELLEN MORTON his wife, CHARLES MYRTLE, MARK NICHOLS, and TERRIS NICHOLS his wife, TOMMY NOBIS, and CAROLYN NOBIS his wife, KEITH NORD, and JENNIFER NORD his wife, JOE NORMAN, and SARAH NORMAN his wife, AUGUST “GUS” OTTO, and MARY OTTO his wife, R.C. OWENS, and SUSAN OWENS his wife, TERRY OWENS, and ALISON OWENS his wife, GARY PADJEN, and SONIA PADJEN his wife, DONALD PARRISH and LYNETTE PARRISH his wife, KURT PETERSEN, and KAREN PETERSEN his wife, WARREN POWERS, and LINDA POWERS his wife, ANTHONY PRIOR, RANDY RAGON, DAVID RECHER, and CAMILLE RECHER his wife, RUDY REDMOND, and CHRISTINE REDMOND his wife, CLARENCE REECE, and LINDA REECE his wife, WALTER ROBERTS, JERRY ROBINSON, MARK ROBINSON, and MELINDA ROBINSON his wife, RODRICK RODGERS, and KAREN RODGERS his wife, ROBIN “ROB” RUBICK, and DEBORAH RUBICK his wife, FRANK RYAN, and JOAN RYAN his wife, STEVEN SCHUBERT, and SANDRA SCHUBERT his wife, WILLIAM “BILLY” SHIELDS, and LAUREL SHIELDS his wife, EDWARD SIMONINI, and KAREN SIMONINI his wife, KEITH SIMS, and TIA SIMS his wife, FRED SMERLAS, and KRISTINE SMERLAS his wife, CHARLIE SMITH, MICHAEL SOMMER, and BARBARA SOMMER his wife, ARTHUR</p>	
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STILL, and LIZBETH STILL his wife,
BRYAN STOLTENBERG, and LAURA
STOLTENBERG his wife, DANIEL
SULLIVAN, and LORRAINE SULLIVAN his
wife, WILLIE TAYLOR, CHARLES
THOMAS, STEVE THURLOW, and CHRIS
ANN THURLOW his wife, LOVE JAMES
TOLBERT, and BEVERLY TOLBERT his
wife, WILLIAM “BILLY” TRUAX,
CLARENCE VERDIN, and CAROLYN
VERDIN his wife, PHIL VILLAPIANO, and
SUSAN VILLAPIANO his wife, DAVE
WASHINGTON, JR., and DIANNE
WASHINGTON his wife, JOE
WASHINGTON, and MEADOW
WASHINGTON his wife, LARRY
WEBSTER, MICHAEL WEDDINGTON, and
JACQUELINE WEDDINGTON his wife,
EDWARD WHITE, and JOAN WHITE his
wife, JAMES WILLIAMS, JOHN WILLIAMS
and SHARON WILLIAMS his wife, JERRY
WILSON, MIKE WOOD, LARRY WOODS,
and ROSE MARIE WOODS his wife,
MARVIN WOODSON, and SELITTA
WOODSON his wife, FRANK YOUSO, and
EVELYN YOUSO his wife,

PLAINTIFFS,

V.

NATIONAL FOOTBALL LEAGUE, and NFL
PROPERTIES LLC,

DEFENDANTS.

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INTRODUCTION

1. This action is brought to seek declaratory relief and damages related to the Defendants' tortious misconduct and voluntary undertaking with regard to the health effects of repeated head impacts, and the injuries consequently suffered by the Plaintiffs who are former National Football League ("NFL" or "League") players. The injuries include concussions and repeated head impacts and their sequelae suffered by the Plaintiffs during their play in the NFL, including traumatic brain injuries and latent neurodegenerative disorders and diseases. The allegations herein, except as to the Plaintiffs themselves, are based on information and belief.

JURISDICTION AND VENUE

2. The Court has subject-matter jurisdiction over this action under 28 U.S.C. § 1332(d)(11). The amount in controversy for each Plaintiff exceeds \$75,000, and the aggregate amount in controversy for all Plaintiffs in this mass action exceeds \$5,000,000, exclusive of interest and costs. This matter can be tried jointly in that the Plaintiffs' claims involve common questions of law or fact.

3. This Court has personal jurisdiction over the Defendants because they have substantial and continuous business contacts in the Commonwealth of Pennsylvania.

4. Venue is proper pursuant to 28 U.S.C. § 1391(a)(2), and 28 U.S.C. § 1391(b)(2), as a substantial part of the events and omissions giving rise to the claims occurred in this judicial district.

THE PARTIES

5. Plaintiff Brent Boyd ("Boyd") is 54 years old and resides with his wife, Plaintiff Gina Boyd, in Reno, Nevada. He was an NFL offensive guard who played with the Minnesota Vikings (1980-86). He has been diagnosed with Chronic Traumatic Encephalopathy

(“CTE”). Boyd was one of several former NFL players who testified on June 26, 2007 about concussions in the NFL before a Subcommittee of the United States House of Representatives’ Judiciary Committee. He founded the NFL retired player advocacy group Dignity After Football. Boyd suffered repeated and chronic head impacts during his career in the NFL and as a result, has experienced cognitive difficulties including, but not limited to, CTE, headaches, dizziness, loss of memory, suicidal thoughts, fatigue, depression, temporary blindness, and vertigo. As a result of Boyd’s impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

6. Plaintiff Robert Abraham (“Abraham”) is 51 years old and resides in Raleigh, North Carolina. He was an NFL linebacker for the Houston Oilers (1982-88). Abraham suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Abraham has experienced cognitive difficulties.

7. Plaintiff Anthony “Tony” Adams (“Adams”) is 61 years old and resides with his wife, Plaintiff Diane Adams, in Overland Park, Kansas. He was an NFL quarterback for the Kansas City Chiefs (1975-78), and the Minnesota Vikings (1987). Adams suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Adams has experienced cognitive and other difficulties including but not limited to, headaches, loss of memory, fatigue, sleep problems, neck and cervical arthritis and associated numbness/tingling. As a result of Adams’s impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

8. Plaintiff Margene Adkins (“Adkins”) is 64 years old and resides with his wife in Fort Worth, Texas. He was an NFL wide receiver for the Dallas Cowboys (1970-71), the

New Orleans Saints (1972), and the New York Jets (1973). Adkins suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Adkins has experienced cognitive difficulties including, but not limited to, headaches, dizziness, and loss of memory. As a result of Adkins's impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

9. Plaintiff David Ahrens ("Ahrens") is 53 years old and resides with his wife, Plaintiff Karen Ahrens, in Pittsboro, Indiana. He was an NFL linebacker for the St. Louis Cardinals (1981-84), the Indianapolis Colts (1985-87), the Detroit Lions (1988), the Miami Dolphins (1989), and the Seattle Seahawks (1990). Ahrens suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Ahrens has experienced cognitive difficulties including, but not limited to, headaches, dizziness, loss of memory, impulse control problems, depression, suicidal thoughts, and fatigue. As a result of Ahrens's impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

10. Plaintiff Samaji Akili ("Akili") is 60 years old and resides in Edmonton, Alberta, Canada. He was an NFL defensive back for the San Diego Chargers (1974-75), and the Houston Oilers (1976-77). Akili suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Akili has experienced cognitive and other difficulties including, but not limited to, depression, sleep problems, irritability, and numbness and tingling in the neck/cervical spine.

11. Plaintiff Fred Anderson ("Anderson") is 56 years old and resides with his wife, Plaintiff Darla Anderson, in Kirkland, Washington. He was an NFL defensive end for the

Pittsburgh Steelers (1978-79), and the Seattle Seahawks (1980-82). Anderson suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Anderson has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, impulse control problems, depression, suicidal thoughts, fatigue, sleep problems, irritability, neck and cervical arthritis and associated numbness/tingling. As a result of Anderson's impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

12. Plaintiff Garry "Donny" Anderson ("G. Anderson") is 68 years old and resides in Dallas, Texas. He was an NFL running back and punter for the Green Bay Packers (1966-71) and St. Louis Cardinals (1972-75). Most football historians credit G. Anderson as the punter who invented the concept of "hang-time," allowing coverage units time to get down field thereby limiting the amount of return yards. He was selected to one Pro Bowl, was a two-time Super Bowl Champion (Super Bowls I and II), and is a member of the Green Bay Packers Hall of Fame. G. Anderson suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, G. Anderson has experienced cognitive and other difficulties including, but not limited to, headaches, loss of memory, sleep problems, neck and cervical arthritis and associated numbness/tingling.

13. Plaintiff Richard Anderson ("R. Anderson") is 40 years old and resides in Germantown, Maryland. He was an NFL running back for the New York Jets (1993-2002) and the Dallas Cowboys (2003-04). He was selected to one Pro Bowl in 2001. R. Anderson suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, R. Anderson has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, impulse control problems,

neurological disorder, depression, fatigue, sleep problems, irritability, neck and cervical arthritis and associated numbness/tingling.

14. Plaintiff Reidel Anthony (“R. Anthony”) is 35 years old and resides in Tampa, Florida. He was an NFL wide receiver for the Tampa Bay Buccaneers (1997-2001). He holds the NFL record as the youngest player ever to record a touchdown reception (20 years, 315 days). R. Anthony suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, R. Anthony has experienced cognitive difficulties.

15. Plaintiff Lionel Antoine (“Antoine”) is 61 years old and resides in Biloxi, Mississippi. He was an NFL offensive tackle for the Chicago Bears (1972-78). Antoine suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Antoine has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, depression, suicidal thoughts, sleep problems, irritability, neck and cervical arthritis and associated numbness/tingling.

16. Plaintiff Harvey Armstrong (“Armstrong”) is 51 years old and resides with his wife, Plaintiff Sharon Armstrong, in Norcross, Georgia. He was an NFL nose tackle who played for the Philadelphia Eagles (1982-84) and the Indianapolis Colts (1986-90). Armstrong suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Armstrong has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, impulse control problems, neurological disorder, depression, suicidal thoughts, fatigue, sleep problems, irritability, neck and cervical spine arthritis and associated numbness/tingling. As a result of

Armstrong's impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

17. Plaintiff Mark Arneson ("Arneson") is 62 years old and resides with his wife, Plaintiff Kristine Arneson, in Chesterfield, Missouri. He was an NFL linebacker who played for the St. Louis Cardinals (1972-80). Arneson suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Arneson has experienced cognitive difficulties including, but not limited to, headaches, loss of memory, sleep problems, and inability to concentrate or focus. As a result of Arneson's impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

18. Plaintiff Peter Athas ("Athas") is 64 years old and resides in Hollywood, Florida. He was an NFL defensive back who played for the New York Giants (1971-74), the Cleveland Browns (1975), the Minnesota Vikings (1975), and the New Orleans Saints (1976). Athas suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Athas has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, fatigue, sleep problems, irritability, neck and cervical spine arthritis and associated numbness/tingling.

19. Plaintiff Mike Augustyniak ("Augustyniak") is 55 years old and resides in St. Johns, Florida. He was an NFL running back who played for the New Orleans Saints (1980) and the New York Jets (1981-84). Augustyniak suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Augustyniak has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, impulse control problems, depression, suicidal thoughts,

fatigue, sleep problems, irritability, neck/cervical spine arthritis and associated numbness and tingling.

20. Plaintiff John Banaszak (“Banaszak”) is 61 years old and resides with his wife, Plaintiff Mary Banaszak, in McMurray, Pennsylvania. He was an NFL defensive tackle who played for the Pittsburgh Steelers (1975-81). He was a three-time Super Bowl Champion for the Steelers (Super Bowls X, XIII, and XIV). Banaszak suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Banaszak has experienced cognitive difficulties. As a result of Banaszak’s impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

21. Plaintiff Jeff Barnes (“J. Barnes”) is 56 years old and resides with his wife, Plaintiff Anthetha Barnes, in Stockton, California. He was an NFL linebacker who played for the Oakland/Los Angeles Raiders (1977-87). Barnes was a member of the Raiders’ Super Bowl XV and XVIII Championship teams. J. Barnes suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, J. Barnes has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, impulse control problems, depression, suicidal thoughts, fatigue, sleep problems, irritability, neck/cervical spine arthritis and associated numbness and tingling. As a result of Barnes’ impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

22. Plaintiff Lemuel Barney (“Barney”) is 66 years old and resides with his wife, Plaintiff Jacqueline Barney, in Commerce, Michigan. He was an NFL defensive back who played with the Detroit Lions (1967-77). He was voted NFL Defensive Rookie of the Year in

1967 and was selected to the NFL's 1960s All Decade Team. He was a seven-time Pro Bowl selection (1967-69, 1972-73, 1975-76) and was a seven-time All Pro selection (1967-70, 1972-73, 1975). He was elected to the Pro Football Hall of Fame in 1992. In 1999, Barney was included in the Sporting News's list of the 100 greatest football players. Barney suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Barney has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, irritability, sleep problems, neck and cervical arthritis and associated numbness/tingling. As a result of Barney's impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

23. Plaintiff Steve Bartkowski ("Bartkowski") is 59 years old and resides with his wife, Plaintiff Sandee Bartkowski, in Johns Creek, Georgia. He was an NFL quarterback who played for the Atlanta Falcons (1975-85) and the Los Angeles Rams (1986). He was voted NFL Rookie of the Year in 1975, and was a two-time Pro Bowl selection (1980-81). He is currently the all-time passing-yards leader of the Atlanta Falcons and his uniform was retired by the Falcons organization. Bartkowski suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Bartkowski has experienced cognitive and other difficulties including, but not limited to, headaches, loss of memory, impulse control problems, depression, suicidal thoughts, sleep problems, irritability, neck and cervical arthritis and associated numbness/tingling. As a result of Bartkowski's impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

24. Plaintiff Mike Bass (“Bass”) is 66 years old and resides with his wife, Plaintiff Rosita Bass, in Gainesville, Florida. He was an NFL defensive back who played for the Detroit Lions (1967) and the Washington Redskins (1969-75). In 2002, to honor the 70th anniversary of the Washington Redskins organization, Bass was named a member of the 70 Greatest Redskins of all time. He played in Super Bowl VII, scoring the only touchdown by the Redskins in the game. Bass suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Bass has experienced cognitive difficulties. As a result of Bass’s impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

25. Plaintiff Doug Beaudoin (“Beaudoin”) is 57 years old and resides with his wife, Plaintiff Renee Beaudoin, in Tampa, Florida. He was an NFL safety who played for the New England Patriots (1976-79), the Miami Dolphins (1980-81), and the San Diego Chargers (1982). Beaudoin suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Beaudoin has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, impulse control problems, depression, suicidal thoughts and neck and cervical arthritis. As a result of Beaudoin’s impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

26. Plaintiff Thomas J. Beer (“Beer”) is 67 years old and resides in Pine Brook, New Jersey. He was an NFL tight end who played for the Denver Broncos (1967-68) and the Boston/New England Patriots (1971-72). Beer suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Beer

has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, depression, and neck and cervical arthritis.

27. Plaintiff Billy Bell (“Bell”) is 51 years old and resides in Humble, Texas. He was an NFL defensive back who played for the Houston Oilers (1989-90), and the Kansas City Chiefs (1991). Bell suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Bell has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, impulse control problems, sleep problems, irritability, and neck/cervical spine numbness and tingling.

28. Plaintiff Nicholas Bell (“N. Bell”) is 43 years old and resides with his wife, Plaintiff Trish Bell, in Costa Mesa, California. He was an NFL running back who played for the Los Angeles Raiders (1991-93). N. Bell suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, N. Bell has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, impulse control problems, depression, suicidal thoughts, fatigue, sleep problems, irritability, neck and cervical arthritis, and associated numbness/tingling. As a result of N. Bell’s impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

29. Plaintiff Robert Bell, Jr. (“R. Bell”) is 63 years old and resides with his wife, Plaintiff Patricia Bell, in North Wales, Pennsylvania. He was an NFL defensive tackle for the Detroit Lions (1971-73) and the St. Louis Cardinals (1974-78). R. Bell suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, R. Bell has experienced cognitive difficulties including, but not limited to, headaches, dizziness, and loss of memory. As a result of R. Bell’s impairments, his wife has

been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

30. Plaintiff Robert Berry (“Berry”) is 69 years old and resides in Gardenville, Nevada. He was an NFL quarterback who played for the Minnesota Vikings (1965-67, 1973-76) and the Atlanta Falcons (1968-72). He was selected to one Pro Bowl in 1969, and played in three Super Bowls (Super Bowls VIII, IX, and XI) as a member of the Vikings. Berry suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Berry has experienced cognitive and other difficulties including, but not limited to, tinnitus, sleep problems, neck/cervical spine arthritis and associated numbness and tingling.

31. Plaintiff Nicholas Bolkovac (“Bolkovac”) is 83 years old and resides in Youngstown, Ohio. He was an NFL defensive tackle for the Pittsburgh Steelers (1953-54). Bolkovac suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Bolkovac has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, sleep problems, and cervical spine numbness and tingling.

32. Plaintiff James Bowman (“Bowman”) is 48 years old and resides with his wife, Plaintiff Tracy Bowman, in Norton, Massachusetts. He was an NFL defensive back for the New England Patriots (1985-89). Bowman suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Bowman has experienced cognitive difficulties including, but not limited to, headaches, loss of memory, depression, fatigue, sleep problems, and irritability. As a result of Bowman’s impairments, his

wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

33. Plaintiff Gregory Boyd (“G. Boyd”) is 59 years old and resides in Highlands Ranch, Colorado. He was an NFL defensive end for the New England Patriots (1977-78), the Denver Broncos (1979-82), the Green Bay Packers (1983), the San Francisco 49ers (1984), and the Los Angeles Raiders (1984). G. Boyd suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, G. Boyd has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, depression, fatigue, sleep problems, irritability, neck/cervical spine arthritis and associated numbness and tingling.

34. Plaintiff Henry Bradley (“Bradley”) is 58 years old and resides with his wife, Plaintiff Tonya Bradley, in Temecula, California. He was an NFL nose tackle for the Cleveland Browns (1979-83). Bradley suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Bradley has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, impulse control problems, depression, suicidal thoughts, fatigue, sleep problems, irritability, neck/cervical spine arthritis and associated numbness and tingling. As a result of Bradley’s impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

35. Plaintiff Marc Brown (“Brown”) is 50 years old and resides in Tuscon, Arizona. He was an NFL wide receiver for the Buffalo Bills (1987). Brown suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Brown has experienced cognitive difficulties.

36. Plaintiff Raymond Brown (“R. Brown”) is 63 years old and resides with his wife, Plaintiff Linda Brown, in Marietta, Georgia. He was an NFL safety for the Atlanta Falcons (1971-77), and the New Orleans Saints (1978-80). R. Brown suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, R. Brown has experienced cognitive difficulties including, but not limited to, headaches, dizziness, loss of memory, impulse control problems, fatigue, and irritability. As a result of R. Brown’s impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

37. Plaintiff Noah Burroughs (“Burroughs”) resides in Baldwin, New York. He was an NFL safety for the New York Jets (2001) and the Jacksonville Jaguars (2002). Burroughs suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Burroughs has experienced cognitive and other difficulties including, but not limited to, headaches, loss of memory, depression, fatigue, sleep problems, irritability, impulse control problems, fatigue, irritability neck/cervical spine arthritis and associated numbness and tingling.

38. Plaintiff Kenneth Burrow (“Burrow”) is 59 years old and resides with his wife, Plaintiff Nancy Burrow, in Georgia. He was an NFL safety for the Atlanta Falcons (1971-77) and the New Orleans Saints (1978-80). Burrow suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Burrow has experienced cognitive difficulties. As a result of Burrow’s impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

39. Plaintiff William Cahill (“Cahill”) is 60 years old and resides in Medina, Washington. He was an NFL defensive back for the Buffalo Bills (1973-74). Cahill suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Cahill has experienced cognitive difficulties including, but not limited to, headaches.

40. Plaintiff John Cappelletti (“Cappelletti”) is 59 years old and resides with his wife, Plaintiff Betty Cappelletti, in Laguna Niguel, California. He was an NFL running back for the Los Angeles Rams (1974-79) and the San Diego Chargers (1980-83). Cappelletti suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Cappelletti has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, depression, fatigue, irritability, neck/cervical spine arthritis and associated numbness and tingling. As a result of Cappelletti’s impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

41. Plaintiff Roger Carr (“Carr”) is 59 years old and resides with his wife, Plaintiff Undine Carr, in Charlotte, North Carolina. He was an NFL wide receiver for the Baltimore Colts (1974-81), the Seattle Seahawks (1982), and the San Diego Chargers (1983). He was selected to one Pro Bowl in 1976. Carr suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Carr has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, neck/cervical spine arthritis and associated numbness and tingling. As a result of Carr’s impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

42. Plaintiff Allen Carter (“Carter”) is 59 years old and resides with his wife, Plaintiff Cheryl Chandler-Carter, in Oceanside, California. He was an NFL running back for the New England Patriots (1975-76). Carter suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Carter has experienced cognitive difficulties. As a result of Carter’s impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

43. Plaintiff Melvin Carver (“Carver”) is 52 years old and resides with his wife, Plaintiff Caterial Carver, in Tampa, Florida. He was an NFL running back for the Tampa Bay Buccaneers (1982-85) and the Indianapolis Colts (1987). Carver suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Carver has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, depression, suicidal thoughts, fatigue, sleep problems, irritability, neck/cervical spine arthritis and associated numbness and tingling. As a result of Carver’s impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

44. Plaintiff Mario Celotto (“Celotto”) is 55 years old and resides with his wife, Plaintiff Deirdre Celotto, in Oakland, California. He was an NFL linebacker for the Buffalo Bills (1978), the Oakland Raiders (1980-81), the Baltimore Colts (1981), and the Los Angeles Rams (1981). He was a member of the Super Bowl Champion Oakland Raiders in Super Bowl XV. Celotto suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Celotto has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of

memory, depression, suicidal thoughts, fatigue, sleep problems, irritability, neck/cervical spine arthritis and associated numbness and tingling. As a result of Celotto's impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

45. Plaintiff Earl Christy ("Christy") is 68 years old and resides in Tarpon Springs, Florida. He was an NFL running back for the New York Jets (1966-68). Christy suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Christy has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, impulse control problems, depression, fatigue, sleep problems, irritability, neck/cervical spine arthritis and associated numbness and tingling.

