

JS 44 (Rev. 12/07)

**CIVIL COVER SHEET**

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

**I. (a) PLAINTIFFS**

JETHRO PUGH, JR., et al.

(b) County of Residence of First Listed Plaintiff Dallas County  
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorney's (Firm Name, Address, and Telephone Number)

Gene Locks, Locks Law Firm, 601 Walnut Street, Suite 720 East,  
Philadelphia, PA 19106, (215) 893-0100

**DEFENDANTS**

NATIONAL FOOTBALL LEAGUE, et al.

County of Residence of First Listed Defendant New York County  
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE  
LAND INVOLVED.

Attorneys (If Known)

**II. BASIS OF JURISDICTION** (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☐ 2 U.S. Government Defendant
- ☐ 3 Federal Question (U.S. Government Not a Party)
- ☒ 4 Diversity (Indicate Citizenship of Parties in Item III)

**III. CITIZENSHIP OF PRINCIPAL PARTIES** (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- |   | PTF                                   | DEF                        |   | PTF                        | DEF                                   |
|---|---------------------------------------|----------------------------|---|----------------------------|---------------------------------------|
| Citizen of This State                   | <input type="checkbox"/> 1            | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State     | <input type="checkbox"/> 4 | <input type="checkbox"/> 4            |
| Citizen of Another State                | <input checked="" type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input checked="" type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3            | <input type="checkbox"/> 3 | Foreign Nation  | <input type="checkbox"/> 6 | <input type="checkbox"/> 6            |