46. Plaintiff Allan Clark ("Clark") is 54 years old and resides with his wife, Plaintiff Deborah Clark, in Valley Center, California. He was an NFL running back who played for the New England Patriots (1979-80), the Buffalo Bills (1982), and the Green Bay Packers (1982). Clark suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Clark has experienced cognitive difficulties. As a result of Clark's impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

47. Plaintiff Reginald Clark ("R. Clark") is 44 years old and resides in North Carolina. He was an NFL linebacker who played for the Pittsburgh Steelers (1994) and the Jacksonville Jaguars (1995-96). R. Clark suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, R. Clark has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness,

blurry vision, ringing in his ears, loss of memory, impulse control problems, depression, suicidal thoughts, fatigue, sleep problems, irritability, neck and cervical arthritis and associated numbness/tingling.

48. Plaintiff Anthony “Tony” Cline, Jr. (“Cline Jr.”) is 40 years old and resides in Venice, California. He was an NFL tight end who played for the Buffalo Bills (1995-97), the San Francisco 49ers (1999), and the Pittsburgh Steelers (1999). Cline, Jr. suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Cline, Jr. has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, impulse control problems, depression, fatigue, sleep problems, irritability, neck and cervical arthritis and associated numbness/tingling.

49. Plaintiff Ron Coder (“Coder”) is 57 years old and resides with his wife, Plaintiff Kathleen Coder in Pittsburgh, Pennsylvania. He was an NFL offensive lineman for the Seattle Seahawks (1976-79) and the St. Louis Cardinals (1980-82). Coder suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Coder has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, irritability, and neck and cervical arthritis and associated numbness/tingling. As a result of Coder’s impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

50. Plaintiff William “Bill” Cody (“Cody”) is 67 years old and resides with his wife, Plaintiff Suzanne Cody, in Fairhope, Alabama. He was an NFL linebacker who played for the Detroit Lions (1966), the New Orleans Saints (1967-70), and the Philadelphia Eagles (1972). Cody suffered repeated and chronic head impacts during his career in the NFL and is at

an increased risk of latent brain disease. As a result, Cody has experienced cognitive difficulties. As a result of Cody's impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

51. Plaintiff Daniel Colchico ("Colchico") is 76 years old and resides with his wife, Plaintiff Nancy Colchico, in Concord, Connecticut. He was an NFL defensive end who played for the San Francisco 49ers (1960-65) and the New Orleans Saints (1969). Colchico suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Colchico has experienced cognitive difficulties. As a result of Colchico's impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

52. Plaintiff William Cooke ("Cooke") is 61 years old and resides in Fairfield, Connecticut. He was an NFL defensive tackle who played for the Green Bay Packers (1975), the San Francisco 49ers (1976-77), the Detroit Lions (1978), and the Seattle Seahawks (1978-80). Cooke suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Cooke has experienced cognitive difficulties including, but not limited to, depression, suicidal thoughts, fatigue, sleep problems, and irritability.

53. Plaintiff Mark Cooper ("Cooper") is 51 years old and resides with his wife, Plaintiff Mary Cooper, in Aurora, Colorado. He was an NFL offensive tackle who played for the Denver Broncos (1983-87) and the Tampa Bay Buccaneers (1987-89). Cooper suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Cooper has experienced cognitive and other difficulties including, but not limited to, sleep problems, and neck and cervical numbness/tingling. As a

result of Cooper's impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

54. Plaintiff Douglas Cosbie ("Cosbie") is 55 years old and resides with his wife, Plaintiff Sharon Cosbie, in Loomis, California. He was an NFL tight end who played for the Dallas Cowboys (1979-88) and the Denver Broncos (1989). He was a three-time Pro Bowl selection (1983-85). Cosbie suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Cosbie has experienced cognitive difficulties including, but not limited to, loss of memory, impulse control problems, sleep problems, and irritability. As a result of Cosbie's impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

55. Plaintiff David Costa ("Costa") is 70 years old and resides with his wife, Plaintiff Ruth Costa, in Brentwood, California. He was an NFL defensive tackle who played for the Oakland Raiders (1963-65), the Buffalo Bills (1966, 1974), the Denver Broncos (1967-71), and the San Diego Chargers (1972-73). He was a four-time AFL All-Star (1963, 1967-69). Costa suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Costa has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, impulse control problems, depression, fatigue, irritability, neck and cervical arthritis and associated numbness/tingling. As a result of Costa's impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

56. Plaintiff Mark Cotney ("Cotney") is 59 years old and resides with his wife, Plaintiff Carol Cotney, in Lutz, Florida. He was an NFL defensive back who played for the Houston Oilers (1975) and the Tampa Bay Buccaneers (1976-84). Cotney was selected by the

Tampa Bay Buccaneers in the 1976 Expansion Draft and was a member of the original winless 1976 Buccaneers team. Cotney suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Cotney has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, depression, fatigue, sleep problems, irritability, neck and cervical arthritis and associated numbness/tingling. As a result of Cotney's impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

57. Plaintiff James Covert ("Covert") is 51 years old and resides in Weston, Florida. He was an NFL offensive tackle who played for the Chicago Bears (1983-91). He was a two-time Pro Bowl selection (1985-86), was a four-time All-Pro selection (1984-87), was voted offensive lineman of the year in 1985-86, was a member of the NFL 1980s All-Decade Team, and was a member of the Super Bowl XX Champion Chicago Bears. Covert suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Covert has experienced cognitive and other difficulties including, but not limited to, headaches, and neck and cervical arthritis and associated numbness/tingling.

58. Plaintiff Neal Craig ("Craig") is 63 years old and resides in Cincinnati, Ohio. He was an NFL defensive back for the Cincinnati Bengals (1971-73), the Buffalo Bills (1974), and the Cleveland Browns (1975-76). Craig suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Craig has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, fatigue, and numbness/tingling in his neck and cervical spine.

59. Plaintiff Joe Cribbs (“Cribbs”) is 54 years old and resides with his wife, Plaintiff Vernessa Cribbs, in Birmingham, Alabama. He was an NFL running back for the Buffalo Bills (1980-83, 1985), the San Francisco 49ers (1986-87), the Indianapolis Colts (1988), and the Miami Dolphins (1988). He was a three-time Pro Bowl selection (1980-81, 1983). Cribbs suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Cribbs has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, depression, fatigue, sleep problems, irritability, neck and cervical spine arthritis and associated numbness/tingling. As a result of Cribbs’s impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

60. Plaintiff Peter Cronan (“Cronan”) is 56 years old and resides with his wife, Plaintiff Deborah Cronan, in Hopkinton, Massachusetts. He was an NFL linebacker for the Seattle Seahawks (1977-81) and the Washington Redskins (1981-85). Cronan was a member of the Washington Redskins Super Bowl XVII Championship team. Cronan suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Cronan has experienced cognitive difficulties including, but not limited to, headaches, lightheadedness, and dizziness. As a result of Cronan’s impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

61. Plaintiff William Curran (“Curran”) is 52 years old and resides with his wife, Plaintiff Heather Curran, in Windsor, California. He was an NFL wide receiver for the Atlanta Falcons (1982-84). Curran suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Curran has experienced

cognitive and other difficulties including, but not limited to, loss of memory, sleep problems, neck and cervical spine arthritis and associated numbness/tingling. As a result of Curran's impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

62. Plaintiff Craig Curry ("Curry") is 50 years old and resides in Houston, Texas. He was an NFL defensive back for the Tampa Bay Buccaneers (1984-86), and the Indianapolis Colts (1987). Curry suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Curry has experienced cognitive difficulties.

63. Plaintiff Tom Curtis ("Curtis") is 64 years old and resides with his wife, Plaintiff Debra Curtis, in Doral, Florida. He was an NFL defensive back for the Baltimore Colts (1970-71), and the Miami Dolphins (1972). He was a member of the Super Bowl Champion Baltimore Colts in Super Bowl V. Curtis suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Curtis has experienced cognitive and other difficulties including, but not limited to, headaches, loss of memory, sleep problems, and cervical spine numbness/tingling. As a result of Curtis's impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

64. Plaintiff William Daniel ("Daniel") is 74 years old and resides with his wife, Plaintiff Ruth Daniel, in Starkville, Mississippi. He was an NFL defensive back for the Pittsburgh Steelers (1961-66), and the Los Angeles Rams (1967-69). Daniel suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Daniel has experienced cognitive difficulties including, but not limited to,

loss of memory, chronic brain injury, dementia, CTE, neurological disorder, and depression. As a result of Daniel's impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

65. Plaintiff Michael "Tony" Davis ("Davis") is 58 years old and resides with his wife, Plaintiff Lori Davis, in Greeley, Colorado. He was an NFL running back for the Cincinnati Bengals (1976-78), and the Tampa Bay Buccaneers (1979-81). In 1977, Davis was voted team MVP by the Bengals. Davis suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Davis has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, fatigue, sleep problems, irritability, neck and cervical arthritis and associated numbness/tingling. As a result of Davis's impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

66. Plaintiff Joseph DeLamielleure ("DeLamielleure") is 60 years old and resides with his wife, Plaintiff Gerri DeLamielleure, in Charlotte, North Carolina. He was an NFL offensive guard who played for the Buffalo Bills (1973-79, 1985) and the Cleveland Browns (1980-84). He was selected to be included in the Wall of Fame for both teams. He was voted Co-Offensive Lineman of the Year in 1973 and the NFLPA/AFC Offensive Lineman of the Year in 1975. In 1977, he received the Forrest Gregg Award as the NFL Offensive Lineman of the Year. He was selected six times to the Pro Bowl (1975-80) and as All Pro (1975-80). DeLamielleure was elected to the Pro Football Hall of Fame in 2003. DeLamielleure suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, DeLamielleure has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, depression, suicidal

thoughts, fatigue, sleep problems, irritability, 60% hearing loss in his left ear, neck and cervical spine arthritis and associated numbness/tingling. As a result of DeLamielleure's impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

67. Plaintiff Herbert Dobbins ("Dobbins") is 60 years old and resides with his wife, Plaintiff Carolyn Dobbins, in Alberta, Canada. He was an NFL tackle for the Philadelphia Eagles (1974). Dobbins suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Dobbins has experienced cognitive difficulties. As a result of Dobbins' impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

68. Plaintiff Conrad Dobler ("Dobler") is 61 years old and resides with his wife, Plaintiff Joy Dobler, in Overland Park, Kansas. He was an NFL offensive guard for the St. Louis Cardinals (1972-77), New Orleans Saints (1978-79), and Buffalo Bills (1980-81). He was a six-time Pro Bowl selection (1975-77). Dobler is 90% disabled today, having had nine knee replacement surgeries alone. Dobler suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Dobler has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, dementia, impulse control problems, depression, suicidal thoughts, fatigue, sleep problems, irritability, neck and cervical arthritis and associated numbness/tingling. As a result of Dobler's impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

69. Plaintiff James Brian Duncan ("Duncan") is 59 years old and resides with his wife, Plaintiff Diane Duncan, in Graham, Texas. He was an NFL running back who played

for the Cleveland Browns (1976-77) and the Houston Oilers (1978). Duncan suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Duncan has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, irritability, and numbness/tingling in his neck and cervical spine. As a result of Duncan's impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

70. Plaintiff Jon "Reggie" Dupard ("Dupard") is 48 years old and resides in Duncanville, Texas. He was an NFL running back for the New England Patriots (1986-89) and the Washington, Redskins (1989-90). Dupard suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Dupard has experienced cognitive difficulties.

71. Plaintiff Kenneth Easley, Jr. ("Easley") is 52 years old and resides with his wife, Plaintiff Gail Easley, in Norfolk, Virginia. He was an NFL defensive back who played for the Seattle Seahawks (1981-87). He was a five-time Pro Bowl selection, four-time All-Pro, was the 1984 NFL Defensive Player of the Year, and a member of the NFL's 1980s All-Decade Team. Easley suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Easley has experienced cognitive and other difficulties including, but not limited to, dizziness, loss of memory, sleep problems, and numbness/tingling in his neck and cervical spine. As a result of Easley's impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

72. Plaintiff Scott Eaton ("Eaton") is 67 years old and resides with his wife, Plaintiff Cynthia Eaton, in Bellevue, Washington. He was an NFL defensive back for the New

York Giants (1967-72). Eaton suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Eaton has experienced cognitive difficulties including, but not limited to, double vision. As a result of Eaton's impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

73. Plaintiff Brad Edelman ("Edelman") is 51 years old and resides in New Orleans, Louisiana. He was an NFL offensive guard for the New Orleans Saints (1982-90). He was selected to one Pro Bowl in 1987. Edelman suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Edelman has experienced cognitive and other difficulties including, but not limited to, dizziness, depression, suicidal thoughts, fatigue, sleep problems, neck and cervical arthritis and associated numbness/tingling.

74. Plaintiff Craig Ellis ("Ellis") is 51 years old and resides in Alberta, Canada. He was an NFL running back for the Miami Dolphins (1986) and the Los Angeles Raiders (1987). Ellis suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Ellis has experienced cognitive difficulties.

75. Plaintiff Ken Fantetti ("Fantetti") is 54 years old and resides with his wife, Plaintiff Kendra Rae Fantetti, in Portland Oregon. He was an NFL linebacker who played for the Detroit Lions (1979-85). Fantetti suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Fantetti has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, depression, fatigue, sleep problems, irritability, neck and cervical arthritis and

associated numbness/tingling. As a result of Fantetti's impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

76. Plaintiff Joe Ferguson, Jr. ("Ferguson") is 61 years old and resides with his wife, Plaintiff Sandy Ferguson, in Bella Vista, Arizona. He was an NFL quarterback for the Buffalo Bills (1973-1984), the Tampa Bay Buccaneers (1988-89), and the Indianapolis Colts (1990). In 1993, Ferguson was inducted into the Buffalo Bills Wall of Fame and his number 12 jersey was retired in honor of both Ferguson and fellow quarterback Jim Kelly. Ferguson suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Ferguson has experienced cognitive difficulties including, but not limited to, headaches, dizziness, loss of memory, and irritability. As a result of Ferguson's impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

77. Plaintiff Steve Foley ("Foley") is 58 years old and resides with his wife, Plaintiff Cindy Foley, in Centennial, Colorado. He was an NFL defensive back for the Denver Broncos (1976-86). He holds the Denver Broncos team record for career interceptions with 44, played in two Super Bowls (Super Bowls XII and XXI) while a member of the Broncos, and was an All-Pro selection in 1978. Foley suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Foley has experienced cognitive difficulties including, but not limited to, loss of memory, fatigue, and sleep problems. As a result of Foley's impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

78. Plaintiff Lee Folkins ("Folkins") is 72 years old and resides with his wife, Plaintiff Yolanda Folkins, in Orlando, Florida. He was an NFL tight end who played for the

Green Bay Packer (1961), the Dallas Cowboys (1962-64), and the Pittsburgh Steelers (1965). He was selected to play in the 1963 Pro Bowl. Folkins suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Folkins has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, irritability, and neck and cervical spine numbness/tingling. As a result of Folkins's impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

79. Plaintiff Fred Forsberg ("Forsberg") is 67 years old and resides with his wife, Plaintiff Kaye Forsberg, in Sammamish, Washington. He was an NFL linebacker who played for the Denver Broncos (1968-73), the Buffalo Bills (1973), and the San Diego Chargers (1974). Forsberg suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Forsberg has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, neck and cervical arthritis and associated numbness/tingling. As a result of Forsberg's impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

80. Plaintiff Timothy Fox ("Fox") is 58 years old and resides with his wife, Plaintiff Debra Fox, in Hull, Massachusetts. He was an NFL defensive back who played for the New England Patriots (1976-81), the San Diego Chargers (1982-84), the Los Angeles Rams (1985-86), and the Cleveland Browns (1987). He was selected to one Pro Bowl in 1980. Fox suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Fox has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, irritability, neck and cervical

arthritis and associated numbness/tingling. As a result of Fox's impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

81. Plaintiff Phillip Freeman, III ("Freeman") is 49 years old and resides with his wife, Plaintiff Maria Freeman, in Tampa, Florida. He was an NFL wide receiver and kick returner for the Tampa Bay Buccaneers (1985-87). Freeman suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Freeman has experienced cognitive difficulties including, but not limited to, headaches, dizziness, loss of memory. As a result of Freeman's impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

82. Plaintiff Darrell Fullington ("Fullington") is 47 years old and resides with his wife, Plaintiff Tracey Fullington, in Weston, Florida. He was an NFL defensive back for the Minnesota Vikings (1988-90), the New England Patriots (1991), and the Tampa Bay Buccaneers (1991-92). Fullington suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Fullington has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, depression, sleep problems and neck/cervical spine numbness and tingling. As a result of Fullington's impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

83. Plaintiff Derrick Gaffney ("Gaffney") is 56 years old and resides in Jacksonville, Florida. He was an NFL wide receiver for the New York Jets (1978-87). Gaffney suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Gaffney has experienced cognitive and other difficulties

including, but not limited to, headaches, dizziness, loss of memory, impulse control problems, neurological disorder, depression, suicidal thoughts, fatigue, sleep problems, irritability, neck and cervical arthritis and associated numbness/tingling, blurred vision, and ringing in his ears.

84. Plaintiff Lawrence Gagner (“Gagner”) is 68 years old and resides with his wife, Plaintiff Doris Gagner, in Tampa, Florida. He was an NFL offensive guard for the Pittsburgh Steelers (1966-69) and the Kansas City Chiefs (1972). Gagner suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Gagner has experienced cognitive and other difficulties including, but not limited to, headaches, hearing loss, and neck/cervical spine numbness/tingling. As a result of Gagner’s impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

85. Plaintiff James Garcia (“Garcia”) is 67 years old and resides in San Antonio, Texas. He was an NFL defensive end who played for the Cleveland Browns (1965), the New York Giants (1966), the New Orleans Saints (1967), and the Atlanta Falcons (1968). Garcia suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Garcia has experienced cognitive difficulties.

86. Plaintiff Hubert Ginn (“Ginn”) is 65 years old and resides in Savannah, Georgia. He was an NFL running back who played for the Miami Dolphins (1970-73, 1974-75), the Baltimore Colts (1973), and the Oakland Raiders (1976-78), and was a member of two Super Bowl Champion teams, one with the Miami Dolphins (Super Bowl VII), and one with the Oakland Raiders (Super Bowl XI). Ginn suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Ginn has experienced cognitive and other difficulties including but not limited to, headaches, dizziness,

loss of memory, dementia, impulse control problems, Alzheimer's, neurological disorder, depression, fatigue, sleep problems, irritability, and neck/cervical spine arthritis and associated numbness and tingling.

87. Plaintiff Randy Gradishar ("Gradishar") is 60 years old and resides with his wife, Plaintiff Beverly Gradishar, in Castle Pines North, Colorado. He was an NFL linebacker who played for the Denver Broncos (1974-83). He was a seven-time Pro Bowl selection (1975, 1977-79, 1981-83), a five-time first-team All Pro (1977-81), and two-time Denver Broncos team MVP. Gradishar suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Gradishar has experienced cognitive and other difficulties including but not limited to, loss of memory, depression, fatigue, sleep problems, irritability, and neck/cervical spine arthritis and associated numbness and tingling. As a result of Gradishar's impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

88. Plaintiff Melvin Gray ("Gray") is 63 years old and resides with his wife, Plaintiff Rhonda Gray, in Rockford, Illinois. He was an NFL wide receiver who played for the St. Louis Cardinals (1971-82). He was a four-time Pro Bowl selection (1974-77), and was an All-Pro selection in 1974. Gray suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Gray has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, sleep problems, and neck/cervical spine numbness and tingling. As a result of Gray's impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

89. Plaintiff Donald Greco (“Greco”) is 52 years old and resides with his wife, Plaintiff Diana Greco, in O’Fallon, Missouri. He was an NFL offensive guard who played for the Detroit Lions (1982-85). Greco suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Greco has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, impulse control problems, depression, sleep problems, irritability, and neck/cervical spine arthritis and associated numbness and tingling. As a result of Greco’s impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

90. Plaintiff Donnie Green (“D. Green”) is 63 years old and resides in Hagerstown, Maryland. He was an NFL tackle who played for the Buffalo Bills (1971-76), the Philadelphia Eagles (1977), and the Detroit Lions (1978). D. Green suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, D. Green has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, fatigue, sleep problems, and numbness/tingling in neck and cervical spine.

91. Plaintiff Jacquez Green (“J. Green”) is 36 years old and resides in Florida. He was an NFL wide receiver who played for the Tampa Bay Buccaneers (1998-2001), the Washington Redskins (2002), and the Detroit Lions (2002). J. Green suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, J. Green has experienced cognitive difficulties.

92. Plaintiff Willie Green (“Green”) is 45 years old and resides with his wife, Plaintiff Dena Green, in Shelby, North Carolina. He was an NFL wide receiver who played for

the Detroit Lions (1991-93), the Tampa Bay Buccaneers (1994), the Carolina Panthers (1995-96), and the Denver Broncos (1997-98). Green suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Green has experienced cognitive difficulties including, but not limited to, headaches, loss of memory, depression, and sleep problems. As a result of Green's impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

93. Plaintiff Robert Gregor ("Gregor") is 55 years old and resides with his wife, Plaintiff Audrey Gregor in Redmond, Washington. He was an NFL defensive back for the San Diego Chargers (1981-84). Gregor suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Gregor has experienced cognitive and other difficulties including, but not limited to headaches, dizziness, loss of memory, depression, suicidal thoughts, sleep problems, and neck and cervical arthritis and associated numbness/tingling. As a result of Gregor's impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

94. Plaintiff Alfred Gross ("Gross") is 50 years old and resides in Phoenix, Arizona. He was an NFL defensive back for the Cleveland Browns (1983-87). Gross suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Gross has experienced cognitive and other difficulties including, but not limited to, headaches, loss of memory, impulse control problems, neurological disorder, depression, suicidal thoughts, fatigue, sleep problems, irritability, neck and cervical arthritis and associated numbness/tingling.

95. Plaintiff Dale Hackbart (“Hackbart”) is 73 years old and resides with his wife, Plaintiff Eileen Hackbart, in Lafayette, Colorado. He was an NFL defensive back for the Green Bay Packers (1960-61), the Washington Redskins (1961-63), the Minnesota Vikings (1966-70), the St. Louis Cardinals (1971-72), and the Denver Broncos (1973). Hackbart suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Hackbart has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, fatigue, sleep problems, irritability, neck and cervical arthritis and associated numbness/tingling. As a result of Hackbart’s impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

96. Plaintiff Bobby Harden, Jr. (“Harden”) is 44 years old and resides in Lauderhill, Florida. He was an NFL defensive back who played for the Miami Dolphins (1990-93). Harden suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Harden has experienced cognitive difficulties including, but not limited to, dizziness, loss of memory, and irritability.

97. Plaintiff Cedrick Hardman (“Hardman”) is 63 years old and resides in Laguna Beach, California. He was an NFL defensive end who played for the San Francisco 49ers (1970-79), and the Oakland Raiders (1980-81). He is the current all-time sack leader for the San Francisco 49ers franchise, and was a two-time Pro Bowl selection in 1971 and 1975. Hardman was a member of the Raiders’ Super Bowl XV Championship team. Hardman suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Hardman has experienced cognitive and other difficulties

including, but not limited to, loss of memory, neck and cervical arthritis and associated numbness/tingling.

98. Plaintiff Dennis Harrah (“Harrah”) is 58 years old and resides with his wife, Plaintiff Teresa Harrah, in Charleston, West Virginia. He was an NFL offensive guard for the Los Angeles Rams (1975-87). He was a six-time Pro Bowl selection (1978-80, 1985-87), and was voted All-Pro (1986). Harrah suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Harrah has experienced cognitive difficulties. As a result of Harrah’s impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

99. Plaintiff Charley Harraway (“Harraway”) is 67 years old and resides with his wife, Plaintiff Gail Harraway, in Sarasota, Florida. He was an NFL running back who played for the Cleveland Browns (1966-68) and the Washington Redskins (1969-73). In 1966, Harraway was selected by teams in both the AFL and NFL drafts. Harraway suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Harraway has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, impulse control problems, suicidal thoughts, fatigue, sleep problems, irritability, neck and cervical arthritis and associated numbness/tingling, and has recently been diagnosed with “early onset” Alzheimer’s. As a result of Harraway’s impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

100. Plaintiff James Harrell (“Harrell”) is 54 years old and resides with his wife, Plaintiff Maria Yoder, in Lutz, Florida. He was an NFL linebacker for the Detroit Lions

(1979-86) and the Kansas City Chiefs (1987). Harrell suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Harrell has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, depression, fatigue, sleep problems, irritability, neck and cervical arthritis and associated numbness/tingling. As a result of Harrell's impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

101. Plaintiff Cliff Harris ("Harris") is 62 years old and resides with his wife, Plaintiff Karen Harris, in Rockwall, Texas. He was an NFL defensive back who played for the Dallas Cowboys (1970-79). He was a six-time Pro Bowl selection (1974-79) and was a four-time All-Pro selection (1975-78). He was voted as a member of the NFL's 1970s All-Decade Team, played in five Super Bowls and is a member of the Dallas Cowboys' prestigious Ring of Honor. In 2004 Harris was a finalist for the Pro Football Hall of Fame. Harris suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Harris has experienced cognitive difficulties. As a result of Harris's impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

102. Plaintiff Chilton "Alex" Hawkins ("Hawkins") is 74 years old and resides with his wife, Plaintiff Charlotte Hawkins, in Denmark, South Carolina. He was an NFL running back and wide receiver who played for the Baltimore Colts (1959-65, 1967-68) and the Atlanta Falcons (1966-67). He was a member of the 1959 NFL Champion Baltimore Colts. Hawkins suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Hawkins has experienced cognitive and other difficulties

including, but not limited to, dizziness, loss of memory, chronic brain injury, dementia, impulse control problems, neurological disorder, fatigue, sleep problems, irritability, and neck/cervical spine arthritis and associated numbness and tingling. As a result of Hawkins' impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

103. Plaintiff Victor Hicks ("Hicks") is 54 years old and resides with his wife, Plaintiff Alberta Hicks, in Carrollton, Texas. He was an NFL tight end who played for the Los Angeles Rams (1980). Hicks suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Hicks has experienced cognitive difficulties. As a result of Hicks's impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

104. Plaintiff Kent Hill ("Hill") is 55 years old and resides in Fayetteville, Georgia. He was an NFL offensive guard who played for the Los Angeles Rams (1979-86) and the Houston Oilers (1986-87). He was a five-time Pro Bowl selection (1980, 1982-85). Hill suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Hill has experienced cognitive and other difficulties including, but not limited to, loss of memory, fatigue, sleep problems, irritability, and numbness/tingling in his neck and cervical spine.

105. Plaintiff Don Horn ("Horn") is 66 years old and resides with his wife, Plaintiff Barbara Horn, in Colorado Springs, Colorado. He was an NFL quarterback who played for the Green Bay Packers (1967-70), the Denver Broncos (1971-72), and the Cleveland Browns (1973-74). Horn suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Horn has experienced cognitive and other

difficulties including, but not limited to, dizziness, impulse control problems, depression, fatigue, sleep problems, irritability, and numbness/tingling in his neck and cervical spine. As a result of Horn's impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

106. Plaintiff Ronnie Hornsby ("Hornsby") is 62 years old and resides with his wife, Plaintiff Charlotte Hornsby, in Frank Clinton, Mississippi. He was an NFL middle linebacker who played for the New York Giants (1971-74) and the New Orleans Saints (1976). Hornsby suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Hornsby has experienced cognitive difficulties. As a result of Hornsby's impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

107. Plaintiff James Hough ("Hough") is 55 years old and resides with his wife, Plaintiff Sheryl Hough, in Chaska, Minnesota. He was an NFL offensive guard who played for the Minnesota Vikings (1978-86). Hough suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Hough has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, neurological disorder fatigue, sleep problems, irritability, neck and cervical spine arthritis and associated numbness/tingling. As a result of Hough's impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

108. Plaintiff John Houser ("Houser") is 76 years old and resides with his wife, Plaintiff Mary Alison Houser, in Solvang, California. He was an NFL offensive lineman who played for the Los Angeles Rams (1957-59), the Dallas Cowboys (1960-61), and the St. Louis

Cardinals (1963). Houser suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Houser has experienced cognitive difficulties. As a result of Houser's impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

109. Plaintiff Paul Howard ("Howard") is 61 years old and resides with his wife, Plaintiff Jacque Howard, in Aurora, Colorado. He was an NFL offensive guard who played for the Denver Broncos (1973-86). Howard suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Howard has experienced cognitive and other difficulties, including, but not limited to, headaches, dizziness, loss of memory, depression, sleep problems, irritability, and neck/cervical spine arthritis and associated numbness and tingling. As a result of Howard's impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

110. Plaintiff Delles Howell ("Howell") is 63 years old and resides with his wife, Plaintiff Shelia Howell, in Monroe, Louisiana. He was an NFL defensive back who played for the New Orleans Saints (1970-72) and the New York Jets (1973-75). Howell suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Howell has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, fatigue, sleep problems, neck and cervical spine arthritis and associated numbness/tingling. As a result of Howell's impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

111. Plaintiff Ken Huff (“Huff”) is 59 years old and resides in Chapel Hill, North Carolina. He was an NFL offensive guard who played for the Baltimore Colts (1975-82) and the Washington Redskins (1983-1985). Huff suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Huff has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, sleep problems, neck and cervical spine arthritis and associated numbness/tingling.

112. Plaintiff Michael Hull (“Hull”) is 67 years old and resides with his wife, Plaintiff Constance Hull, in San Clemente, California. He was an NFL running back who played for the Chicago Bears (1968-70) and the Washington Redskins (1971-74). Hull suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Hull has experienced cognitive difficulties. As a result of Hull’s impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

113. Plaintiff David Humm (“Humm”) is 60 years old and resides in Las Vegas, Nevada. He was an NFL quarterback who played for the Oakland Raiders (1975-79), the Buffalo Bills (1980), the Baltimore Colts (1981-82), and the Los Angeles Raiders (1983-84). He is a two-time Super Bowl Champion with the Oakland/Los Angeles Raiders (Super Bowls XI and XVIII). Humm suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Humm has experienced cognitive difficulties, including but not limited to, headaches, loss of memory, sleep problems, and neck/cervical spine arthritis and associated numbness/tingling.

114. Plaintiff Bill Hurley (“Hurley”) is 54 years old and resides in Bethel Park, Pennsylvania. He was an NFL defensive back who played for the New Orleans Saints (1982-83), and the Buffalo Bills (1983). Hurley suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Hurley has experienced cognitive difficulties.

115. Plaintiff Darrell Irvin (“Irvin”) is 55 years old and resides with his wife, Plaintiff Sandra Irvin, in Redmond, Washington. He was an NFL defensive lineman who played for the Buffalo Bills (1980-82) and the Seattle Seahawks (1983). Irvin suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Irvin has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, dementia, impulse control problems, neurological disorder, depression, suicidal thoughts, fatigue, sleep problems, irritability, and neck and cervical spine arthritis and associated numbness/tingling. As a result of Irvin’s impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

116. Plaintiff Brad Jackson (“Jackson”) is 36 years old and resides with his wife, Plaintiff Amy Perez-Jackson, in Pikesville, Maryland. He was an NFL linebacker who played for the Miami Dolphins (1998), the Baltimore Ravens (1998-01), and the Carolina Panthers (2002). Jackson was a member of the Ravens’ Super Bowl XXXV Championship team. Jackson suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Jackson has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, fatigue, sleep problems, irritability, neck and cervical spine arthritis and associated numbness/tingling.

As a result of Jackson's impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

117. Plaintiff Calvin Jackson ("C. Jackson") is 39 years old and resides in Pompano, Florida. He was an NFL defensive back who played for the Miami Dolphins (1994-99). C. Jackson suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, C. Jackson has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, impulse control problems, depression, fatigue, sleep problems, irritability, and neck and cervical spine numbness/tingling.

118. Plaintiff Vestee Jackson ("V. Jackson") is 48 years old and resides in Lake Mary, Florida. He was an NFL cornerback who played for the Chicago Bears (1986-90) and the Miami Dolphins (1991-93). V. Jackson suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, V. Jackson has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, depression, suicidal thoughts, fatigue, sleep problems, irritability, neck and cervical arthritis and associated numbness/tingling

119. Plaintiff J. Bruce Jarvis ("Jarvis") is 62 years old and resides with his wife, Plaintiff Cynthia Jarvis, in Sammamish, Washington. He was an NFL center who played for the Buffalo Bills (1971-74). Jarvis suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Jarvis has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, impulse control problems, depression, fatigue, sleep problems, irritability, neck and cervical arthritis and associated numbness/tingling. As a result of Jarvis's impairments, his

wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

120. Plaintiff Leon “Ray” Jarvis (“R. Jarvis”) is 62 years old and resides with his wife, Plaintiff Diane Jarvis, in Brookfield, Wisconsin. He was an NFL wide receiver who played for the Atlanta Falcons (1971-72), the Buffalo Bills (1973), the Detroit Lions (1974-78), and the New England Patriots (1979). R. Jarvis suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, R. Jarvis has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, depression, fatigue, sleep problems, irritability, neck and cervical spine arthritis and associated numbness/tingling. As a result of R. Jarvis’s impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

121. Plaintiff Noel Jenke (“Jenke”) is 64 years old and resides in Brookfield, Wisconsin. He was an NFL linebacker for the Minnesota Vikings (1971), the Atlanta Falcons (1972), and the Green Bay Packers (1973-7). Jenke suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Jenke has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, and stroke (2008).

122. Plaintiff Anthony “Tony” Jeter (“Jeter”) is 67 years old and resides in Pittsburgh, Pennsylvania. He was an NFL tight end who played for the Pittsburgh Steelers (1966-67). Jeter suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Jeter has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, impulse control

problems, depression, fatigue, sleep problems, irritability, neck and cervical spine arthritis and associated numbness/tingling.

123. Plaintiff Jim Jodat (“Jodat”) is 58 years old and resides in Lake Forest, California. He was an NFL running back who played for the Los Angeles Rams (1977-79), the Seattle Seahawks (1980-81), and the San Diego Chargers (1982-83). Jodat suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Jodat has experienced cognitive and other difficulties including, but not limited to, loss of memory, and neck and cervical spine arthritis and associated numbness/tingling.

124. Plaintiff Jack Johnson (“Johnson”) is 78 years old and resides with his wife, Plaintiff Eileen Johnson, in Tucson, Arizona. He was an NFL defensive back who played for the Chicago Bears (1957-59), the Buffalo Bills (1960-61), and the Dallas Texans (1961). Johnson suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Johnson has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, chronic brain injury, dementia, impulse control problems, CTE, depression, suicidal thoughts, fatigue, hearing loss, and neck and cervical spine numbness/tingling. As a result of Johnson’s impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

125. Plaintiff Olrick Johnson, Jr. (“O. Johnson”) is 34 years old and resides with his wife, Plaintiff Amirah Johnson, in Miami, Florida. He was an NFL linebacker who played for the New York Jets (1999), the Minnesota Vikings (1999), and the New England Patriots (2000). O. Johnson suffered repeated and chronic head impacts during his career in the

NFL and is at an increased risk of latent brain disease. As a result, O. Johnson has experienced cognitive and other difficulties including, but not limited to, seizures, epilepsy, headaches, dizziness, loss of memory, depression, fatigue, sleep problems, irritability, neck and cervical spine arthritis and associated numbness/tingling. As a result of O. Johnson's impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

126. Plaintiff Troy Johnson ("T. Johnson") is 49 years old and resides in Chauvin, Louisiana. He was an NFL wide receiver who played for the St. Louis Cardinals (1986-87), the Pittsburgh Steelers (1988), the Detroit Lions (1989), and the San Diego Chargers (1990). T. Johnson suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, T. Johnson has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, impulse control problems, depression, fatigue, sleep problems, irritability, neck and cervical spine arthritis and associated numbness/tingling.

127. Plaintiff Trumaine Johnson ("Tru. Johnson") is 51 years old and resides with his wife, Plaintiff Lawand Johnson, in Baton Rouge, Louisiana. He was an NFL wide receiver who played for the San Diego Chargers (1985-86) and the Buffalo Bills (1987-89). Tru. Johnson suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Tru. Johnson has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, depression, suicidal thoughts, fatigue, sleep problems, irritability, neck and cervical spine arthritis and associated numbness/tingling. As a result of Tru. Johnson's impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

128. Plaintiff Aaron Jones II (“Jones”) is 44 years old and resides with his wife, Plaintiff Jannita Jones, in Orlando, Florida. He was an NFL defensive end for the Pittsburgh Steelers (1988-92), the New England Patriots (1993-95), and the Miami Dolphins (1996). Jones suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Jones has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, impulse control problems, neurological disorder, depression, suicidal thoughts, fatigue, sleep problems, irritability, and numbness/tingling in his neck and cervical spine. As a result of Jones’ impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

129. Plaintiff James Jones (“J. Jones”) is 50 years old and resides in Tampa, Florida. He was an NFL fullback who played for the Detroit Lions (1983-88, 93) and the Seattle Seahawks (1989-92). Jones suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Jones has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, sleep problems, irritability, neck and cervical arthritis and associated numbness/tingling. As a result of J. Jones’ impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

130. Plaintiff Kenneth Jones (“K. Jones”) is 59 years old and resides with his wife, Plaintiff Gloria Jones, in Niagara Falls, New York. He was an NFL defensive end who played for the Buffalo Bills (1976-86) and the New York Jets (1987). K. Jones suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, K. Jones has experienced cognitive and other difficulties including, but not

limited to, headaches, loss of memory, sleep problems, and neck and cervical arthritis. As a result of K. Jones' impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

131. Plaintiff Steve Jones ("S. Jones") is 60 years old and resides with his wife, Plaintiff Sandra Jones, in St. Louis, Missouri. He was an NFL running back who played for the Buffalo Bills (1973-74) and the St. Louis Cardinals (1974-78). S. Jones suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, S. Jones has experienced cognitive and other difficulties including, but not limited to, dizziness, loss of memory, fatigue, sleep problems, irritability, neck and cervical spine numbness/tingling. As a result of S. Jones' impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

132. Plaintiff Joseph Kapp ("Kapp") is 73 years old and resides with his wife, Plaintiff Jennifer Kapp, in Los Gatos, California. He was an NFL quarterback who played for the Minnesota Vikings (1967-69), and the Boston Patriots (1970). Kapp was selected to the 1969 Pro Bowl. In September 1969, Kapp set an NFL record by throwing 7 touchdown passes in a single game. Kapp led the Vikings to Super Bowl IV, where they lost to the Kansas City Chiefs. Kapp suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Kapp has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, dementia, impulse control problems, neurological disorder, depression, fatigue, sleep problems, irritability, neck and cervical arthritis and associated numbness/tingling. As a result of Kapp's impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

133. Plaintiff Ernest Kellermann (“Kellermann”) is 68 years old and resides with his wife, Plaintiff Maryann Kellermann, in Aurora, Ohio. He was an NFL defensive back who played for the Cleveland Browns (1966-71), the Cincinnati Bengals (1972), and the Buffalo Bills (1973). He was selected to one Pro Bowl in 1968. Kellermann suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Kellermann has experienced cognitive difficulties. As a result of Kellermann’s impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

134. Plaintiff Louis Kirouac (“Kirouac”) is 71 years old and resides with his wife, Plaintiff Doris Kirouac, in Georgia. He was an NFL offensive tackle who played for the New York Giants (1963), Baltimore Colts (1964) and the Atlanta Falcons (1966-67). Kirouac suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Kirouac has experienced cognitive and other difficulties, including but not limited to, headaches, dizziness, sleep problems, and neck and cervical spine numbness/tingling. As a result of Kirouac’s impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

135. Plaintiff Mark Koncar (“Koncar”) is 58 years old and resides with his wife, Plaintiff Karen Koncar, in Alpine, Utah. He was an NFL offensive tackle who played for the Green Bay Packers (1976-81) and the Houston Oilers (1982-83). Koncar suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Koncar has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, dementia, depression, suicidal thoughts, fatigue, sleep problems, irritability, and neck and cervical spine arthritis. As a result of Koncar’s

impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

136. Plaintiff Mervin Krakau (“Krakau”) is 60 years old and resides with his wife, Plaintiff Barbara Jo Krakau, in Guthrie Center, Iowa. He was an NFL linebacker who played for the Buffalo Bills (1973-78) and the New England Patriots (1978). Krakau suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Krakau has experienced cognitive difficulties. As a result of Krakau’s impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

137. Plaintiff Paul Krause (“Krause”) is 69 years old and resides with his wife, Plaintiff Pamela Krause, in Lakeville, Minnesota. He was an NFL defensive back for the Washington Redskins (1964-67) and the Minnesota Vikings (1968-79). He was an eight-time selection to the Pro Bowl (1964-65, 1969, 1971-75), was an eight-time All-Pro selection (1964-65, 1968-73, 1975), holds the NFL record for career interceptions (81), and was a member of four Super Bowl teams (IV, VIII, IX, XI). He was voted into the Pro Football Hall of Fame in 1998. Krause suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Krause has experienced cognitive difficulties. As a result of Krause’s impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

138. Plaintiff Robert “Bob” Kroll (“Kroll”) is 61 years old and resides in Longwood, Florida. He was an NFL defensive back who played for the Green Bay Packers (1972). Kroll suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Kroll has experienced cognitive difficulties.

139. Plaintiff Charles Krueger (“Krueger”) is 74 years old and resides with his wife, Plaintiff Kristen Krueger, in Clayton, California. He was an NFL defensive tackle who played for the San Francisco 49ers (1959-73). He was a two-time Pro Bowl selection, and three-time All-Pro. Krueger suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Krueger has experienced cognitive difficulties. As a result of Krueger’s impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

140. Plaintiff Thaddeus “Ted” Kwalick, Jr. (“Kwalick”) is 64 years old and resides in Santa Clara, California. He was an NFL tight end who played for the San Francisco 49ers (1969-74) and the Oakland Raiders (1975-77). He was a three-time Pro Bowl selection (1971-73). Kwalick suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Kwalick has experienced cognitive and other difficulties, including, but not limited to, headaches, fatigue, sleep problems, and neck/cervical spine arthritis and associated numbness and tingling.

141. Plaintiff Bruce Laird (“Laird”) is 61 years old and resides with his wife, Plaintiff Mary Laird, in Towson, Maryland. He was an NFL defensive back who played for the Baltimore Colts (1972-81) and the San Diego Chargers (1982-83). Laird was selected to the Pro Bowl in 1972, and was voted All-Pro that same year. Laird suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Laird has experienced cognitive and other difficulties including, but not limited to, headaches, loss of memory, depression, sleep problems, and neck and cervical numbness/tingling. As a result of Laird’s impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

142. Plaintiff MacArthur Lane (“Lane”) is 69 years old and resides with his wife, Plaintiff Edna Lane, in Oakland, California. He was an NFL running back who played for the St. Louis Cardinals (1968-71), the Green Bay Packers (1972-74), and the Kansas City Chiefs (1975-78). Lane was selected to the 1970 Pro Bowl. Lane suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Lane has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, depression, fatigue, sleep problems, irritability, neck and cervical spine arthritis and associated numbness/tingling. As a result of Lane’s impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

143. Plaintiff Gene Lang (“Lang”) is 49 years old and resides with his wife, Plaintiff B. Mercedes Lang, in Denver, Colorado. He was an NFL running back who played for the Denver Broncos (1984-87) and the Atlanta Falcons (1988-90). Lang suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Lang has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, depression, fatigue, sleep problems, irritability, numbness, and tingling in his neck and cervical spine. As a result of Lang’s impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

144. Plaintiff William “Bill” Laskey (“Laskey”) is 69 years old and resides with his wife, Plaintiff Dona Laskey, in Leland, Michigan. He was an NFL linebacker who played for the Buffalo Bills (1965), the Oakland Raiders (1966-70), the Baltimore Colts (1971-72), and the Denver Broncos (1974). He was selected AFL All-Star honors in 1965. Laskey

suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Laskey has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, impulse control problems, depression, sleep problems, irritability, neck and cervical spine arthritis and associated numbness/tingling. As a result of Laskey's impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

145. Plaintiff Peter Lazetich ("Lazetich") is 61 years old and resides with his wife, Plaintiff Cynthia Lazetich, in Reno, Nevada. He was an NFL defensive end who played for the San Diego Chargers (1972-75) and the Philadelphia Eagles (1976-78). Lazetich suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Lazetich has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, impulse control problems, depression, fatigue, sleep problems, irritability, neck and cervical spine arthritis and associated numbness/tingling. As a result of Lazetich's impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

146. Plaintiff Jack Lee ("Lee") is 72 years old and resides in with his wife Joan Lee in Houston, Texas. He was an NFL quarterback who played for the Houston Oilers (1960-63, 1966), the Denver Broncos (1964-65), and the Kansas City Chiefs (1967-70). He was a member of three AFL Championship teams, and one Super Bowl Champion (Super Bowl IV). He is one of only twenty men who played all ten years of the AFL's existence. Lee suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Lee has experienced cognitive and other difficulties including, but not limited to, loss of memory, dementia, Alzheimer's, neurological disorder, sleep

problems, and irritability. As a result of Lee's impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

147. Plaintiff Frank Lewis ("Lewis") is 64 years old and resides with his wife, Plaintiff Norma Lewis, in Houma, Louisiana. He was an NFL wide receiver who played for the Pittsburgh Steelers (1971-77) and the Buffalo Bills (1978-83). He was selected to one Pro Bowl in 1981, and was a two-time Super Bowl Champion with the Steelers (Super Bowls X and XI). Lewis suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Lewis has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, fatigue, sleep problems, irritability, neck and cervical spine arthritis and associated numbness/tingling. As a result of Lewis's impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

148. Plaintiff Thomas Lott ("Lott") is 54 years old and resides in Richardson, Texas. He was an NFL running back who played for the St. Louis Cardinals (1979). Lott suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Lott has experienced cognitive difficulties.