**IV. NATURE OF SUIT** (Place an "X" in One Box Only)

CONTRACT	TORTS	EDUCATION/EMPLOYMENT	PROPERTY RIGHTS	LABOR	PROPERTY RIGHTS	LABOR	PROPERTY RIGHTS
<input type="checkbox"/> 110 Insurance	<input type="checkbox"/> 310 Airplane	<input type="checkbox"/> 610 Agriculture	<input type="checkbox"/> 422 Appeal 28 USC 158	<input type="checkbox"/> 710 Fair Labor Standards Act	<input type="checkbox"/> 820 Copyrights	<input type="checkbox"/> 861 HIA (1395ff)	<input type="checkbox"/> 400 State Reapportionment
<input type="checkbox"/> 120 Marine	<input type="checkbox"/> 315 Airplane Product Liability	<input type="checkbox"/> 620 Other Food & Drug	<input type="checkbox"/> 423 Withdrawal 28 USC 157	<input type="checkbox"/> 620 Other Food & Drug	<input type="checkbox"/> 830 Patent	<input type="checkbox"/> 862 Black Lung (923)	<input type="checkbox"/> 410 Antitrust
<input type="checkbox"/> 130 Miller Act	<input type="checkbox"/> 320 Assault, Libel & Slander	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881	<input type="checkbox"/> 840 Trademark	<input type="checkbox"/> 630 Liquor Laws	<input type="checkbox"/> 863 DIWC/DIWW (405(g))	<input type="checkbox"/> 864 SSID Title XVI	<input type="checkbox"/> 430 Banks and Banking
<input type="checkbox"/> 140 Negotiable Instrument	<input type="checkbox"/> 330 Federal Employers' Liability	<input type="checkbox"/> 640 R.R. & Truck	<input type="checkbox"/> 865 RSI (405(g))	<input type="checkbox"/> 650 Airline Regs.	<input type="checkbox"/> 866 RSI (405(g))	<input type="checkbox"/> 867 RSI (405(g))	<input type="checkbox"/> 450 Commerce
<input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment	<input type="checkbox"/> 340 Marine	<input type="checkbox"/> 660 Occupational Safety/Health	<input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant)	<input type="checkbox"/> 660 Occupational Safety/Health	<input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 872 Taxes (U.S. Plaintiff or Defendant)	<input type="checkbox"/> 460 Deportation
<input type="checkbox"/> 151 Medicare Act	<input type="checkbox"/> 345 Marine Product Liability	<input type="checkbox"/> 690 Other	<input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 720 Labor/Mgmt. Relations	<input type="checkbox"/> 872 Taxes (U.S. Plaintiff or Defendant)	<input type="checkbox"/> 873 Environmental Matters	<input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations
<input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans)	<input type="checkbox"/> 350 Motor Vehicle	<input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act	<input type="checkbox"/> 874 Environmental Matters	<input type="checkbox"/> 740 Railway Labor Act	<input type="checkbox"/> 875 Customer Challenge 12 USC 3410	<input type="checkbox"/> 876 Environmental Matters	<input type="checkbox"/> 480 Consumer Credit
<input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits	<input type="checkbox"/> 355 Motor Vehicle Product Liability	<input type="checkbox"/> 790 Other Labor Litigation	<input type="checkbox"/> 877 Environmental Matters	<input type="checkbox"/> 791 Empl. Ret. Inc. Security Act	<input type="checkbox"/> 878 Environmental Matters	<input type="checkbox"/> 879 Environmental Matters	<input type="checkbox"/> 490 Cable/Sat TV
<input type="checkbox"/> 160 Stockholders' Suits	<input checked="" type="checkbox"/> 360 Other Personal Injury	<input type="checkbox"/> 462 Naturalization Application	<input type="checkbox"/> 879 Environmental Matters	<input type="checkbox"/> 463 Habeas Corpus - Alien Detainee	<input type="checkbox"/> 880 Other Statutory Actions	<input type="checkbox"/> 881 Agricultural Acts	<input type="checkbox"/> 490 Cable/Sat TV
<input type="checkbox"/> 190 Other Contract	<input type="checkbox"/> 441 Voting	<input type="checkbox"/> 464 Other Immigration Actions	<input type="checkbox"/> 882 Economic Stabilization Act	<input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 883 Environmental Matters	<input type="checkbox"/> 884 Energy Allocation Act	<input type="checkbox"/> 810 Selective Service
<input type="checkbox"/> 195 Contract Product Liability	<input type="checkbox"/> 442 Employment		<input type="checkbox"/> 884 Energy Allocation Act		<input type="checkbox"/> 885 Environmental Matters	<input type="checkbox"/> 886 Environmental Matters	<input type="checkbox"/> 850 Securities/Commodities/Exchange
<input type="checkbox"/> 196 Franchise	<input type="checkbox"/> 443 Housing/Accommodations		<input type="checkbox"/> 886 Environmental Matters		<input type="checkbox"/> 887 Environmental Matters	<input type="checkbox"/> 888 Environmental Matters	<input type="checkbox"/> 875 Customer Challenge 12 USC 3410
<input type="checkbox"/> 210 Land Condemnation	<input type="checkbox"/> 444 Welfare		<input type="checkbox"/> 887 Environmental Matters		<input type="checkbox"/> 889 Environmental Matters	<input type="checkbox"/> 890 Other Statutory Actions	<input type="checkbox"/> 890 Other Statutory Actions
<input type="checkbox"/> 220 Foreclosure	<input type="checkbox"/> 445 Amer. w/Disabilities - Employment		<input type="checkbox"/> 888 Environmental Matters		<input type="checkbox"/> 891 Agricultural Acts	<input type="checkbox"/> 892 Economic Stabilization Act	<input type="checkbox"/> 891 Agricultural Acts
<input type="checkbox"/> 230 Rent Lease & Ejectment	<input type="checkbox"/> 446 Amer. w/Disabilities - Other		<input type="checkbox"/> 889 Environmental Matters		<input type="checkbox"/> 892 Economic Stabilization Act	<input type="checkbox"/> 893 Environmental Matters	<input type="checkbox"/> 892 Economic Stabilization Act
<input type="checkbox"/> 240 Torts to Land	<input type="checkbox"/> 440 Other Civil Rights		<input type="checkbox"/> 890 Other Statutory Actions		<input type="checkbox"/> 893 Environmental Matters	<input type="checkbox"/> 894 Energy Allocation Act	<input type="checkbox"/> 893 Environmental Matters
<input type="checkbox"/> 245 Tort Product Liability			<input type="checkbox"/> 891 Agricultural Acts		<input type="checkbox"/> 894 Energy Allocation Act	<input type="checkbox"/> 895 Freedom of Information Act	<input type="checkbox"/> 894 Energy Allocation Act
<input type="checkbox"/> 290 All Other Real Property			<input type="checkbox"/> 892 Economic Stabilization Act		<input type="checkbox"/> 895 Freedom of Information Act	<input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice	<input type="checkbox"/> 895 Freedom of Information Act
			<input type="checkbox"/> 893 Environmental Matters		<input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice	<input type="checkbox"/> 950 Constitutionality of State Statutes	<input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice

**V. ORIGIN**

(Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
- ☐ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from another district (specify)
- ☐ 6 Multidistrict Litigation
- ☐ 7 Appeal to District Judge from Magistrate Judgment

**VI. CAUSE OF ACTION**

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

28 U.S.C. 1332

Brief description of cause:  
Other Personal Injury**VII. REQUESTED IN COMPLAINT:**

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

DEMAND \$ in excess of \$5 million

CHECK YES only if demanded in complaint: JURY DEMAND: ☒ Yes ☐ No

**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE

Anita Brody

DOCKET NUMBER

12-cv-00262 and 12-cv-00324

DATE

03/05/2012

SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

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

**CASE MANAGEMENT TRACK DESIGNATION FORM**

Jethro Pugh, Jr., et al.

v.