149. Plaintiff Warren Loving ("Loving") is 51 years old and resides with his wife, Plaintiff Chalonda Loving, in Jersey City, New Jersey. He was an NFL running back who played for the Buffalo Bills (1987). Loving suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Loving has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, impulse control problems, depression, suicidal thoughts, sleep problems, and neck and cervical spine numbness/tingling. As a result of Loving's impairments, his wife has

been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

150. Plaintiff Robert Lurtsema (“Lurtsema”) is 69 years old and resides with his wife, Plaintiff Aloise Lurtsema, in Lakeville, Minnesota. He was an NFL defensive lineman who played for the Baltimore Colts (1966), New York Giants (1967-71), the Minnesota Vikings (1972-76), and the Seattle Seahawks (1976-77). He played in two Super Bowls as a member of the Vikings (Super Bowls VIII and IX). Lurtsema suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Lurtsema has experienced cognitive difficulties including, but not limited to, headaches, dizziness, loss of memory, fatigue, sleep problems, and irritability. As a result of Lurtsema’s impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

151. Plaintiff Donald Macek (“Macek”) is 57 years old and resides with his wife, Plaintiff Jan Macek, in Escondido, California. He was an NFL center who played for the San Diego Chargers (1976-89). In 2004 Macek was voted into the San Diego Chargers’ Hall of Fame and is a member of the 50 Greatest Chargers team. Macek suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Macek has experienced cognitive and other difficulties including, but not limited to, headaches, loss of memory, sleep problems, irritability, neck and cervical spine arthritis and associated numbness/tingling. As a result of Macek’s impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

152. Plaintiff Donald Manoukian (“Manoukian”) is 77 years old and resides in Reno, Nevada. He was an NFL offensive guard who played for the Oakland Raiders (1960).

Manoukian suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Manoukian has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, vertigo, sleep problems, neck and cervical spine arthritis and associated numbness/tingling.

153. Plaintiff Rod Martin (“Martin”) is 57 years old and resides with his wife, Plaintiff Regina Martin, in Manhattan Beach, California. He was an NFL linebacker for the Oakland/L.A. Raiders (1977-88). Martin was a member of the Raiders’ Super Bowl XV and XVIII Championship teams, and holds the Super Bowl record for interceptions with three in one game. He was a two-time selection to the Pro Bowl (1983-84), and was a two-time All-Pro selection (1982-84). Martin suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Martin has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, irritability, and numbness/tingling in neck and cervical spine. As a result of Martin’s impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

154. Plaintiff William Matan (“Matan”) is 68 years old and resides with his wife, Plaintiff Janice Matan, Omaha, Nebraska. He was an NFL defensive end who played for the New York Giants (1966). Matan suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Matan has experienced cognitive difficulties. As a result of Matan’s impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

155. Plaintiff Donald McCauley (“McCauley”) is 62 years old and resides with his wife, Plaintiff Tracey McCauley, in Hillsborough, North Carolina. He was an NFL running back who played for the Baltimore Colts (1971-81). McCauley suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, McCauley has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, depression, fatigue, sleep problems, irritability, and neck and cervical arthritis and associated numbness/tingling. As a result of McCauley’s impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

156. Plaintiff Leonard “Bubba” McDowell, Jr. (“McDowell”) is 44 years old and resides with his wife, Plaintiff Candice McDowell, in Richmond, Texas. He was an NFL safety who played for the Houston Oilers (1989-94) and the Carolina Panthers (1995). McDowell suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, McDowell has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, fatigue, sleep problems, neck and cervical arthritis and associated numbness/tingling. As a result of McDowell’s impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

157. Plaintiff Dennis McKnight (“McKnight”) is 52 years old and resides with his wife, Plaintiff Jodi McKnight, in San Diego, California. He was an NFL offensive guard who played for the San Diego Chargers (1982-89), the Detroit Lions (1990-92), and the Philadelphia Eagles (1991). McKnight suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, McKnight has

experienced cognitive and other difficulties including, but not limited to, headaches, loss of memory, depression, suicidal thoughts, sleep problems, irritability, neck and cervical spine arthritis and associated numbness/tingling. As a result of McKnight's impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

158. Plaintiff Michael Meade ("Meade") is 52 years old and resides with his wife, Plaintiff Gloria Meade, in Dover, Delaware. He was an NFL running back who played for the Green Bay Packers (1982-83) and the Detroit Lions (1984-85). Meade suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Meade has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, fatigue, sleep problems, irritability, and neck and cervical spine numbness/tingling. As a result of Meade's impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

159. Plaintiff Jon Melander ("Melander") is 44 years old and resides with his wife, Plaintiff Beth-Anne Melander, in Victoria, Minnesota. He was an NFL offensive guard who played for the New England Patriots (1991), the Cincinnati Bengals (1992) and the Denver Broncos (1993-94). Melander suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Melander has experienced cognitive and other difficulties including, but not limited to, loss of memory, depression, fatigue, irritability, neck and cervical arthritis and associated numbness/tingling. As a result of Melander's impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

160. Plaintiff Charles “Chuck” Mercein (“Mercein”) is 68 years old and resides with his wife, Plaintiff Jody Mercein, in White Plains, New York. He was an NFL running back who played for the New York Giants (1965-67), the Green Bay Packers (1967-69), and the New York Jets (1970). He was a member of the Packers Super Bowl II Championship team and helped build the mystique of Lambeau Field in the 1967 NFL Championship game between the Packers and the Dallas Cowboys that will forever be known as the “Ice Bowl.” Mercein suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Mercein has experienced cognitive difficulties including, but not limited to, headaches, dizziness, loss of memory, impulse control problems, depression, fatigue, sleep problems, and irritability. As a result of Mercein’s impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

161. Plaintiff Michael Merriweather (“Merriweather”) is 50 years old and resides with his wife, Plaintiff Sandra Merriweather, in Stockton, California. He was an NFL linebacker for the Pittsburgh Steelers (1982-87), the Minnesota Vikings (1989-92), the New York Jets (1993), and the Green Bay Packers (1993). He is a three-time Pro Bowl selection (1984-86), and a three-time All-Pro Selection (1984-85, 1987). Merriweather suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Merriweather has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, depression, fatigue, sleep problems, irritability, neck and cervical arthritis and associated numbness/tingling. As a result of Merriweather’s impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

162. Plaintiff Caleb Miller (“Miller”) is 31 years old and resides with his wife, Plaintiff Britney Miller, in Florence, Kentucky. He was an NFL middle linebacker who played for the Cincinnati Bengals (2004-07). Miller suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Miller has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, impulse control problems, depression, suicidal thoughts fatigue, sleep problems, irritability, numbness and tingling in his neck. As a result of Miller’s impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

163. Plaintiff Cleophus “Cleo” Miller (“C. Miller”) is 59 years old and resides with his wife, Plaintiff Stacy Miller, in Maple Heights, Ohio. He was an NFL running back who played for the Kansas City Chiefs (1974-75), and the Cleveland Browns (1975-82). C. Miller suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, C. Miller has experienced cognitive difficulties. As a result of C. Miller’s impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

164. Plaintiff Kory Minor (“Minor”) is 34 years old and resides with his wife, Plaintiff Lisa Rodriguez-Minor, in Moreno Valley, California. He was an NFL linebacker who played for the Carolina Panthers (1999-2002). Minor suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Minor has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, depression, fatigue, sleep problems, irritability, and numbness/tingling in his neck and cervical spine. As a result of Minor’s impairments, his wife

has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

165. Plaintiff Aaron Mitchell (“Mitchell”) is 55 years old and resides in Dallas, Texas. He was an NFL defensive back for the Dallas Cowboys (1979-80) and the Tampa Bay Buccaneers (1981). Mitchell suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Mitchell has experienced cognitive and other difficulties, including but not limited to, headaches, Loss of Memory, depression, sleep problems, irritability, and neck/cervical spine arthritis and associated numbness/tingling.

166. Plaintiff Derland Moore (“Moore”) is 60 years old and resides with his wife, Plaintiff Francis Moore, in Mandeville, Louisiana. He was an NFL defensive tackle for the New Orleans Saints (1973-1985) and the New York Jets (1986). He was selected to play in the 1983 Pro Bowl, set a Saints team record for service with 169 games played, and is a member of the New Orleans Saints Hall of Fame. Moore suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Moore has experienced cognitive difficulties. As a result of Moore’s impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

167. Plaintiff Michael Morton (“Morton”) is 51 years old and resides with his wife, Plaintiff Ellen Morton, in Wesley Chapel, Florida. He was an NFL running back who played for the Tampa Bay Buccaneers (1982-84), the Washington Redskins (1985), and the Seattle Seahawks (1987). Morton suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Morton has

experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, fatigue, irritability, and numbness/tingling in his neck and cervical spine. As a result of Morton's impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

168. Plaintiff Charles Myrtle ("Myrtle") is 66 years old and resides in Bethesda, Maryland. He was an NFL running back who played for the Denver Broncos (1967-72) and the San Diego Chargers (1974). Myrtle suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Myrtle has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, neurological disorder, depression, irritability, double vision, neck and cervical arthritis and associated numbness/tingling.

169. Plaintiff Mark Nichols ("Nichols") is 52 years old and resides with his wife, Plaintiff Terris Nichols, in Bakersfield, California. He was an NFL wide receiver who played for the Detroit Lions (1981-89). Nichols suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Nichols has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, dementia, impulse control problems, Alzheimer's, depression, fatigue, sleep problems, irritability, neck and cervical spine arthritis and associated numbness/tingling. As a result of Nichols's impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

170. Plaintiff Tommy Nobis ("Nobis") is 68 years old and resides with his wife, Plaintiff Carolyn Nobis, in Atlanta, Georgia. He was an NFL linebacker who played for the Atlanta Falcons (1966-76). He was the first ever player drafted by the expansion Falcons in

1966 and was voted NFL Defensive Rookie of the Year. He was a five-time Pro Bowl selection (1966-70, 1972), was selected All-Pro (1967), and was voted to the NFL's 1960s All-Decade Team. Nobis suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Nobis has experienced cognitive and other difficulties including, but not limited to, headaches, loss of memory, dementia, depression, fatigue, sleep problems, numbness/tingling in his neck and cervical spine. As a result of Nobis's impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

171. Plaintiff Keith Nord ("Nord") is 54 years old and resides with his wife, Plaintiff Jennifer Nord, in Wayzata, Minnesota. He was an NFL defensive back who played for the Minnesota Vikings (1979-85). Nord suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Nord has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, depression, fatigue, sleep problems, irritability, neck and cervical arthritis and associated numbness/tingling. As a result of Nord's impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

172. Plaintiff Joe Norman ("Norman") is 55 years old and resides with his wife, Plaintiff Sallie Norman, in Wooster, Ohio. He was an NFL linebacker who played for the Seattle Seahawks (1979-83). Norman suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Norman has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, fatigue, sleep problems, irritability, neck and cervical arthritis and associated

numbness/tingling. As a result of Norman's impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

173. Plaintiff August "Gus" Otto ("Otto") is 68 years old and resides with his wife, Plaintiff Mary Otto, in Chesterfield, Missouri. He was an NFL linebacker who played for the Oakland Raiders (1965-72). Otto was a member of the Raiders' first Super Bowl team (Super Bowl II), which lost to the Green Bay Packers. Otto suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Otto has experienced cognitive difficulties including, but not limited to, headaches, dizziness, and loss of memory. As a result of Otto's impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

174. Plaintiff R.C. Owens ("Owens") is 78 years old and resides with his wife, Plaintiff Susan Owens, in Manteca, California. He was an NFL wide receiver who played for the San Francisco 49ers (1957-61), the Baltimore Colts (1962-63), and the New York Giants (1964). Owens suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Owens has experienced cognitive and other difficulties including, but not limited to, headaches, loss of memory, chronic brain injury, dementia, impulse control problems, Alzheimer's, neurological disorder, depression, fatigue, sleep problems, neck and cervical arthritis and associated numbness/tingling. As a result of Owens's impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

175. Plaintiff Terry Owens ("T. Owens") is 67 years old and resides with his wife, Plaintiff Alison Owens, in Decatur, Alabama. He was an NFL offensive tackle who played for the San Diego Chargers (1966-75). T. Owens suffered repeated and chronic head impacts

during his career in the NFL and is at an increased risk of latent brain disease. As a result, T. Owens has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, dementia, impulse control problems, depression, suicidal thoughts, fatigue, sleep problems, peripheral neuropathy, neck and cervical arthritis and associated numbness/tingling. As a result of T. Owens's impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

176. Plaintiff Gary Padjen ("Padjen") is 53 years old and resides with his wife, Plaintiff Sonia Padjen, in Carmel, Indiana. He was an NFL linebacker who played for the Baltimore/Indianapolis Colts (1982-87). Padjen suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Padjen has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, impulse control problems, depression, suicidal thoughts, fatigue, sleep problems, irritability, neck and cervical spine arthritis and associated numbness/tingling. As a result of Padjen's impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

177. Plaintiff Donald Parrish ("Parrish") is 56 years old and resides with his wife, Plaintiff Lynette Parrish, in Tallahassee, Florida. He was an NFL defensive lineman who played for the Atlanta Falcons (1977) and the Kansas City Chiefs (1978-82). Parrish suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Parrish has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, depression, fatigue, sleep problems, irritability, neck and cervical spine arthritis and associated numbness/tingling. As a

result of Parrish's impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

178. Plaintiff Kurt Petersen ("Petersen") is 54 years old and resides with his wife, Plaintiff Karen Petersen, in Plano, Texas. He was an NFL offensive guard who played for the Dallas Cowboys (1980-85). Petersen suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Petersen has experienced cognitive and other difficulties including, but not limited to, dizziness, loss of memory, depression, sleep problems, irritability, and neck/cervical spine numbness and tingling. As a result of Petersen's impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

179. Plaintiff Warren Powers ("Powers") is 71 years old and resides with his wife, Plaintiff Linda Powers, in Chesterfield, Missouri. He was an NFL defensive back who played for the Oakland Raiders (1963-68). He was a member of the 1967 AFL Champion Oakland Raiders. Powers suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Powers has experienced cognitive difficulties including, but not limited to, loss of memory, dementia, and early stages of Alzheimer's. As a result of Powers' impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

180. Plaintiff Anthony Prior ("Prior") is 41 years old and resides in Forney, Texas. He was an NFL defensive back who played for the New York Jets (1993-95), the Minnesota Vikings (1996-97), and the Oakland Raiders (1998). Prior suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Prior has experienced cognitive and other difficulties including, but not

limited to, headaches, dizziness, loss of memory, dementia, impulse control problems, depression, suicidal thoughts, fatigue, sleep problems, irritability, and neck/cervical spine arthritis and associated numbness/tingling.

181. Plaintiff Randy Ragon (“Ragon”) resides in Lahaina, Hawaii. He was an NFL wide receiver who played for the Buffalo Bills (1978). Ragon suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Ragon has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, depression, suicidal thoughts, fatigue, irritability, neck and cervical spine arthritis and associated numbness/tingling.

182. Plaintiff David Recher (“Recher”) is 68 years old and resides with his wife, Plaintiff Camille Recher, in Gilbert, Arizona. He was an NFL center who played for the Philadelphia Eagles (1965-68). Recher suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Recher has experienced cognitive difficulties. As a result of Recher’s impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

183. Plaintiff Rudy Redmond (“Redmond”) is 64 years old and resides with his wife, Plaintiff Christine Redmond, in Southfield, Michigan. He was an NFL defensive back who played for the Atlanta Falcons (1969-71) and the Detroit Lions (1972). Redmond suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Redmond has experienced cognitive difficulties. As a result of Redmond’s impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

184. Plaintiff Clarence Reece (“Reece”) is 55 years old and resides with his wife, Plaintiff Linda Reece, in Bellevue, Washington. He was an NFL wide receiver who played for the Houston Oilers (1975). Reece suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Reece has experienced cognitive and other difficulties, including but not limited to, headaches, dizziness, loss of memory, dementia, impulse control problems, depression, fatigue, sleep problems, irritability, and neck/cervical spine arthritis and associated numbness and tingling. As a result of Reece’s impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

185. Plaintiff Walter Roberts (“Roberts”) is 70 years old and resides in San Jose, California. He was an NFL wide receiver who played for the Cleveland Browns (1964-66), the New Orleans Saints (1967), the Washington Redskins (1969-70), and the Denver Broncos (1971). He was a member of the 1964 NFL Champion Cleveland Browns. Roberts suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Roberts has experienced cognitive and other difficulties, including but not limited to, dizziness, sleep problems, and neck/cervical spine arthritis and associated numbness and tingling.

186. Plaintiff Jerry Robinson (“Robinson”) is 54 years old and resides in Santa Rosa, California. He was an NFL linebacker who played for the Philadelphia Eagles (1979-84) and the Los Angeles Raiders (1985-92). In 1981 he was selected to the Pro Bowl, and was voted All-Pro. He was also a member of the Eagles Super Bowl XV team. Robinson suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Robinson has experienced cognitive and other difficulties including, but not

limited to, headaches, dizziness, loss of memory, neurological disorder, depression, suicidal thoughts, fatigue, sleep problems, irritability, and numbness/tingling in his neck and spine.

187. Plaintiff Mark Robinson (“M. Robinson”) is 49 years old and resides with his wife, Plaintiff Melinda Robinson, in Palm Harbor, Florida. He was an NFL defensive back who played for the Kansas City Chiefs (1984-87) and the Tampa Bay Buccaneers (1988-1992). M. Robinson suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, M. Robinson has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, fatigue, sleep problems, irritability, and neck/cervical spine arthritis and associated numbness/tingling. As a result of M. Robinson’s impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

188. Plaintiff Rodrick Del Rodgers (“Rodgers”) is 51 years old and resides with his wife, Plaintiff Karen Rodgers, in Elk Grove, California. He was an NFL running back who played for the Green Bay Packers (1982-85) and the San Francisco 49ers (1987-88). He was a member of the Super Bowl Champion 49ers in Super Bowl XXIII. Rodgers suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Rodgers has experienced cognitive difficulties. As a result of Rodgers’ impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

189. Plaintiff Robin “Rob” Rubick (“Rubick”) is 51 years old and resides with his wife, Plaintiff Deborah Rubick, in Lapeer, Michigan. He was an NFL tight end who played for the Detroit Lions (1982-1989). Rubick suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Rubick has

experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, fatigue, sleep problems, irritability, and neck/cervical spine arthritis. As a result of Rubick's impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

190. Plaintiff Frank Ryan ("Ryan") is 75 years old and resides with his wife, Plaintiff Joan Ryan, in Grafton, Vermont. He was an NFL quarterback who played for the Los Angeles Rams (1958-61), the Cleveland Browns (1962-68), and the Washington Redskins (1969-70). He was a three-time Pro Bowl selection (1964-66), and was a member of the 1964 NFL Champion Cleveland Browns. Ryan suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Ryan has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, fatigue, sleep problems, irritability, and neck and cervical spine arthritis and associated numbness/tingling. As a result of Ryan's impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

191. Plaintiff Steven Schubert ("Schubert") is 60 years old and resides with his wife, Plaintiff Sandra Schubert, in Candia, New Hampshire. He was an NFL wide receiver who played for the New England Patriots (1974) and the Chicago Bears (1975-79). Schubert suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Schubert has experienced cognitive and other difficulties including, but not limited to, loss of memory, sleep problems, and neck and cervical spine numbness/tingling. As a result of Schubert's impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

192. Plaintiff William “Billy” Shields (“Shields”) is 58 years old and resides with his wife, Plaintiff Laurel Shields, in Poway, California. He was an NFL offensive tackle who played for the San Diego Chargers (1975-83), San Francisco 49ers (1984), and the New York Jets (1985). Shields suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Shields has experienced cognitive difficulties. As a result of Shields’ impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

193. Plaintiff Edward Simonini (“Simonini”) is 58 years old and resides with his wife, Plaintiff Karen Simonini, in Tulsa, Oklahoma. He was an NFL linebacker who played for the Baltimore Colts (1976-81), the New Orleans Saints (1982), and the Miami Dolphins (1983). Simonini suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Simonini has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, depression, suicidal thoughts, sleep problems, irritability, and neck and cervical spine arthritis and associated numbness/tingling. As a result of Simonini’s impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

194. Plaintiff Keith Sims (“Sims”) is 44 years old and resides with his wife, Plaintiff Tia Sims, in Davie, Florida. He was an NFL offensive guard who played for the Miami Dolphins (1990-97) and the Washington Redskins (1998-2000). He was a three-time Pro Bowl selection (1993-95). Sims suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Sims has experienced cognitive and other difficulties including, but not limited to, headaches, sleep problems, and neck and cervical spine numbness/tingling. As a result of Sims’s impairments, his wife has been

deprived of marital services including, but not limited to, loss of companionship, affection, and support.

195. Plaintiff Fred Smerlas (“Smerlas”) is 54 years old and resides with his wife, Plaintiff Kristine Smerlas, in Sudbury, Massachusetts. He was an NFL nose tackle who played for the Buffalo Bills (1979-89), the San Francisco 49ers (1990), and the New England Patriots (1991-1992). Smerlas was a five-time Pro Bowl selection (1980-83 and 1988). Smerlas suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Smerlas has experienced cognitive difficulties. As a result of Smerlas’s impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

196. Plaintiff Charlie Smith (“Smith”) is 65 years old and resides in Oakland, California. He was an NFL running back who played for the Oakland Raiders (1968-74) and the San Diego Chargers (1974-75). Smith was a member of the Raiders’ first Super Bowl team (Super Bowl II) which lost to the Green Bay Packers. Smith suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Smith has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, depression, fatigue, sleep problems, and neck and cervical spine numbness/tingling.

197. Plaintiff Michael Sommer (“Sommer”) is 77 years old and resides with his wife, Plaintiff Barbara Sommer, in Dunedin, Florida. He was an NFL running back who played for the Washington Redskins (1958, 61), the Baltimore Colts (1959-61), and the Oakland Raiders (1963). Sommer suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Sommer has experienced cognitive

difficulties including, but not limited to, dizziness, loss of memory, impulse control problems, depression, sleep problems, and irritability. As a result of Sommer's impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

198. Plaintiff Arthur Still ("Still") is 56 years old and resides with his wife, Plaintiff Lizbeth Still, in Liberty, Missouri. He was an NFL defensive end who played for the Kansas City Chiefs (1978-87) and the Buffalo Bills (1988-89). Still suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Still has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, impulse control problems, depression, suicidal thoughts, fatigue, sleep problems, irritability, and neck and cervical spine arthritis. As a result of Still's impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

199. Plaintiff Bryan Stoltenberg ("Stoltenberg") is 39 years old and resides with his wife, Plaintiff Laura Stoltenberg, in Sugar Land, Texas. He was an NFL center and offensive guard who played for the San Diego Chargers (1996), the New York Giants (1997) and the Carolina Panthers (1998-2000). Stoltenberg suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Stoltenberg has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, depression, fatigue, sleep problems, irritability, and numbness and tingling in his neck and cervical spine. As a result of Stoltenberg's impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

200. Plaintiff Daniel Sullivan (“Sullivan”) is 72 years old and resides with his wife, Plaintiff Lorraine Sullivan, in Andover, Massachusetts. He was an NFL offensive lineman who played for the Baltimore Colts (1962-72). He played in two Super Bowls for the Baltimore Colts (Super Bowl III and V), winning one Championship. Sullivan suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Sullivan has experienced cognitive difficulties. As a result of Sullivan’s impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

201. Plaintiff Wille Taylor (“Taylor”) is 56 years old and resides in Lemoyne, Pennsylvania. He was an NFL wide receiver who played for the Tampa Bay Buccaneers (1978), the Green Bay Packers (1978), the Philadelphia Eagles (1979), and the Pittsburgh Steelers (1980). Taylor suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Taylor has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, impulse control problems, depression, fatigue, sleep problems, irritability, and neck/cervical spine arthritis and associated numbness/tingling.

202. Plaintiff Charles Thomas (“Thomas”) is 51 years old and resides in Las Vegas, Nevada. He was an NFL offensive lineman who played for the Atlanta Falcons (1985-86), the San Francisco 49ers (1987-92), and the Detroit Lions (1992). He was a member of two 49er Super Bowl Championship teams (Super Bowls XXIII and XXIV). Thomas suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Thomas has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, dementia, impulse control

problems, depression, suicidal thoughts, fatigue, sleep problems, irritability, and neck/cervical spine arthritis and associated numbness/tingling.

203. Plaintiff Steve Thurlow (“Thurlow”) is 69 years old and resides with his wife, Plaintiff Chris Ann Thurlow, in Old Greenwich, Connecticut. He was an NFL running back who played for the New York Giants (1964-66) and the Washington Redskins (1966-68). Thurlow suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Thurlow has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, fatigue, sleep problems, and neck/cervical spine arthritis and associated numbness/tingling. As a result of Thurlow’s impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

204. Plaintiff Love James Tolbert (“Tolbert”) is 67 years old and resides with his wife, Plaintiff Beverley Tolbert, in San Diego, California. He was an NFL defensive back who played for the San Diego Chargers (1966-71, 1976), the Houston Oilers (1972), and the St. Louis Cardinals (1973-75). Tolbert suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Tolbert has experienced cognitive difficulties. As a result of Tolbert’s impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

205. Plaintiff William Truax (“Truax”) is 68 years old and resides in Gulfport, Mississippi. He was an NFL tight end who played for the Los Angeles Rams (1964-70) and the Dallas Cowboys (1971-73). Truax suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Truax has experienced

cognitive and other difficulties including, but not limited to, headaches, dizziness, and neck and cervical spine arthritis and associated numbness/tingling.

206. Plaintiff Clarence Verdin (“Verdin”) is 48 years old and resides with his wife, Plaintiff Carolyn Verdin, in New Orleans, Louisiana. He was an NFL wide receiver who played for the Washington Redskins (1986-87), the Indianapolis Colts (1988-93), and the Atlanta Falcons (1994). Verdin was a two-time Pro Bowl selection (1990, 1992), and was a member of the Redskins’ Super Bowl XXII Championship team. Verdin suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Verdin has experienced cognitive difficulties. As a result of Verdin’s impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

207. Plaintiff Phil Villapiano (“Villapiano”) is 62 years old and resides with his wife, Plaintiff Susan Villapiano, in Greenwich, Connecticut. He was an NFL linebacker who played for the Oakland Raiders (1971-79) and the Buffalo Bills (1980-83). He was a four-time Pro Bowl selection (1973-76), and a Super Bowl Champion with Raiders in Super Bowl XI. Villapiano suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Villapiano has experienced cognitive and other difficulties including, but not limited to, loss of memory, sleep problems, irritability, and numbness/tingling in his neck and cervical spine. As a result of Villapiano’s impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

208. Plaintiff Dave Washington, Jr. (“Washington”) is 63 years old and resides with his wife, Plaintiff Dianne Washington, in Madison, Mississippi. He was an NFL outside

linebacker for the Denver Broncos (1970-71), the Buffalo Bills (1972-74), the San Francisco 49ers (1975-77), the Detroit Lions (1978-79), and the New Orleans Saints (1980). He was selected to one Pro Bowl in 1976. Washington suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Washington has experienced cognitive and other difficulties including, but not limited to, loss of memory, impulse control problems, fatigue, sleep problems, irritability, neck and cervical arthritis and associated numbness/tingling. As a result of Washington's impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

209. Plaintiff Joe Washington ("J. Washington") is 58 years old and resides with his wife, Plaintiff Meadow Washington, in Lutherville, Maryland. He was an NFL running back for the San Diego Chargers (1976-77), the Baltimore Colts (1978-80), the Washington Redskins (1981-84), and the Atlanta Falcons (1985). He was selected to one Pro Bowl in 1979, and was a member of two Super Bowl teams (Super Bowls XVII and XVIII), winning a Super Bowl Championship with the Redskins in Super Bowl XVII. He is also a member of the Redskins "70 Greatest Redskins" list. J. Washington suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, J. Washington has experienced cognitive and other difficulties including, but not limited to, headaches, loss of memory, depression, sleep problems, irritability, and neck/cervical spine arthritis. As a result of J. Washington's impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

210. Plaintiff Larry Webster ("Webster") is 42 years old and resides in Baltimore, Maryland. He was an NFL defensive tackle who played for the Miami Dolphins

(1992-94), the Cleveland Browns (1995), the Baltimore Ravens (1996-2001), and the New York Jets (2002). Webster was a member of the Ravens' Super Bowl XXXV Championship team. Webster suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Webster has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, depression, fatigue, sleep problems, irritability, and neck and cervical spine arthritis and associated numbness/tingling.

211. Plaintiff Michael Weddington ("Weddington") is 51 years old and resides with his wife, Plaintiff Jacqueline Weddington, in Simi Valley, California. He was an NFL linebacker who played for the Green Bay Packers (1986-90). Weddington suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Weddington has experienced cognitive and other difficulties including, but not limited to, sleep problems, irritability, neck and cervical spine arthritis and associated numbness/tingling. As a result of Weddington's impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

212. Plaintiff Edward White ("White") is 64 years old and resides with his wife, Plaintiff Joan White, in Julian, California. He was an NFL offensive guard for the Minnesota Vikings (1969-77) and the San Diego Chargers (1978-85). White was a four-time Pro Bowl selection (1975-77 and 1979), and is one of only 10 players to have played in all four Vikings' Super Bowl appearances. When he retired, no professional football player had played in more games as an offensive lineman (241 games played). White suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, White has experienced cognitive difficulties. As a result of White's impairments, his wife

has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

213. Plaintiff James Williams (“Williams”) is 43 years old and resides in Duluth, Georgia. He was an NFL linebacker who played for the New Orleans Saints (1990-94), the Jacksonville Jaguars (1995-96), the Atlanta Falcons (1996-97), the San Francisco 49ers (1997-98), and the Cleveland Browns (1999). Williams was selected by the Jacksonville Jaguars in the 1995 Expansion Draft. Williams suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Williams has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, dementia, impulse control problems, neurological disorder, depression, suicidal thoughts, sleep problems, irritability, neck and cervical arthritis and associated numbness/tingling.

214. Plaintiff John Williams (“J. Williams”) is 47 years old and resides with his wife, Plaintiff Sharon Williams, in Palatka, Florida. He was an NFL fullback who played for the Seattle Seahawks (1986-93) and the Pittsburgh Steelers (1994-95). He was a two-time Pro Bowl selection (1990-91), and was a member of the Steelers Super Bowl XXX team. J. Williams suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, J. Williams has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, impulse control problems, depression, suicidal thoughts, fatigue, sleep problems, irritability, neck and cervical arthritis and associated numbness/tingling. As a result of J. Williams’ impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

215. Plaintiff Jerry Wilson (“Wilson”) is 38 years old and resides in Houston, Texas. He was an NFL defensive back who played for the Tampa Bay Buccaneers (1995), the Miami Dolphins (1996-00), the New Orleans Saints (2001-02), and the San Diego Chargers (2002-05). Wilson suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Wilson has experienced cognitive difficulties including, but not limited to, headaches, dizziness, and loss of memory.

216. Plaintiff Mike Wood (“Wood”) is 57 years old and resides in Missouri. He was an NFL kicker who played for the Minnesota Vikings (1978), the St. Louis Cardinals (1978-80), and the Baltimore Colts (1981-82). Wood suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Wood has experienced cognitive difficulties.

217. Plaintiff Larry Woods (“Woods”) is 63 years old and resides with his wife, Plaintiff Rose Marie Woods, in Houston, Texas. He was an NFL defensive tackle who played for the Detroit Lions (1971-72), the Miami Dolphins (1973), the New York Jets (1974-75), and the Seattle Seahawks (1976). Woods suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Woods has experienced cognitive difficulties. As a result of Woods’s impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

218. Plaintiff Marvin Woodson (“Woodson”) is 70 years old and resides with his wife, Plaintiff Selitta Woodson, in Dallas, Texas. He was an NFL defensive back who played for the Pittsburgh Steelers (1964-69) and the New Orleans Saints (1969). Woodson suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of

latent brain disease. As a result, Woodson has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, impulse control problems, depression, suicidal thoughts, sleep problems, irritability, and numbness/tingling in his neck and cervical spine. As a result of Woodson's impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

219. Plaintiff Frank Youso ("Youso") is 75 years old and resides with his wife, Plaintiff Evelyn Youso, in International Falls, Minnesota. He was an NFL offensive tackle who played for the New York Giants (1958-60), the Minnesota Vikings (1961-62), and the Oakland Raiders (1963-65). He was a member of the Giants team that played in the 1958 NFL Championship game against the Baltimore Colts, referred to by football historians as "The Greatest Game Ever Played." Youso suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Youso has experienced cognitive and other difficulties including, but not limited to, headaches, dizziness, loss of memory, dementia, depression, fatigue, sleep problems, irritability, and neck and cervical spine arthritis and associated numbness/tingling. As a result of Youso's impairments, his wife has been deprived of marital services including, but not limited to, loss of companionship, affection, and support.

220. Defendant NFL, which maintains its offices at 280 Park Avenue, New York, New York, is an unincorporated association consisting of the 32 separately-owned and independently-operated professional football teams that are listed below. The NFL is engaged in interstate commerce in the business of, among other things, operating the sole major professional football league in the United States. The NFL is not, and has not, been the employer of the Plaintiffs, all of whom were employed during their respective careers in professional football by

the clubs indicated above. The United States Supreme Court held last year in *American Needle, Inc. v. NFL*, 130 S.Ct. 2201, 2212-13 (2010) that each team that is a member of the NFL association is a legally distinct and separate entity from both other teams and the League itself:

The NFL teams do not possess either the unitary decisionmaking quality or the single aggregation of economic power characteristic of independent action. Each of the teams is a substantial, independently owned, and independently managed business. “[T]heir general corporate actions are guided or determined” by “separate corporate consciousnesses,” and “[t]heir objectives are” not “common.” The teams compete with one another, not only on the playing field, but to attract fans, for gate receipts and for contracts with managerial and playing personnel.

221. The 32 separately-owned and independently-operated professional football teams mentioned above are:

NFL Team Owner	State of Organization	Team Name (City)
Arizona Cardinals, Inc.	Arizona	Arizona Cardinals
Atlanta Falcons Football Club LLC	Georgia	Atlanta Falcons
Baltimore Ravens Limited Partnership	Maryland	Baltimore Ravens
Buffalo Bills, Inc.	New York	Buffalo Bills
Panthers Football LLC	North Carolina	Carolina Panthers
Chicago Bears Football Club, Inc.	Delaware	Chicago Bears
Cincinnati Bengals, Inc.	Ohio	Cincinnati Bengals
Cleveland Browns LLC	Delaware	Cleveland Browns
Dallas Cowboys Football Club, Ltd.	Texas	Dallas Cowboys
Denver Broncos Football Club	Colorado	Denver Broncos
Detroit Lions, Inc.	Michigan	Detroit Lions

Green Bay Packers, Inc.	Wisconsin	Green Bay Packers
Houston NFL Holdings LP	Delaware	Houston Texans
Indianapolis Colts, Inc.	Delaware	Indianapolis Colts
Jacksonville Jaguars Ltd.	Florida	Jacksonville Jaguars
Kansas City Chiefs Football Club, Inc.	Texas	Kansas City Chiefs
Miami Dolphins, Ltd.	Florida	Miami Dolphins
Minnesota Vikings Football Club LLC	Minnesota	Minnesota Vikings
New England Patriots, LP	Delaware	New England Patriots
New Orleans Louisiana Saints LLC	Texas	New Orleans Saints
New York Football Giants, Inc.	New York	New York Giants
New York Jets Football Club, Inc.	Delaware	New York Jets
Oakland Raiders LP	California	Oakland Raiders
Philadelphia Eagles Football Club, Inc.	Delaware	Philadelphia Eagles
Pittsburgh Steelers Sports, Inc.	Pennsylvania	Pittsburgh Steelers
San Diego Chargers Football Co.	California	San Diego Chargers
San Francisco Forty Niners Ltd.	California	San Francisco 49ers
Football Northwest LLC	Washington	Seattle Seahawks
The Rams Football Company LLC	Delaware	St. Louis Rams
Buccaneers Limited Partnership	Delaware	Tampa Bay Buccaneers
Tennessee Football, Inc.	Delaware	Tennessee Titans
Washington Football Inc.	Maryland	Washington Redskins

222. Defendant NFL Properties, LLC as the successor-in-interest to National

Football League Properties Inc. ("NFL Properties") is a limited liability company organized and

existing under the laws of the State of Delaware with its headquarters in the State of New York. NFL Properties is engaged in, among other activities, approving, licensing and promoting equipment used by all the NFL teams. NFL Properties regularly conducts business in Pennsylvania.

223. Defendants National Football League and NFL Properties shall be referred to collectively herein as the “NFL” or “League.”

224. The NFL caused or contributed to the injuries alleged herein through its voluntary undertaking including its acts and omissions in misrepresenting the true risks of repeated traumatic brain and head impacts in NFL football, and failing to take appropriate steps to prevent and mitigate repeated traumatic brain and head impacts in the NFL and the latent neurodegenerative disorders and diseases caused by these impacts.

MASS ACTION AND JOINDER ALLEGATIONS

225. Joinder is permissible pursuant to Fed. R. Civ. P. 20(a) in that the claims alleged herein arise out of the same series of occurrences, and questions of law or fact common to all Plaintiffs arise in this action.

226. Common questions of law and fact will arise in this action, including but not limited to:

- a. Whether the NFL, through its own voluntary undertaking, was negligent in its response to the health effects of repeated head impacts and the injuries consequently suffered by the Plaintiffs;
- b. Whether § 301 of the Labor Relations Management Act preempts Plaintiffs’ tort law claims pled herein;

- c. Whether the NFL committed negligence and/or fraud in misrepresenting the risks of repeated head impacts in NFL play to the Plaintiffs; and
- d. Whether repeated head impacts during play in the NFL cause latent neurodegenerative brain disorders and disease.

NATURE OF THE NFL'S BUSINESS

227. The primary business in which the NFL and its member clubs are engaged is the operation of major league professional football teams and the sale of tickets and telecast rights to the public for the exhibition of the individual and collective football talents of players such as Plaintiffs.

228. The NFL's transactions involve collective annual expenditures and receipts in excess of \$9.3 billion. But, as Dan Greeley, CEO of Network Insights, has noted:

The NFL is like Procter & Gamble. There's the holding company, the core operation, but then each brand has its own team and world of revenue. Like Tide: That's a P&G product but within that there are different types of Tide and a number of people that make money from it. So the \$9.3 billion pie just scratches the surface and doesn't get into how much is spent around stadiums, merchandise, agents, all the way down to mom-and-pop shops.

229. Annually, the NFL redistributes upwards of \$4 billion in radio, television and digital earnings to the clubs that are part of the NFL association —\$125 million apiece, plus an equal share for the league—and that number shows no sign of declining. The 19 highest-rated fall television programs (and 28 of the top 30) were NFL games, and this year's Super Bowl was the most-watched program ever. The NFL earns enormous amounts annually from its telecasting

deals with, *inter alia*, ESPN (\$1.1 billion), DirecTV (\$1 billion), NBC (\$650 million), Fox (\$712.5 million), and CBS (\$622.5 million).

230. Companies pour money into the League's coffers for the right to associate their brands with the NFL. Among those making such contributions are Pepsi (\$560 million over eight years, starting in 2004) and Gatorade (\$45 million a year, plus marketing costs and free Gatorade for teams). Verizon is paying \$720 million over four years to be the League's wireless service provider. Nike paid \$1.1 billion to acquire the NFL's apparel sponsorship. Previous partner Reebok had been selling \$350 million annually in NFL-themed gear. The League has a \$1.2 billion, six-year deal with beer sponsor Anheuser-Busch, but teams still cut their own deals when it comes to pouring rights at stadiums. On September 7, 2011, it was announced that the NFL signed a new 10-year \$2.3 billion deal with Pepsi, which is one of the largest sponsorship deals in sports history. It encompasses a number of Pepsi brands (Pepsi, Frito-Lay, Tropicana, Quaker Oats and Gatorade). This deal, combined with a number of other new sponsorships, ticket sales projections & TV ratings, means that the NFL is projecting record revenues of over \$9.5 billion this season.

231. Teams can collect \$25-\$30 million for stadium naming rights, usually on 10-year deals. The largest is Reliant Energy's \$10 million per year contract with the Houston Texans. In Los Angeles, Farmers Insurance has promised \$700 million over 30 years to name a stadium for a team that doesn't exist yet.

232. Many clubs that are part of the NFL association own in whole or in part the stadiums in which they play, which can be a source of major commercial value, as reflected in the following chart:

STADIUM, TEAM	OPENED	PRICE (2010 DOLLARS)	% PRIVATE
New Meadowlands, NY	2010	\$1.6B	100
Cowboys Stadium, DAL	2009	\$1.15B	56
Lucas Oil Field, IND	2008	\$780M	13
U. of Phoenix Stadium, ARI	2006	\$493M	32
Lincoln Financial, PHI	2003	\$588M	65
Ford Field, DET	2002	\$504M	49
Gillette Stadium, NE	2002	\$373M	100
Reliant Stadium, HOU	2002	\$526M	39
Qwest Field, SEA	2002	\$422M	29
Invesco Field, DEN	2001	\$683M	39
Heinz Field, PIT	2001	\$312M	16

233. In 2010, more than 17 million fans passed through turnstiles operated by clubs that are part of the NFL association, paying anywhere from \$54.51 (Cleveland Browns) to \$117.84 (New England Patriots) for the average game ticket. Though the league won't open its books, numbers for the publicly-held Green Bay Packers ("Packers") offer some insight into what teams reap at the ticket office and concession stands. In 2010, the Packers cleared \$60,059,646 from home and away game tickets plus private boxes. Projected over 32 teams, that is nearly \$2 billion annually. The Packers reaped \$13 million from concessions, parking and local media in 2010, which translates to \$416 million on a league-wide basis.