National Football League, et al.

CIVIL ACTION

NO.

In accordance with the Civil Justice Expense and Delay Reduction Plan of this court, counsel for plaintiff shall complete a Case Management Track Designation Form in all civil cases at the time of filing the complaint and serve a copy on all defendants. (See § 1:03 of the plan set forth on the reverse side of this form.) In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a Case Management Track Designation Form specifying the track to which that defendant believes the case should be assigned.

**SELECT ONE OF THE FOLLOWING CASE MANAGEMENT TRACKS:**

- (a) Habeas Corpus – Cases brought under 28 U.S.C. § 2241 through § 2255. ( )
- (b) Social Security – Cases requesting review of a decision of the Secretary of Health and Human Services denying plaintiff Social Security Benefits. ( )
- (c) Arbitration – Cases required to be designated for arbitration under Local Civil Rule 53.2. ( )
- (d) Asbestos – Cases involving claims for personal injury or property damage from exposure to asbestos. ( )
- (e) Special Management – Cases that do not fall into tracks (a) through (d) that are commonly referred to as complex and that need special or intense management by the court. (See reverse side of this form for a detailed explanation of special management cases.) (xx)
- (f) Standard Management – Cases that do not fall into any one of the other tracks. ( )

03/05/2012

Date

Gene Locks, Esquire

Attorney-at-law

Plaintiffs

Attorney for

(215) 893-3434

Telephone

(215) 893-3444

FAX Number

glocks@lockslaw.com

E-Mail Address

## UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA — DESIGNATION FORM to be used by counsel to indicate the category of the case for the purpose of assignment to appropriate calendar.

Address of Plaintiff: 329 East Colorado Boulevard, Dallas, Texas

Address of Defendant: 345 Park Avenue, New York, New York 10017

Place of Accident, Incident or Transaction: \_\_\_\_\_  
(Use Reverse Side For Additional Space)

Does this civil action involve a nongovernmental corporate party with any parent corporation and any publicly held corporation owning 10% or more of its stock?

(Attach two copies of the Disclosure Statement Form in accordance with Fed.R.Civ.P. 7.1(a))

Yes ☐ No ☐

Does this case involve multidistrict litigation possibilities?

Yes ☐ No ☐

RELATED CASE, IF ANY: 12-cv-00324

Case Number: 12-cv-00262 Judge Anita Brody Date Terminated: \_\_\_\_\_

Civil cases are deemed related when yes is answered to any of the following questions:

1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court?  
Yes ☐ No ☒
2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court?  
Yes ☒ No ☐
3. Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action in this court?  
Yes ☐ No ☒
4. Is this case a second or successive habeas corpus, social security appeal, or pro se civil rights case filed by the same individual?  
Yes ☐ No ☒

CIVIL: (Place ☒ in ONE CATEGORY ONLY)

A. Federal Question Cases:

1. ☐ Indemnity Contract, Marine Contract, and All Other Contracts
2. ☐ FELA
3. ☐ Jones Act-Personal Injury
4. ☐ Antitrust
5. ☐ Patent
6. ☐ Labor-Management Relations
7. ☐ Civil Rights
8. ☐ Habeas Corpus
9. ☐ Securities Act(s) Cases
10. ☐ Social Security Review Cases
11. ☐ All other Federal Question Cases  
(Please specify)

B. Diversity Jurisdiction Cases:

1. ☐ Insurance Contract and Other Contracts
2. ☐ Airplane Personal Injury
3. ☐ Assault, Defamation
4. ☐ Marine Personal Injury
5. ☐ Motor Vehicle Personal Injury
6. ☐ Other Personal Injury (Please specify)
7. ☐ Products Liability
8. ☐ Products Liability — Asbestos
9. ☒ All other Diversity Cases  
(Please specify)

ARBITRATION CERTIFICATION

(Check Appropriate Category)

I, Gene Locks, counsel of record do hereby certify:

- ☐ Pursuant to Local Civil Rule 53.2, Section 3(c)(2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs;
- ☐ Relief other than monetary damages is sought.

DATE: 03/05/2012

Gene Locks

Attorney-at-Law

12969

Attorney I.D.#

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.