FACTUAL ALLEGATIONS

A. The Scientific Evidence On Concussions And Head Injuries And The NFL's Responses To It.

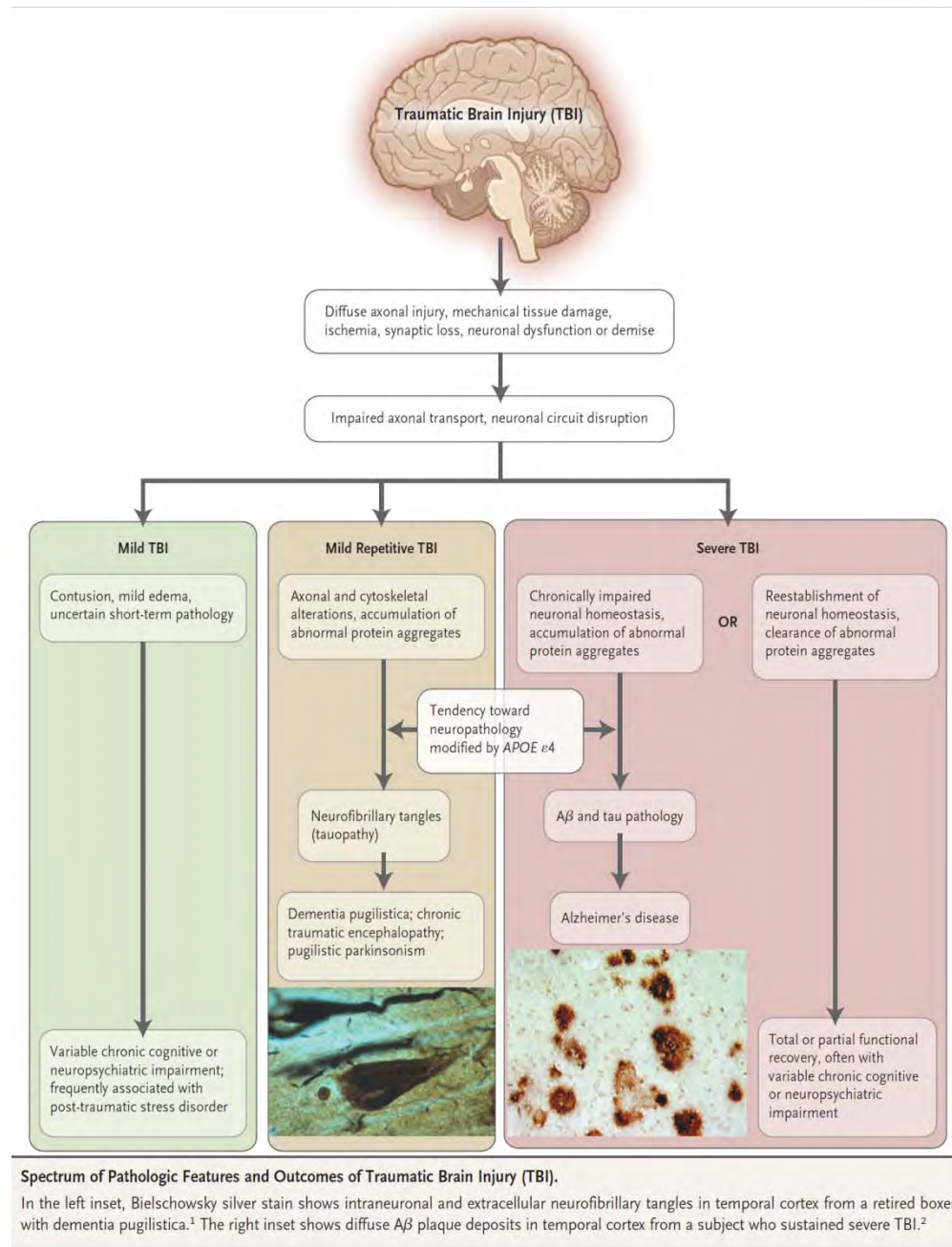
234. A 2011 article in the *Journal of Sports & Entertainment Law of Harvard*

Law School summed up the consequences of concussions to athletes (footnotes omitted):

From high school leagues to the NFL, football players are becoming bigger, faster, and stronger, thereby increasing the force of collisions that occur during a game and increasing the potential for serious injuries. The brain is a soft organ, surrounded by cerebrospinal fluid and protected by the tough, bony skull. Normally, the fluid around the brain serves as a protective cushion for the brain, isolating it from direct impact to the skull. When the head suffers violent impact, the brain can hit the skull, causing the brain temporarily to stop working normally. This is called a concussion.

More serious injuries occur after the initial concussion. A concussion causes brain cells to become depolarized and allows neurotransmitters to behave in an abnormal fashion, causing such symptoms as memory loss, nausea, and confusion. After the initial concussion, when the brain is not fully healed, it is very fragile and susceptible to minor accelerative forces. Thus, subsequent minor hits may cause traumatic and permanent brain injury. This is the heart of the problem: players returning to the football field before allowing their initial concussion to heal fully. When the player returns to the field too early, he is at risk for what is known as Second Impact Syndrome (SIS). SIS is the event that ensues when there is a subsequent brain impact before the initial concussion has been given time to heal. Additionally, when concussions occur with high frequency, a disease called Chronic Traumatic Encephalopathy (CTE) may occur in the brain. "CTE is a progressive neurodegenerative disease caused by repetitive trauma to the brain which eventually leads to dementia." While CTE was originally diagnosed most commonly in boxers, it is now regularly found in football players. **Of all sports related injuries, concussions are the injuries that most often go unnoticed and untreated, especially in football.** (Emphasis added).

235. The following chart, excerpted from a 2010 article in the *New England Journal of Medicine* entitled “Traumatic Brain Injury--Football, Warfare And Long-Term Effects” shows how even repetitive mild traumas can have lasting consequences:



236. The NFL’s responses to the issue of brain injuries caused to retired NFL players because of concussions or head impacts received during the period that they played

professional football has been, until very recently, one of deception and denial. The NFL and several of the scientists it employed actively tried to conceal the extent of the problem until recently. The response of the League once it acknowledged the issue has been inadequate.

237. The collective bargaining agreements (“CBAs”), negotiated between the League and the NFL Players’ Association, do not address or otherwise create obligations of the NFL to disclose the risks associated with, prevent, or treat concussions or brain injuries incurred by present or former NFL players. Nor did any CBA deal with the creation or operation of the Mild Traumatic Brain Injury Committee (“MTBI Committee”, sometimes also referred to in press reports as the “Concussion Committee”), which was created by the NFL’s own initiative and voluntary undertaking in 1994. The “experts” who functioned on the MTBI Committee operated independently of any CBA and were not a party to any CBA. To the extent that the NFL or its agents (including, but not limited to, the MTBI and its members) issued pronouncements, assurances or warnings about the dangers or risks of concussions, they have done so independently of any CBA.

238. The League’s disinformation campaign was spearheaded by its MTBI Committee, which was chaired from 1994 to February of 2007 by Dr. Elliott Pellman (“Pellman”), a rheumatologist who reportedly attended medical school in Guadalajara, Mexico. Dr. Pellman worked with two other scientists on the MTBI Committee—Dr. Ira Casson (“Casson”), a neurologist, and Dr. David Viano (“Viano”), a biomechanical engineer—to attempt to discredit a slew of scientific studies that linked head impacts and concussions received by NFL players to brain injuries. Casson and Viano replaced Pellman as co-chairs of the MTBI Committee in February 2007.

239. Since 1994, the MTBI Committee had been conducting a study to determine the effect of concussions on the long-term health of retired NFL players. In a November 2007 report to Congress, NFL Commissioner Roger Goodell (“Goodell”) said that the MTBI Committee’s study was in its “initial” data collection phase and that “[w]e do not know when this study will be completed, although it is likely that a comprehensive study will require at least several years of research and analysis.”

240. In October of 2006, Pellman and Viano published in *Neurological Focus* an interim report on the MTBI Committee’s efforts that surveyed 12 years of data collection. The authors analyzed collected "data on mild TBIs sustained between 1996 and 2001" and concluded that:

[B]ecause a significant percentage of players returned to play in the same game [as they suffered 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 TBIs in professional football are not serious injuries. (Emphasei added).

241. As explained further below, this conclusion was against the weight of the scientific evidence, a fact that the members of the MTBI Committee well knew; it was also based on biased data collection techniques. As ESPN reported in February of 2007:

Last fall, ESPN The Magazine reported that Pellman was selective in his use of injury reports in reaching his conclusions and omitted large numbers of players from the league's concussion study. His findings also contradicted other scientific studies into the effects of concussions:

• In January 2005, Pellman and his colleagues wrote that returning to play after a concussion "does not involve significant risk of a second injury either in the same game or during the season." But a 2003 NCAA

study of 2,905 college football players found just the opposite: Those who have suffered concussions are more susceptible to further head trauma for seven to 10 days after the injury.

• Pellman, a rheumatologist, and his group have **also stated repeatedly that their work shows "no evidence of worsening injury or chronic cumulative effects of multiple [mild traumatic brain injury] in NFL players."** But a 2003 report by the Center for the Study of Retired Athletes at the University of North Carolina found a link between multiple concussions and depression among former pro players with histories of concussions. And a 2005 follow-up study at the Center showed a connection between concussions and both brain impairment and Alzheimer's disease among retired NFL players. (Emphases added).

242. The concerns about head injuries associated with the playing of football—and the refusal to recognize those concerns by those in charge of the game—have a long history. On Monday, February 1st, 2010, Dr. Bennet Omalu (“Omalu”), Co-Director of the Brain Injury Institute at West Virginia University, spoke before members of the House Judiciary Committee at a forum in Houston, Texas with regard to “Head and Other Injuries in Youth, High School, College, and Professional Football.” In his prepared testimony, he explained:

Glenn Pop Warner [1871 – 1954] founded the Pop Warner youth football league in 1929. He still remains one of the greatest football coaches in the history of American football. The single event, which necessitated the use of pads and helmets by football players, took place in 1888 when the annual rules convention for the emerging sport of college football passed a rule permitting tackling below the waist.

“Football changed dramatically. Teams no longer arrayed themselves across the entire breadth of the field. Teams bunched themselves around the runner to block for him. The wedge and mass play arrived. Football became, for a

time, a savage sport full of fights, brawling, even fatalities.”

In 1912, Pop Warner said: “Playing without helmets gives players more confidence, saves their heads from many hard jolts, and keeps their ears from becoming torn or sore. I do not encourage their use. I have never seen an accident to the head which was serious, but I have many times seen cases when hard bumps on the head so dazed the player receiving them that he lost his memory for a time and had to be removed from the game.”

We have known about concussions and the effects of concussions in football for over a century. Every blow to the head is dangerous. Repeated concussions and sub-concussions both have the capacity to cause permanent brain damage. During practice and during games, a single player can sustain close to one thousand or more hits to the head in only one season without any documented or reported incapacitating concussion. Such repeated blows over several years, no doubt, can result in permanent impairment of brain functioning especially in a child. (Footnotes omitted; emphases added).

243. The scientific evidence on concussions and subsequent brain disease in boxing, football, and other sports has been mounting, but for a long period, the NFL attempted to deny, discredit, and ignore it.

244. The risk of repeated head impacts in certain sports and brain disease has been understood for decades. In 1928, a New Jersey pathologist, Harrison Martland, described the clinical spectrum of abnormalities found in “nearly one half of the fighters who stayed in the game long enough.” Follow-up studies on encephalopathy and repeated head impacts in sport were published in 1952. The risk of second impacts (Second Impact Syndrome) in sport was identified in 1973. It was also clear by the 1970’s that the patterns of neurodegeneration associated with head impacts in boxing also occurred in other sports.

245. From 1931 to 2006, the National Center for Catastrophic Sport Injury Research has reported 1,006 direct and 683 indirect fatalities resulting from participation in all organized football in the United States; the annual number of indirect fatalities has remained near 9.0 per year.

246. A 1994 Ball State University survey found that "players in the 1980s suffered serious injuries and underwent operations at twice the rate of those who played in the 1950s or earlier."

247. A study presented at the American Academy of Neurology's 52nd Annual Meeting in 2000 and authored principally by Dr. Barry Jordan, Director of the Brain Injury Program at Burke Rehabilitation Hospital in White Plains, New York, surveyed 1,094 former NFL players between the ages of 27 and 86 and found that: (a) more than 61% had suffered at least one concussion in their careers with 30% of the players having three or more and 15% having five or more; (b) 51% had been knocked unconscious more than once; (c) 73% of those injured said they were not required to sit on the sidelines after their head trauma; (d) 49% of the former players had numbness or tingling; 28% had neck or cervical spine arthritis; 31% had difficulty with memory; 16 % were unable to dress themselves; and 11% were unable to feed themselves; and (e) eight suffered from Alzheimer's disease.

248. A 2001 report by Dr. Frederick Mueller that was published in the Journal of Athlete Training reported that a football-related fatality has occurred every year from 1945 through 1999, except for 1990. Head-related deaths accounted for 69% of football fatalities, cervical spinal injuries for 16.3%, and other injuries for 14.7%.

249. A series of important studies emanated from the University of North Carolina ("UNC"), which were attacked by members of the NFL's MTBI Committee.

250. A 2000 UNC study found that in the period between 1977 and 1998, an annual average of 13 athletes had suffered catastrophic injuries (primarily permanent paralysis) as the direct result of participation in football. The study also found that between 1977 and 1998, 200 football players received a permanent cervical cord injury, and 66 sustained a permanent cerebral injury.” As reported in *Science Daily*:

The study, published in the September-October issue of the American Journal of Sports Medicine, suggests that the brain is more susceptible to injury when it has not had enough time to recover from a first injury. Researchers say the finding is important because concussions can lead to permanent brain damage, vision impairment or even death if not managed properly.

"We believe recurrences are more likely because injured players are returning to practice and to games too quickly after blows to the head," said Dr. Kevin M. Guskiewicz, assistant professor of exercise and sport science at UNC-CH and study leader. "Many clinicians are not following the medical guidelines that players should be symptom-free for several days before returning." (Emphases added).

251. A 2003 study partially authored by the aforementioned Dr. Kevin Guskiewicz (“Guskiewicz”) of UNC analyzed data from almost 2,500 retired NFL players and found that 263 of the retired players suffered from depression. The study found that having three or four concussions meant twice the risk of depression as never-concussed players and five or more concussions meant a nearly threefold risk.

252. In November of 2003, Guskiewicz was scheduled to appear on HBO's “Inside the NFL” to discuss his research. Pellman, who was also going to be on the show, called Guskiewicz. “I had never spoken with him before, and he attacked me from the get-go,” Guskiewicz said. “He questioned whether it was in my best interest to do the show. He was a

bull in a china shop.” **On the program, Pellman said unequivocally, “[w]hen I look at that study, I don’t believe it.”** (Emphasis added).

253. In 2005, Guskiewicz did a follow-up to his 2003 study and found that retired NFL players who sustained three or more concussions had a fivefold greater likelihood of suffering Mild Cognitive Impairment (“MCI”) than retired NFL players who had no history of concussions. Guskiewicz based his conclusions on a survey of over 2,550 former NFL players. **Dr. Mark Lovell (“Lovell”) of the NFL’s MTBI Committee asserted that Guskiewicz’s study lacked “scientific rigor” and that one couldn’t tell anything from a survey.**

254. **“Pellman’s committee has repeatedly questioned and disagreed with the findings of researchers who didn’t come from their own injury group,” said Julian Bailes, Chairman of Neurosurgery at West Virginia University.**

255. The MTBI Committee decided to respond to these types of studies by presenting biased research derived from its ongoing survey of retired NFL players. *ESPN The Magazine* described what happened:

In October 2003, Pellman and members of his committee published the first of a long-running series on concussions in *Neurosurgery*, a scholarly journal edited by Mike Apuzzo, the New York Giants’ neurosurgical consultant. The committee’s earliest studies used crash test dummies to reenact helmet blows. Later, the group decided to explore the ill effects of multiple concussions, and Pellman charged one of its members, Mark Lovell, head of the University of Pittsburgh Medical Center’s Sports Medicine Concussion Program, to oversee the collection and analysis of leaguewide data. Pellman chose Lovell because he had conducted neuropsychological tests for the Steelers as early as 1993. And in 1995, Lovell began to run the NFL’s neuropsychology program, which encouraged teams to gather data to help decide when to return players to games.

Using the information they would obtain, Pellman, Lovell and the committee planned to look at baseline results and identify a normal range of scores for uninjured NFL players. Then, comparing postinjury scores to baseline data would show the effects of concussions. Comparing data from players with multiple concussions to that of all injured players would show whether concussive effects changed as injuries accumulated.

A lot was riding on the analysis. The committee had never imposed recommendations on team medical staffs. **But this was the first study ever to analyze the brain function of NFL athletes. If it showed that concussions were significantly impairing players, the league might be forced to institute new rules for evaluating and treating head injuries.** Pellman and Lovell both say they invited all teams to participate in the research (Lovell says 11 teams elected to join the study) and tried to collect as many results as they could. As Lovell puts it, “More data is always better.” **Several of the doctors involved, however, tell a different story.** [William] Barr [a neuropsychologist at Long Island Jewish Hospital], for example, conducted 217 baseline tests from 1996 to 2001. Periodically, he forwarded results to the league, but at the time Barr learned the committee was planning to publish its results, he had sent only 149. Barr remembers finding Pellman in the Jets' training room in 2003 and saying, “Elliot, I haven't sent data for a year.” **According to Barr, Pellman didn't want the additional tests.** “I don't want the data to be biased because I'm with the Jets,” Barr recalls him saying, suggesting that additional results would skew the data because the Jets would be overrepresented in the sample. **That made no sense to Barr. A scientific study should include, or at least address, all available data.**

Pellman denies this conversation ever took place. “Bill Barr was a consultant for the Jets who tested individual players to help us make decisions,” he says. “I did not discuss the committee's research with him.” **Whoever is right, the fact is the group didn't have all of Barr's data for its paper.**

Barr's wasn't the only research that didn't make the cut. Over the period covered by the committee's research,

Christopher Randolph, a Chicago neuropsychologist, collected baselines for 287 Bears players. **He says Lovell never asked for his data, either.**

Nor did the committee seek complete data from John Woodard, neuropsychologist for the [Atlanta] Falcons and associate psychology professor at the Rosalind Franklin University of Medicine and Science in North Chicago. According to Woodard, in December 2003, Lovell said the league was pressuring him to compile team results. “I was asked to provide data on only concussed players,” **Woodard says. “I had data for slightly more than 200 baseline evaluations. I don't know why I was not asked for them.”**

In 2004, Lovell also asked Richard Naugle, consultant to the Browns and head neuropsychologist at the Cleveland Clinic, for data on just the players who had already suffered concussions, according to an e-mail Naugle wrote to a colleague in March 2005. Naugle declined to comment for this story, citing a confidentiality deal between his medical group and the NFL, but The Magazine has obtained a copy of that message. “I don't have that sorted out from the results of other testing,” Naugle wrote of the request. “I explained that and added that if he could name players, I could send data on those individuals. I recall sending him data on two or three players ... I have a few hundred baselines.”

This means Pellman, Lovell and their colleagues didn't include at least 850 baseline test results in their research—more than the 655 that ultimately made it into their 2004 *Neurosurgery* paper. At best, their numbers were incomplete. At worst, they were biased.

Pellman, Lovell and their colleagues published their sixth paper in *Neurosurgery* in December 2004. It examined baseline data on 655 players and results for 95 players who had undergone both baseline testing and postconcussion testing. It concluded that NFL players did not show a decline in brain function after suffering concussions. Further analysis found no ill effects among those who had three or more concussions or who took hits to the head that kept them out for a week or more.

The paper didn't explain where the players in the groups came from specifically or why certain players were included and hundreds of others were not. Neither Pellman nor Lovell has provided those details since. (Emphases added).

256. Scientists concurred with this assessment. As the *ESPN The Magazine* article noted:

The decision to publish the paper was controversial. “I highly doubt this study would have seen the light of day at this journal were it not for the subject matter of NFL players,” says Robert Cantú, chief of neurosurgery and director of sports medicine at Emerson Hospital in Concord, Mass., and a senior editor at Neurosurgery. “The extremely small sample size and voluntary participation suggest there was bias in choosing the sample. The findings are extremely preliminary at best, and no conclusions should be drawn from them at this time.”

One of the scientists who reviewed the committee's work is equally blunt. “They're basically trying to prepare a defense for when one of these players sues,” he says. “They are trying to say that what's done in the NFL is okay because in their studies, it doesn't look like bad things are happening from concussions. But the studies are flawed beyond belief.” (Emphases added).

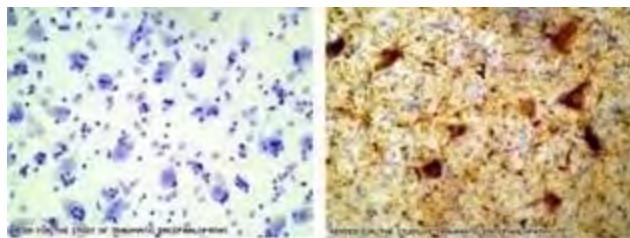
257. Guskiewicz was also quoted as saying, **“[t]he data that hasn't shown up makes their work questionable industry-funded research.”** (Emphasis added).

258. Pellman was not the only NFL hired gun peddling disinformation about head impacts or concussions and brain injuries. Casson and Viano of the NFL's MTBI Committee were playing a similar role, assisted by Lovell.

259. Between 2005 and 2007, Omalu and Dr. Robert Cantu (“Cantu”), Co-Director for the Center for the Study of Traumatic Encephalopathy (“CSTE”) at the Boston

University School of Medicine (“BUSM”), examined the brain tissue of three deceased NFL players: (a) Mike Webster (“Webster”) of the Pittsburgh Steelers, who died of heart failure at the age of 50; (b) Terry Long (“Long”) of the Pittsburgh Steelers, who died at 45 after drinking antifreeze; and (c) Andre Waters (“Waters”) of the Philadelphia Eagles and Arizona Cardinals, who committed suicide at the age of 44. All three of these individuals suffered multiple concussions during their respective NFL careers. All three exhibited symptoms of sharply deteriorated cognitive functions, paranoia, panic attacks, and depression. In articles published in *Neurosurgery* in 2005 and 2006, Omalu found that Webster’s and Long’s respective deaths were partially caused by CTE, related to multiple NFL concussions suffered during their professional playing years. Cantu reached a similar conclusion as to Waters in an article published in *Neurosurgery* in 2007.

260. The following photographs, available from Brain-Pad Blog, show the contrast between a normal brain (depicted on the left) and Webster’s autopsied brain (depicted on the right):



261. **In response to Omalu’s article on Webster, Casson of the NFL’s MTBI Committee wrote a letter in July of 2005 to the editor of *Neurosurgery* asking that Omalu’s article be retracted.**

262. In 2008, Dr. Ann McKee (“McKee”) of the CSTE at BUSM examined the brain tissue of two other deceased NFL players: (a) John Grimsley (“Grimsley”) of the Houston Oilers, who died of a gunshot wound at the age of 45; and (b) Tom McHale (“McHale”) of the

Tampa Bay Buccaneers, Philadelphia Eagles and Miami Dolphins, who died of a drug overdose at the age of 45. McKee found that Grimsley and McHale's brain tissue exhibited indications of CTE. As she stated, **"the easiest way to decrease the incidence of CTE [in contact sport athletes] is to decrease the number of concussions."** (Emphasis added). She further noted that "[t]here is overwhelming evidence that [CTE] is the result of repeated sublethal brain trauma." A *Washington Post* article published in early 2009 reported the following comments by McKee with respect to her analysis of McHale's brain:

"Is this something that happened by chance?" asked Ann McKee, a neuropathologist at Boston University pointing to pictures of McHale's brain that she said resembled that of a 72-year-old boxer. **"I can tell you I've been looking at brains for 22 years, and this is not a normal part of aging. This is not a normal part of the brain."** (Emphasis added).

263. In response to McKee's studies, Casson continued his campaign of NFL-sponsored disinformation by characterizing each as an isolated incident from which no conclusion could be drawn and said he would wait to comment further until McKee's research was published in a peer-reviewed journal. When it was so published in 2009, Casson asserted that **"there is not enough valid, reliable or objective scientific evidence at present to determine whether...repeat head impacts in professional football result in long[-]term brain damage."** (Emphasis added).

264. The increasing controversy drew the attention of Congress. On June 23, 2007, hearings on the NFL's compensation of retired players were held before the Commercial and Administrative Law Subcommittee of the Judiciary Committee of the United States House of Representatives ("C&A Subcommittee"). Plaintiff Boyd testified about post-retirement health

problems he faced as a result of concussions he received while he played for the Minnesota Vikings. Goodell was one of those who testified at this hearing. In follow-up responses to the C&A Committee that Goodell sent in November of 2007, he continued to rely on the discredited survey research being undertaken by the MTBI Committee.

265. In response to these hearings and associated media reports, the League scheduled a Concussion Summit in June of 2007. Independent scientists, including Omalu, Cantu and Guskiewicz, presented their research to League and to representatives of the NFLPA. As one contemporaneous news article reported:

“I’m not even sure we athletes know what a concussion is,” said safety Troy Vincent, who also is president of the NFL Players Association. “Outside of being knocked out, I stayed in the game.”

. . . .

The NFL commission, after reviewing five years of on-field concussions, found no evidence for an increase in secondary brain injuries after a concussion, a conclusion that has met with skepticism.

“Science is very clear that returning guys to play in the same game, or quickly within a few days, contributes to neuron loss and long-term problems,” said former pro wrestler Christopher Nowinski, who retired after repeated concussions and has written a book on the controversy. “With the NFL being both the only and most prominent voice to say it doesn’t exist, it slows down acceptance and adoption of policies to reduce risk.”

While the NFL commission has focused on short-term effects of concussions, recent findings suggest players may suffer depression, dementia and other symptoms later in life. (Emphases added).

266. The result of this conference was a complete whitewash by the NFL of the problem. The League issued a press release and pamphlet to players on August 14, 2007. It stated that:

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. (Emphasis added).

267. This act of denial and deception was consistent with the positions taken by Pellman, Casson, Lovell, and Viano as described above.

268. In November of 2008, NFL spokesman Greg Aiello (“Aiello”) sounded a similar theme, saying to the press that “[h]undreds of thousands of people have played football and other sports without experiencing any problem of this type and there continues to be considerable debate within the medical community on the precise long-term effects of concussions and how they relate to other risk factors.” (Emphasis added). He neglected to mention that the debate was principally between the scientists being paid by the League and scientists operating independently of the League.

269. The disingenuous nature of the NFL position was exposed on September 10, 2009, when the University of Michigan’s Institute for Social Research published a study of retired NFL players commissioned by the NFL Player Care Foundation. The study found that retired NFL players are diagnosed with Alzheimer’s disease or similar medical conditions far more often than the national population—including a rate of 19 times the normal incidence for men aged 30 through 49.

270. Despite these findings from a study that the League sponsored, the NFL continued to deny publicly any link between concussions on the playing field and dementia. A September 29, 2009 *New York Times* article reported as follows:

An N.F.L. spokesman, Greg Aiello, said in an e-mail message that the study did not formally diagnose dementia, that it was subject to shortcomings of telephone surveys and that “there are thousands of retired players who do not have memory problems.”

“Memory disorders affect many people who never played football or other sports,” Mr. Aiello said. “We are trying to understand it as it relates to our retired players.”

As scrutiny of brain injuries in football players has escalated the past three years, with prominent professionals reporting cognitive problems and academic studies supporting a link more generally, the N.F.L. and its medical committee on concussions have steadfastly denied the existence of reliable data on the issue. The league pledged to pursue its own studies, including the one at the University of Michigan.

Dr. Ira Casson, a co-chairman of the concussions committee who has been the league’s primary voice denying any evidence connecting N.F.L. football and dementia, said: “What I take from this report is there’s a need for further studies to see whether or not this finding is going to pan out, if it’s really there or not. I can see that the respondents believe they have been diagnosed. But the next step is to determine whether that is so.”

The N.F.L. is conducting its own rigorous study of 120 retired players, with results expected within a few years. All neurological examinations are being conducted by Dr. Casson. (Emphases added).

271. After the publication of the University of Michigan study, the House Judiciary Committee commenced an inquiry into “Legal Issues Relating To Football Head

Injuries,” and held its first hearing on October 28, 2009. Representative John Conyers (“Conyers”) summarized the evidence:

There appears to be growing evidence that playing football may be linked to long-term brain damage. For example, a 2003 University of North Carolina study found that professional players who suffered multiple concussions were three times more likely to suffer clinical depression than the general population. A follow-up study in 2005 showed NFL players suffering concussions had five times the rate of cognitive impairment. And retired players were 37 percent more likely to suffer from Alzheimer’s than the population as a whole. Earlier this year, the University of Michigan released a study that found that 6.1 percent of NFL players over 50 years of age reported they had received a dementia-related diagnosis—a statistic five times higher than the national average. Players age 30 through 49 showed a rate of 1.9 percent of dementia-related diagnosis 19 times that of the national average.

The National Football League is performing its own long-term study, **and has largely sought to discredit these reports or some of the conclusions drawn from some of these reports.** The football league described the reports as flawed.

Dr. Ira Casson, the co-chair of the NFL’s Mild Traumatic Brain Injury Committee, denied the linkage on six separate occasions. When asked whether there was any linkage between playing football and CTE, Dr. Casson stated that it has never been scientifically, validly documented. The league said the recent University of Michigan study was flawed and that further study was necessary. The *New York Times* data released last week was, they said, for self-promotional and lobbying purposes of the union. Given there is no consensus between the league and its players and the medical community about the causes of these cognitive disorders, it should come as no surprise there is little agreement about how to respond. (Emphases added).

272. Representative Linda Sanchez (“Sanchez”), who had participated in the 2007 hearings mentioned earlier, was present and stated:

There are increasing studies and a body of evidence that show that there is a significant risk to individuals who suffer repeated head trauma, whether it’s in the NFL, in professional boxing, or even high school sports, and while there are those here today who will argue against the validity of some of these studies, there appears to be a preponderance of evidence that a number of professional athletes who suffer repeated head trauma experience physical and mental decline earlier than the general population at large, and it would seem to me—and I stated this to Commissioner Goodell at the last hearing that we held that it would be better for the NFL and the NFLPA to be proactive in alerting its players to the risks that they face, and it’s my hope that in the discussion that we have here today, the NFL and the NFLPA will make continued improvements in educating players on the dangers they face by playing with a concussion, treating those athletes appropriately who do have concussions, and removing the stigma that pressures players to play through the injury, and one of the most recent quotes that was heard on November 29th, 2009, was an interview during the pregame show before the Steelers’ matchup with the Ravens when somebody said, basically, that he had been dinged up and got right back into the game and that, you know, just because somebody’s having headaches, pretty much the quote is, you know, they need to suck it up and continue to play on, and the fact of the matter is that sucking it up and continuing to play on may mean very serious and grave consequences down the line.

Many witnesses that we have had before the Committee have testified about how the NFL, like it or not, influences the lower levels of football, and the actions that they take or the actions that they choose to ignore to take have significant impact on players at lower levels. The NFL, quite frankly, has vast resources available to its disposal to educate coaches and players and medical personnel on the proper way to handle a concussed player, and if they have all these resources available to them and are not addressing the problem, imagine how

can we expect every high school or college to be able to properly treat a concussed player if that proper action isn't being taken at the very top levels of the sport? (Emphases added).

273. Despite this overwhelming evidence, Goodell refused to answer questions of whether NFL-related concussions led to cognitive decline among retired players. The Judiciary Committee played a televised interview of Casson denying any links between NFL players' multiple head injuries and subsequent cognitive deterioration. The widely-publicized videoclip can be found at <http://www.youtube.com/watch?v=R4NbU_HaB3Y>.

274. Sanchez pressed the issue with Goodell during his testimony as follows:

Now, the question that I have for you is, I am a little concerned, and I hear the concern expressed by some of the witnesses on the panel today, that **the NFL sort of has this kind of blanket denial or minimizing of the fact that there may be this, you know, link. And it sort of reminds me of the tobacco companies pre-1990's when they kept saying no, there is no link between smoking and damage to your health or ill health effects. And they were forced to admit that that was incorrect through a spate of litigation in the 1990's.** And my question to you is wouldn't the league be better off legally, and wouldn't high school and college football players be better off, if instead of trying to minimize this issue, the league took the opposite perspective and said, look, even if there is a risk, however minuscule, that there may be this link, so we really need to jump on top of it and make kids and parents aware of this so that there isn't this sort of sense that the NFL is really just slow walking the issue to death by saying, well, we have been studying the issue for 15 years, we are going to maybe study it another 15 more years, when there is already non-NFL paid for research that suggests that there is this very high correlation with cognitive impairment? Don't you think the league, you know, would be better off legally, and that our youth might be a little bit better off in terms of knowledge, if you guys just embraced that there is research that suggests this and admitted to it? (Emphases added).

Mr. GOODELL. Well, Congresswoman, I do believe that we have embraced the research, the medical study of this issue. As you point out——

Ms. SANCHEZ. You are talking about one study, and that is the NFL's study. You are not talking about the independent studies that have been conducted by other researchers. Am I correct in stating that?

Mr. GOODELL. I am not sure of your question.

Ms. SANCHEZ. There are other studies, research in dementia and CTE that show that there is a link. But again the league seems to downplay that and say, well, you know, we are conducting our own study and, you know, when we have that study completed then we will know.

Mr. GOODELL. No, I think what we are doing is because we have to a large extent driven this issue by making sure that we have medical professionals studying this issue. I am not a medical professional.

[Ms. SANCHEZ.] **So my question is why are you even going through, you know, the charade of presenting the final analysis of going through this study if the determination, in my opinion, has already been made by Dr. Casson and, you know, is denied in the pamphlet that they hand out to NFL players?**

Mr. GOODELL. Well, first let me say I do not, and I think you stated that he is the only one examining these patients and the findings. That is not correct.

Ms. SANCHEZ. He is not controlling the examinations or the findings?

Mr. GOODELL. I would not say he is controlling that at all, no.

Ms. SANCHEZ. He is participating in it, though.

Mr. GOODELL. I do not know if he is participating in the examinations. I can find that out.

Ms. SANCHEZ. And he has been a consultant to the NFL, is that correct?

Mr. GOODELL. He has been on our MTBI committee for several years, yes.

Ms. SANCHEZ. And some of the people who are participating in this study have other conflicts of interest. You know, one of the committee members on the concussion committee owns the company that makes and markets, mainly through its use by most of the NFL teams, the neuropsychological test that is used in the study. Isn't that true?

Mr. GOODELL. I don't know the answer to that question, but I will find out for you.

Ms. SANCHEZ. My suggestion would be, and my time has expired, but my suggestion would be that instead of having NFL-connected consultants and doctors, that perhaps the true findings of a truly unbiased study would be better conducted by people who have not been on the payroll or not been retained by the NFL in any capacity. (Emphases added).

275. The NFL thereafter reacted to this barrage of criticism by having Casson and Viano, who had replaced Pellman as co-chairs of the MTBI Committee, resign, and suspending that Committee's research. The League also pledged to donate a paltry \$1 million to subsidize the CSTE's research on CTE.

276. On December 2, 2009, Goodell announced an update on concussion guidelines for the League's players. The statement outlined several changes. First, players who sustained a concussion should not return to practice or game play the same day if the following signs or symptoms are present: loss of consciousness, confusion, amnesia or other memory problems, abnormal neurological exam, new and persistent headache, or any other persistent concussion signs. Second, if a player is held from a game, clearance for return to play should be

determined by both the team physician and an independent neurological consultant. Return to play should not be considered until the athlete is asymptomatic, both at rest and with exertion, has a normal neurological exam, and has normal neuropsychological testing. The NFL subsequently clarified that primary sports care physicians could be treated as independent neurological consultants.

277. Aiello, the League spokesperson who had made staunch denials of the link between concussions and brain injury as late as September of 2009, made the following admission in a December 20, 2009 interview with a reporter for the *New York Times*:

After weeks of transforming its approach to concussions and its research into their long-term effects among players, the N.F.L. not only announced Sunday that it would support research by its most vocal critics but also conceded publicly for the first time that concussions can have lasting consequences.

“It’s quite obvious from the medical research that’s been done that concussions can lead to long-term problems,” the league spokesman Greg Aiello said in a telephone interview. He was discussing how the league could donate \$1 million or more to the Center for the Study of Traumatic Encephalopathy at Boston University, whose discoveries of brain damage commonly associated with boxers in the brains of deceased football players were regularly discredited by the N.F.L.

Told that his statement was the first time any league official had publicly acknowledged any long-term effects of concussions, and that it contradicted past statements made by the league, its doctors and literature currently given to players, Aiello said: “We all share the same interest. That’s as much as I’m going to say.”

Since an Oct. 28 hearing before the House Judiciary Committee, when the league’s approach to science was compared to that of the tobacco industry, the N.F.L. has accepted the resignations of the co-chairmen of its concussion committee and overhauled its policies toward

concussion management. Players now must be cleared by brain-injury experts unaffiliated with the team, and cannot return to a game or practice in which they have shown any significant sign of concussion.

The second rule has since been recommended by an N.C.A.A. committee as standard policy for athletes in all sports, and will be considered by several state legislatures that have bills governing high school athletics before them.

The recent changes by the N.F.L. had amounted to tacit acknowledgments that it was no longer able to defend a position that conflicted with nearly all scientific understanding of head trauma.

Until recently, the league and its committee on concussions had consistently minimized evidence testifying to the risks of repeated brain trauma in N.F.L. players — from researchers like those at Boston University, to phone surveys the league itself commissioned, to demographic analysis of players known to have early-onset dementia. While discrediting such evidence, a pamphlet on concussions currently given to players states, “Research is currently underway to determine if there are any long-term effects of concussion in N.F.L. athletes.”

That research study, conducted by the N.F.L.’s committee on concussions, was recently suspended amid strong criticism of its design and execution by outside experts, players and members of Congress.

“Mr. Aiello’s statement is long overdue — it’s a clear sign of how the culture of football has changed in recent months,” Dr. Robert Stern, a co-director of the Boston University center and its Alzheimer’s Disease Clinical and Research Program, said in a telephone interview.

“There is no doubt that repetitive blows to the head result in long-term problems in the brain, including progressive dementia. With the N.F.L. taking these recent actions, we are finally at a point to move forward in our research and ultimately solve this important problem — for professional athletes and collegiate and youth players.” (Emphases added).

278. In March of 2010, the MTBI Committee got a new name and new co-chairs. It was rechristened as the Head, Neck and Spine Medical Committee, and became jointly chaired by Dr. H. Hunt Batjer (“Batjer”) of Northwestern Memorial Hospital, and Dr. Richard Ellenbogen (“Ellenbogen”) of Harborview Medical Center in Seattle. Batjer and Ellenbogen replaced Casson and Viano, who in turn had replaced Pellman.

279. In a May 2010 Congressional hearing, Representative Anthony Weiner addressed Batjer and Ellenbogen as follows: “[y]ou have years of an infected system here, [and] your job is...to mop [it] up.” (Emphasis added).

280. Batjer and Ellenbogen conceded in June of 2010 that the League’s efforts with respect to concussions and brain injury were riddled with duplicity, conflicts of interest and shocking ineptitude. As was reported in a June 1, 2010 *New York Times* article:

They accused a fellow doctor of minimizing solid evidence of the dangers of football concussions. They concurred that data collected by the N.F.L.’s former brain-injury leadership was “infected,” said that their committee should be assembled anew, and formally requested that the group’s former chairman, Dr. Elliot Pellman, not speak at a conference Wednesday.

For the first time these remarks came not from outside critics of N.F.L. research but from those now in charge of it — Dr. H. Hunt Batjer and Dr. Richard G. Ellenbogen, prominent neurosurgeons who became co-chairmen of a new league committee in March. One week after two members of Congress accused the doctors of sounding too much like their predecessors, and on the eve of a league-sponsored symposium in Washington held by Johns Hopkins Medicine, Batjer and Ellenbogen made clear they planned to chart a new course.

The two doctors criticized Johns Hopkins’s promotional brochure for Wednesday’s conference — which was open only to N.F.L. medical personnel, other doctors and

members of the United States Department of Defense — for playing down existing evidence of brain damage in retired football players.

The opening paragraph described the disease chronic traumatic encephalopathy as “now being reported in football players, although with unknown frequency.” It added that these and related matters had been reported by the news media “with considerable hype around assertions of long-term harm to players from head injuries.”

Batjer and Ellenbogen said that the frequency of reports of C.T.E. in players is not unknown — a Boston University research group has diagnosed it in all 12 former college and N.F.L. players of various ages it had tested for the condition.

“They aren’t assertions or hype — they are facts,” said Ellenbogen, the chief of neurological surgery at Harborview Medical Center in Seattle, who has been instrumental in drafting legislation to protect young athletes from head injuries.

He added: “Doctors were relatively ineffectual for 25 years on this issue. Then it’s on the front page and everything focuses like a laser beam and things begin to change from baby steps to giant steps forward protecting kids. From a doctor-patient perspective, it’s been the single best thing that has happened to this subject.”

Dr. Constantine G. Lyketsos, a professor of psychiatry and behavioral sciences at Johns Hopkins who is directing Wednesday’s conference, said in a telephone interview that he wrote the brochure and that the N.F.L. had no role with the event, other than providing financing. He defended his choice of words.

“We know of 12 cases” of C.T.E., Lyketsos said. “We don’t know how many don’t have it.”

Regarding news media coverage of the harm caused by repeated concussions in football players, Lyketsos said: “There is a concern that I have that the possibility of serious long-term consequences are being

overemphasized without clear evidence. It could turn out correct. It could turn out incorrect. We don't know."

He added: "I worry that it might be a disservice. That's a possibility."

The league spokesman Greg Aiello declined to comment on Lyketsos's statements, other than saying that the league has given \$1 million to the Boston University group to support its research.

The former leaders of the N.F.L. concussion committee generally agreed with Lyketsos, an attitude that ultimately came to the attention of Congress and led to several hearings on the subject of sports concussions in athletes of all ages. Batjer and Ellenbogen had a shaky debut before some frustrated members of the House Judiciary Committee during a forum in New York on May 24, but in the following days they made sure they would no longer resemble their predecessors.

The doctors said the old committee's ongoing studies on helmets and retired players' cognitive decline — whose structure and data were strongly criticized by outside experts — would not be used in any way moving forward. They said they were influenced by a comment made to them last Monday by Representative Anthony D. Weiner, Democrat of New York: "You have years of an infected system here that your job is to some degree to mop up."

"The word 'infected' hit me right between the eyes," said Ellenbogen. He and Batjer became co-chairmen of the N.F.L. committee in March.

Batjer added: "We all had issues with some of the methodologies described, the inherent conflict of interest that was there in many areas that was not acceptable by any modern standards or not acceptable to us. I wouldn't put up with that, our universities wouldn't put up with that, and we don't want our professional reputations damaged by conflicts that were put upon us."

Batjer said that he and Ellenbogen had begun reconstituting their committee from scratch. He said that

six members had been selected so far, none of them holdovers from the prior regime.

The doctors so wanted to distance themselves from the past that on Monday they requested that Pellman, who was scheduled to deliver some opening remarks at the Johns Hopkins symposium, be removed from the program. Pellman was the chairman of the N.F.L. concussion committee from 1994 to 2007 and stayed on it until he resigned in March. He remains the league's medical director and helped with the conference's logistics.

On Tuesday, an e-mail message was distributed to conference organizers saying that Pellman would not attend the conference for family-related reasons.

“Neither Rich nor I thought he should appear to represent the N.F.L. in what would look like a leadership role,” Batjer said. “It’s not about Elliot. It’s about a complete severance from all prior relationships from that committee.” (Emphases added).

281. As reported in a July 26, 2010 article in the *New York Times*, on June 10, 2010, the NFL issued a warning poster that was placed in the locker rooms of member clubs and was also turned into a pamphlet. A copy of the poster is reproduced below. It stands in stark contrast to the pamphlet issued by the League in April of 2007. This advice was never given previously by the NFL and was certainly not given to players who retired prior to June of 2010. As the same article went on to note:

The league's reversal is not necessarily complete. On April 30, an outside lawyer for the league, Lawrence L. Lamade, wrote a memo to the lead lawyer for the league's and union's joint disability plan, Douglas Ell, discrediting connections between football head trauma and cognitive decline. The letter, obtained by The *New York Times*, explained, “We can point to the current state of uncertainty in scientific and medical understanding” on the subject to deny players' claims that their neurological impairments are related to football. (Emphases added).



CONCUSSION

A Must Read for NFL Players

Let's Take Brain Injuries Out of Play



Concussion Facts

Concussion is a **brain injury** that alters the way your brain functions

Concussion can occur from a blow to the head/body:

- following helmet to helmet contact, and / or
- contact with the ground, object or another player

Most concussions occur without being knocked unconscious

Severity of injury depends on many factors and is not known until symptoms resolve and brain function is back to normal

All concussions are not created equally. Each player is different, each injury is different and all injuries should be evaluated by your team medical staff

Concussion Symptoms

Different symptoms can occur and may not show up for several hours. Common symptoms include:

- Confusion
- Headache
- Amnesia / Difficulty remembering
- Balance problems
- Irritability
- Dizziness
- Difficulty concentrating
- Nausea
- Feeling sluggish, foggy or groggy
- Sensitivity to noise
- Sensitivity to light
- Double / fuzzy vision
- Slowed reaction time
- Feeling more emotional
- Sleep disturbances
- Loss of consciousness

Symptoms may worsen with physical or mental exertion (e.g. lifting, computer use, reading)

Why Should I Report My Symptoms?

- Practicing or playing while still experiencing symptoms can prolong the time to recover and return to play.
- Unlike other injuries, there may be significant consequences of "playing through" a concussion. Repetitive brain injury, when not treated promptly and properly may cause permanent damage to your brain.

What Should I Do If I Think I've Had a Concussion?

Report it. Never ignore symptoms even if they appear mild. Look out for your teammates. Tell your Athletic Trainer or Team Physician if you think you or a teammate may have had a concussion.

Get Checked Out. Your team medical staff has your health and well being as its first priority. They will manage your concussions according to NFL / NFLPA Guidelines which include being fully asymptomatic, both at rest and after exertion, having a normal neurologic examination, normal neuropsychological testing, and clearance to play by both the team medical staff and the independent neurologic consultant.

Take Care of Your Brain. According to the CDC*, "traumatic brain injury can cause a wide range of short- or long term changes affecting thinking, sensation, language, or emotions". These changes may lead to problems with memory and communication, personality changes, as well as depression and the early onset of dementia. Concussions and conditions resulting from repeated brain injury can change your life and your family's life forever.



Work smart. Use your head,
don't lead with it. Help make
our game safer. Other athletes
are watching...



*for more information about traumatic brain injury and concussion, go to <http://www.cdc.gov/concussion>

282. Yet even after this new warning, NFL players are still going out on the field after receiving significant concussions. In a September 19, 2010 posting by Sam Donellon on philly.com, it was noted:

A THOUSAND pardons. For the game plan, for the execution, for the ever-present “Not putting the guys in the right places” to succeed during Sunday's 27-20 loss to the Green Bay Packers.

[Philadelphia Eagles Head Coach] Andy Reid issued his familiar post-loss mea culpas yesterday, vowing to “tighten up” special teams play, execution particularly on offense, and even his play-calling.

The only thing he didn't apologize for was how, or why, two of his stars were allowed to re-enter the game after getting concussed Sunday afternoon at Lincoln Financial Field.

That's because in his mind, and apparently in the minds of too many still involved in the NFL, he and his medical staff did what it was supposed to do in the cases of Stewart Bradley and Kevin Kolb. Asked all the right questions, got all the right answers, sent both back into a game even after both had displayed, for a national audience to see, evidence of head trauma.

To wit:

Kolb lying face down for several seconds before rising slowly, grass hanging from his facemask, walking slowly from the field;

Bradley bouncing up after an inadvertent knee-to-helmet hit, only to stumble back down to the ground, clearly disoriented.

That's a key word, disoriented. It's used in those famous updated guidelines the NFL issued last December to teams regarding concussions in the wake of congressional hearings and some high-profile injuries, including the repeated concussions to former Eagle Brian Westbrook.

“A player who suffers a concussion should not return to play or practice on the same day,” said an NFL release on those guidelines, which lists among symptoms “Loss of consciousness” and “Confusion as evidenced by disorientation to person, time or place; inability to respond appropriately to questions; or inability to remember assignments or plays.”

So what are we missing here? Reid said repeatedly Sunday, and again yesterday, that appropriate answers were given to questions. He said Kolb's inability to remember plays was only evident after he returned to play, and he was yanked after a three-and-out series.

But both men were clearly disoriented when they first reached their feet, and this is where we tread into the NFL's continued ambiguity over what it views as serious head trauma. Was Bradley's stumble due to poor balance or dizziness? The guidelines say poor balance necessitates removal, dizziness not necessarily so. But what's the difference and how the hell can anyone tell? Aren't they the same thing?

283. As another example, the Concussion Blog reported on Austin Collie (“Collie”), a wide receiver who played for the Indianapolis Colts in 2010. Collie suffered a concussion in Week 9 of the regular season and was benched in Week 10. He returned in Week 11, and was withdrawn after playing part of that game because of “worsening symptoms.” He was benched in Weeks 12-14, but returned in Week 15, only to receive yet another concussion. As Concussion Blog noted:

NFL “Policy” indicates that a player will not return from a concussion unless they pass all tests. Therefore if Indianapolis followed the “policy” then Collie was cleared and passed all tests by Week 11, and his first concussion resolved. The reports of more/worsening symptoms after 1st half of Pats game indicates that he MUST have sustained a second concussion. Then upon returning this week that would have meant that he cleared all tests and AGAIN sustained a concussion, his THIRD. Let me be clear here, you can only “aggravate” a concussion if you have not recovered from the first. And

a player SHOULD NOT be playing with an unresolved concussion, by “policy”. ... The Colts already are spinning this one, but no matter how you look at it they either failed the “policy” or knowingly put him back into action with a concussion. At the very least they misreported the second. If he were returned in Week 11 and “aggravated” it then he was not properly handled the first time.

284. While these issues remain unresolved, retired NFL players continue to die from brain injuries caused during their time playing for the NFL. One example is provided by the case of Dave Duerson (“Duerson”), a former safety for the Chicago Bears and the New York Giants. After suffering months of headaches, blurred vision and deteriorating memory, Duerson committed suicide at the age of 50 on February 17, 2011. His final note asked that his brain be given to the NFL brain bank for evaluation.

285. On May 2, 2011, researchers at CTSE at Boston University reported that Duerson was suffering from CTE and released photographs of the autopsy of his brain. Examples of those photographs obtained from the website of CBS Chicago are reproduced below:



The top row of photographs depicts three half sections of Duerson’s brain that exhibit multiple areas of damage (brown coloring) in the frontal and temporal cortex, hippocampus and

amygdala. The bottom row of photographs depicts microscopic images from these damaged areas, showing severe neurodegeneration. As CBS Chicago reported:

Dr. Robert Cantu, co-director of the CTSE, said at a news conference that such results normally are published first, but the Duerson family wanted them released earlier.

“It is our hope that through this research questions that go beyond our interests may be answered,” The Duerson family said in a statement. “Questions that lead to a safer game of football, from professional to Pop Warner; Questions that lead to better diagnostic tests for those alive; and Questions that lead to a cure; will all hopefully be answered.” (Emphases added).

286. When this information was reported, DeMaurice Smith, Executive Director of the NFLPA, stated that the fact that Duerson was suffering from CTE “makes it abundantly clear what the cost of football is for the men who played and the families. It seems to me that any decision or course of action that doesn’t recognize that as the truth is not only perpetuating a lie, but doing a disservice to what Dave feared and what he wanted to result from the donation of his brain to science.”

287. Another example is provided by the case of John Mackey (“Mackey”), the former tight end of the Chicago bears, who died in July of 2011. Mackey was diagnosed with frontotemporal dementia in 2007, forcing him to live full-time in an assisted living facility. The NFLPA refused to pay a disability income to him because it claimed that there was no proven direct link between brain injury and NFL game participation. Ultimately, Mackey received payments under an NFL benefit plan, but they were far less than his family’s costs. Mackey made less than a total of \$500,000 during his decade-long NFL career. His wife, Sylvia, had to work as a flight attendant to supplement his NFL pension of \$2,500 a month after they sold their California home to provide for his extensive medical care. The legendary Chicago Bears player,

Gale Sayers, was asked about Mackey's demise by a reporter for the *Chicago Tribune* and his response was reported as follows: "Sayers feels the NFL could have done more to help Mackey during his final years. 'You know, John Mackey died at 60-something (69),' said Sayers. '(The NFL) could have helped him more, I felt. But they didn't, and the players (NFLPA) could have helped more, and it didn't happen.'"

288. On information and belief, proposals have been submitted to the NFL MTBI Committee about concussion concerns and the need to do regularized testing of players. To the best of Plaintiffs' knowledge, the League has never acted on them.

289. During the telecast of Super Bowl XLVI on February 5, 2012, the NFL aired a 60 second safety commercial believed to have been prepared by NFL Properties. It depicted the evolution of the game, showing how certain playing techniques (*e.g.*, the "flying wedge," abandoned long before the NFL came into existence, or the "clothesline tackle") have ceased being used. The commercial did not mention the duplicitous industry of the MTBI, the League's flip-flop on concussion warnings to players, how its 2010 concussion guidelines are routinely flouted, and how recidivist violators like James Harrison (who has had five illegal hits on quarterbacks in three seasons) are allowed to continue to play the game. Brad Adgate, a Senior Vice-President of Horizon Media, was quoted as follows about this advertisement:

The one kind of black eye the N.F.L. has is probably the health of its players, and this is a great opportunity to target soccer moms who let their kids play....The object of the Super Bowl ad is not only to be entertaining, it's also to sell a product. This is a subject the N.F.L. has been very touchy about.

Finally, they have adjusted that this is a serious issue.

290. The NFL's conduct stands in sharp contrast to what has been done or promulgated by other sports or medical bodies.

291. For example, Rule 4.2.14 of the World Boxing Council's Rules and Regulations states: “[b]oxers that suffered concussion by KO, should not participate in sparring sessions for 45 days and no less than 30 days after concussive trauma, including but not limited to KO's, and should not compete in a boxing match in less than 75 days.” (Emphasis added).

292. The Second International Conference on Concussion in Sport met in Prague in 2004 and released the following statement: “[w]hen a player shows ANY symptoms or signs of a concussion . . . the player should not be allowed to return to play in the current game or practice When in doubt, sit them out!” (Emphasis added). This directive echoed the position taken by the First International Conference on Concussion in Sport, held in Vienna in 2001.

293. As ESPN has noted, “[a]ll standard U.S. guidelines, such as those first set by the American Academy of Neurology and the Colorado Medical Society, agree that athletes who lose consciousness should never return to play in the same game.” (Emphasis added).

294. Another example is provided by the National Collegiate Athletic Association (“NCAA”), which also recognized inexcusably late the link between head impacts and brain injuries, not taking affirmative action until 2010. The NCAA is the subject of class action suits for this tardiness. Nevertheless, once it did act, it did so in a manner that was more decisive than the NFL. The NCAA's webpage on concussion-related resources (see <http://www.ncaa.org/wps/portal/ncaahome?WCM_GLOBAL_CONTEXT=/ncaa/NCAA/Acade

mics+and+Athletes/Personal+Welfare/Health+and+Safety/Concussion>) indicates that it has entered into an educational partnership with the Centers for Disease Control and Prevention. The NCAA has supplied each member college campus with two posters and two sets of fact sheets addressing concussion awareness, prevention, and management. It has issued the “NCAA Sports Medicine Handbook - Guideline on Concussions in the Athlete” that recommends best practices. And the NCAA requires each member college to develop a “Concussion Management Plan.” One exemplar plan offered on the NCAA’s website is the University of Georgia Athletic Association’s (“UGAA”) “Concussion Management Guidelines,” which read as follows:

1. **UGAA will require student-athletes to sign a statement in which student-athletes accept the responsibility for reporting their injuries and illnesses to the sports medicine staff, including signs and symptoms of concussions (attachment A).** During the review and signing process student-athletes will watch a NCAA video on concussions and be provided with educational material¹ on concussions (attachment B).
2. **UGAA will have on file and annually update an emergency action plan (attachment C) for each athletics venue to respond to student-athlete catastrophic injuries and illnesses,** including but not limited to concussions, heat illness, spine injury, cardiac arrest, respiratory distress (*e.g.* asthma), and sickle cell trait collapses. All athletics healthcare providers and coaches shall review and practice the plan annually. These sessions will be conducted prior to the start of the sport season. ...The UGAA compliance office will maintain a list of staff that have completed the requirement on file.
3. **UGAA sports medicine staff members shall be empowered to determine management and return-to-play of any ill or injured student-athlete, as he or she deems appropriate.** Conflicts or concerns will be forwarded to Ron Courson (director of sports medicine) and Fred Reifsteck, MD (head team physician) for remediation.

4. UGAA shall have on file a written team physician–directed concussion management plan (attachment D) that specifically outlines the roles of athletics healthcare staff (e.g., physician, certified athletic trainer, nurse practitioner, physician assistant, neuropsychologist). In addition, the following components have been specifically identified for the collegiate environment:

a. UGAA coaches will receive a copy of the concussion management plan, a fact sheet on concussions in sport, and view a video on concussions annually. The UGAA compliance office will maintain a list of staff that have completed the requirement on file.

b. UGAA sports medicine staff members and other athletics healthcare providers will practice within the standards as established for their professional practice (e.g., team physician, certified athletic trainer, physical therapist, nurse practitioner, physician assistant, neurologist, neuropsychologist).

c. UGAA shall record a baseline assessment for each student-athlete in the sports of baseball, basketball, cheerleading, diving, equestrian, football, gymnastics, pole vaulting, soccer, and softball, at a minimum. In addition, a baseline assessment will be recorded for student-athletes with a known history of concussion. The same baseline assessment tools should be used post-injury at appropriate time intervals. The baseline assessment should consist of the use of: 1) symptoms checklist, 2) standardized balance assessment (Neurocom) and 3) neuropsychological testing (computerized IMPACT test). Neuropsychological testing has been shown to be effective in the evaluation and management of concussion. The neuropsychological testing program should be performed in consultation with a neuropsychologist. Post injury neuropsychological test data will be interpreted by a neuropsychologist prior to return to play. Neuropsychological testing has proven to be an effective tool in assessing neurocognitive changes following concussion and can serve as an important component of an institution's concussion management plan. However, neuropsychological tests should not be used as a

standalone measure to diagnose the presence or absence of a concussion as UGAA uses a comprehensive assessment by its sports medicine staff.

d. When a student-athlete shows any signs, symptoms or behaviors consistent with a concussion, the athlete will be removed from practice or competition, by either a member of the coaching staff or sports medicine staff. If removed by a coaching staff member, the coach will refer the student-athlete for evaluation by a member of the sports medicine staff. During competitions, on the field of play injuries will be under the purview of the official and playing rules of the sport. UGAA staff will follow such rules and attend to medical situations as they arise. Visiting sport team members evaluated by UGAA sports medicine staff will be managed in the same manner as UGAA student-athletes.

e. A student-athlete diagnosed with a concussion will be withheld from the competition or practice and not return to activity for the remainder of that day. Student-athletes that sustain a concussion outside of their sport will be managed in the same manner as those sustained during sport activity.

f. The student-athlete will receive serial monitoring for deterioration. Athletes will be provided with written home instructions (attachment E) upon discharge; preferably with a roommate, guardian, or someone that can follow the instructions.

g. The student-athlete will be monitored for recurrence of symptoms both from physical exertion and also mental exertion, such as reading, phone texting, computer games, watching film, athletic meetings, working on a computer, classroom work, or taking a test. Academic advisors and professors will be notified of student-athlete's concussion, with permission for release of information from the student-athlete.

h. The student-athlete will be evaluated by a team physician as outlined within the concussion management plan. Once asymptomatic and post-exertion assessments are within normal baseline limits,

return to play shall follow a medically supervised stepwise process.

i. Final authority for Return-to-Play shall reside with the team physician or the physician's designee as noted in the concussion management flowchart.

5. UGAA will document the incident, evaluation, continued management, and clearance of the student-athlete with a concussion. Aggregate concussion numbers per sport will be reported to the Director of Athletics annually.

6. Athletics staff, student-athletes and officials will continue to emphasize that purposeful or flagrant head or neck contact in any sport should not be permitted.

B. Riddell's Participation With The NFL In Misrepresenting The Risk Of Repeated Head Impacts.

295. Riddell manufactures helmets for use by NFL players. Since 1989, with the support of NFL and NFL Properties, Riddell has manufactured the official helmet for the League and is the only helmet manufacturer allowed to display its logo on helmets used in League games. Prior to the commencement of the 2010 season, Riddell renewed its contract with the League allowing it to continue as the NFL's primary helmet provider through 2014. The NFL has estimated that 75% of the helmets used in the League are manufactured by Riddell; Riddell estimated that the figure was 77%.

296. Riddell has long been aware of medical issues concerning concussions. Yet despite being the maker of the official helmet for the NFL, it did nothing to prevent the disinformation campaign engaged in by the League that is described in the preceding paragraphs.

297. Indeed, Riddell actively abetted the work of the NFL's MTBI Committee. In 1997, it became part of that Committee's project of assessing concussions and health consequences to NFL players by analyzing and reconstructing head impacts.

298. In 2006, Riddell sponsored a study that appeared in *Neurosurgery* that was co-authored by Lovell, Dr. Joe Maroon of the MTBI Committee, and Dr. Mickey Collins of the University of Pittsburgh Medical Center, who works closely with various NFL member clubs, that touted Riddell's "Revolution" helmet (introduced in 2002) as reducing the incidence of concussions in over 2000 high school athletes in Western Pennsylvania. Cantu publicly criticized the study as being worthless.

COUNT I
Action For Declaratory Relief

299. Plaintiffs repeat and reallege each of the allegations contained in the foregoing paragraphs.

300. There is a case and controversy among Plaintiffs on the one hand and the Defendants on the other.

301. Pursuant to 28 U.S.C. § 2201, Plaintiffs seek a declaration as to the following.

302. They seek a declaration that Defendants knew or reasonably should have known that the repeated traumatic brain and head impacts, as well as concussions, suffered by Plaintiffs while playing NFL football were likely to put them at excess risk of neurodegenerative disorders and diseases including but not limited to CTE, MCI, Alzheimer's disease or similar cognitive-impairing conditions.

303. Plaintiffs seek a declaration that the Defendants, through their voluntary undertakings, had a duty to advise players and protect players from these risks.

304. Plaintiffs seek a declaration that the Defendants willfully and intentionally misled Plaintiffs concerning these medical risks.

305. Plaintiffs seek a declaration that the Defendants thereby recklessly endangered Plaintiffs.

COUNT II
Action For Negligence

306. Plaintiffs repeat and reallege each of the allegations contained in the foregoing paragraphs.

307. The NFL has historically assumed a gratuitous independent tort duty to create and enforce rules that protect the health and safety of its players, and it has violated Section 323 of the Restatement (Second) of Torts, and the common law.

308. Throughout the history of the NFL, the League has purported to exercise its duty to protect the health and safety of its players by implementing rules, policies and regulations in a purported attempt to best protect its players.

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

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

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

312. The NFL failed to establish any adequate guidelines or policies to protect the mental health and safety of its players. As explained above, the guidelines that the League offered in 2007 were false and misleading and failed to apprise Plaintiffs of the risks associated with on-field concussions

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

- (a) Failure to use reasonable care in the research of the concussions issue;
- (b) Failure to use reasonable care in responding to independent scientific studies on the risk of concussions and brain disease in sport, and in football in particular;
- (c) Failure to use reasonable care in denying the scientific evidence connecting NFL play to the risk of an occurrence of brain disease;
- (d) Failure to use reasonable care in appointing competent and independent doctors and scientists to the MTBI Committee; and
- (e) Failure to use reasonable care in protecting Plaintiffs from the risk of brain disease and the sequelae of the concussions experienced by Plaintiffs.

314. Plaintiffs relied on the Defendants' misrepresentations (including affirmative misrepresentation and omissions) detailed herein to their detriment.

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

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

317. If the NFL would have taken the necessary steps to oversee and protect the NFL players, including Plaintiffs, by developing and implementing necessary guidelines, policies, and procedures; providing reasonably safe helmets; and educating and training all persons involved with the NFL clubs in the recognition, prevention, and treatment of concussive brain injuries, the NFL players, such as Plaintiffs, would not have suffered from the subject condition or the effects of that condition, would have recovered more rapidly, or would not have suffered long-term brain damage, including CTE, MCI, Alzheimer's disease or similar cognitive-impairing condition.

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

319. The NFL committed acts of omission and commission, which collectively and severally, constituted negligence. The League's negligence was a proximate and producing cause of injuries suffered by Plaintiffs.

320. In addition to the injuries suffered by Plaintiffs described herein, defendants' negligent conduct caused or contributed to the personal injuries of the individual named plaintiffs including neurodegenerative disorders and diseases including but not limited to CTE, MCI, Alzheimer's disease or similar cognitive-impairing conditions, past and future medical expenses, past and future loss of earnings, past and future emotional distress, and punitive damages.

321. As a result of the injuries of Plaintiffs, they are entitled to damages, as alleged herein or allowed by law.

COUNT III
Action For Fraud

322. Plaintiffs repeat and reallege each of the allegations contained in the foregoing paragraphs.

323. Until June of 2010, the NFL, through its MTBI Committee, the statements and actions of its Commissioner and its other agents and employees, made material misrepresentations (and omissions) to its players, former players, the Congress and the public at large that there was no link between concussions and brain injury, including CTE, MCI, Alzheimer's disease or similar cognitive-impairing conditions.

324. The persons who made the misrepresentations as agents of the NFL and the NFL knew the statements were false.

325. The persons who made the misrepresentations as agents of the NFL and the NFL intended to defraud the Plaintiffs.

326. The Plaintiffs justifiably relied on these misrepresentations to their detriment in getting care for their injuries.

327. The Plaintiffs were damaged by these misrepresentations.

328. In addition to the injuries suffered by Plaintiffs described herein, Defendants' fraudulent conduct caused or contributed to the personal injuries of the individual named plaintiffs including neurodegenerative disorders and diseases including by not limited to CTE, MCI, Alzheimer's disease or similar cognitive-impairing conditions, past and future medical expenses, past and future loss of earnings, past and future emotional distress, and punitive damages.

329. As a result of the injuries of Plaintiffs, they are entitled to the damages, as alleged herein or allowed by law.

COUNT IV
Fraudulent Concealment

330. Plaintiffs repeat and allege each of the allegations contained in the foregoing paragraphs.

331. Defendants and their MTBI Committee concealed and misrepresented information to the Plaintiffs and the public regarding the brain disease risks of repeated head impacts and concussions in NFL play, over the time period relevant to this Complaint.

332. At no time prior to June 2010 did Defendants correct their misrepresentations. Even after June 2010, Defendants have failed to adequately advise Plaintiffs and the public of these risks.

333. Defendants knew their statements in regard to concussions and medical risks were false, and they knew the Plaintiffs would specifically rely on these statements.

334. In addition to the injuries suffered by Plaintiffs described herein, Defendants' negligent conduct caused or contributed to the personal injuries of the Plaintiffs including neurodegenerative disorders and diseases including but not limited to CTE, MCI, Alzheimer's disease or similar cognitive-impairing conditions, past and future medical expenses, past and future loss of earnings, past and future emotional distress, and punitive damages

335. As a result of the injuries of Plaintiffs, they are entitled to the damages, as alleged herein or allowed by law.

COUNT V
Action for Loss of Consortium

336. Plaintiffs repeat and reallege each of the allegations contained in the foregoing paragraphs.

337. Spouses of Plaintiffs have suffered damages in the past and will suffer damages in the future as a direct result of the injuries described above.

338. Spouses of Plaintiffs seek to recover for past and future loss of consortium and other harm to their relationship and marriage.

339. As a result of the injuries of Plaintiffs, spouses of Plaintiffs are entitled to the damages, as alleged herein or allowed by law.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs pray for judgment with respect to their Complaint as follows:

1. With respect to Count I, granting the declaratory relief requested pursuant to 28 U.S.C. § 2201;
2. With respect to Counts II through V, granting compensatory and punitive damages where applicable;
3. With respect to all counts, awarding Plaintiffs their costs and disbursements in this action, including reasonable attorneys' fees, to the extent permitted by law;
4. With respect to all counts, granting Plaintiffs such other and further relief as may be appropriate.

DEMAND FOR JURY TRIAL

Plaintiffs demand a trial by jury on all matters so triable.

Dated: April 11, 2012

Respectfully Submitted,

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