I certify that, to my knowledge, the within case is not related to any case now pending or within one year previously terminated action in this court except as noted above.

DATE: \_\_\_\_\_

Attorney-at-Law

Attorney I.D.#

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

JETHRO PUGH, JR.,  
ROGER BROWN, KAY BROWN,  
JAMES GRABOWSKI,  
KATHLEEN GRABOWSKI, CHARLIE WATERS,  
ROSIE WATERS, LUTHER BROUGHTON,  
KURT GOUVEIA, JULIE ANN GOUVEIA,  
MIKE HORAN, KIM HORAN,  
RONALD LOU, LING T. NGO LOU,  
JON ARNETT, JANE ARNETT,  
KURT BECKER, GLORIA BECKER,  
DON BEEBE, DIANA BEEBE,  
VAUGHN BROADNAX,  
JOSEPHINE BROADNAX,  
EDWARD BROWN, CYNTHIA BROWN,  
RANDALL WILLIAM BURKE,  
AMY MARIE BURKE, ANTHONY CLINE, SR.,  
MARVIN COBB, MARCUS COTTON,  
RUSSELL DAVIS, BRENDA DIANE DAVIS,  
ANTHONY DICKERSON,  
KIRK DODGE, TY DOUTHARD,  
IRVIN EATMAN, MAUREEN EATMAN,  
KENNETH ELLIS, JOYCE ELLIS,  
AUSTIN GONSOULIN, NICKIE GONSOULIN,  
DARRYL GRANT, THERESA GRANT,  
JESSIE GREEN, EDGAR HENKE,  
ROCELLE HENKE, MITCHELL JOHNSON,  
JANE FOX-JOHNSON, RANDALL KIRK,  
JOSEPH J. KRAKOSKI, RALPH KUREK,  
CONNIE KUREK, LE-LO LANG,  
MONICA LANG, GREGORY LARSON,  
JOSEFINE LARSON, BILL LEWIS,  
D.D. LEWIS, DIANE WALTERS LEWIS,  
LARRY LINNE, DEBORAH LINNE,  
GREG LLOYD, STEPHANIE LLOYD,  
TIM MANOA, DEVIRCE MANOA,  
ANTHONY MARTIN, KATHY MARTIN,  
GEORGE MCCULLOUGH, JR.,  
ROLAND MCDOLE, ANTOINETTE MCDOLE,  
DON MCNEAL, RHONDA MCNEAL,  
BRETT MILLER, EZEKIEL MOORE, JR.,  
CAROLYN MOORE, DAVE OSBORN,

CIVIL ACTION NO: \_\_\_\_\_

COMPLAINT

JURY TRIAL DEMANDED

BEVERLY OSBORN, FRANK PARKER,	:
CARLA PARKER, BRENT PARKINSON,	:
KIMBERLY PARKINSON,	:
RALPH PERRETTA, JOANNE PERRETTA,	:
CRAIG POWELL, CHRISTINE POWELL,	:
JOE PROFIT, WANDA PROFIT,	:
ERVIN RANDLE, BRIDGET RANDLE,	:
BUCKY RICHARDSON,	:
TRACEY RICHARDSON,	:
PAUL ROCHESTER, NANCY ROCHESTER,	:
DICK SCHAFRATH,	:
JUDITH RUSH, KEN SCHROY,	:
SUSAN SCHROY, ANDREW SELFRIDGE,	:
TIMOTHY SHERWIN, JANNICE SHERWIN,	:
DAVE SMITH, KATRINA WELCH-SMITH,	:
IRVIN SMITH, JAMES SUMMERS,	:
DIANE SCOTT SUMMERS, CHUCK THOMAS,	:
THOMAS TOTH, GAIL TOTH,	:
BILLY VAN HEUSEN, JAMES WILLIAMS,	:
MITCH WILLIS, CARI WILLIS,	:
EDDIE WILSON, NANCY WILSON	:
	:
PLAINTIFFS,	:
	:
v.	:
	:
NATIONAL FOOTBALL LEAGUE,	:
NFL PROPERTIES LLC, and	:
JOHN DOES 1 through 100, inclusive,	:
	:
	:
DEFENDANTS.	:

### **COMPLAINT**

The Plaintiffs set forth above in the case caption bring this Complaint and state as follows:

1. This action seeks a declaration of liability, injunctive relief, and financial compensation for the long-term chronic injuries, financial losses, expenses, and intangible losses

suffered by the Plaintiffs and their spouses as a result of the defendants' intentional tortious misconduct (by voluntary undertaking), negligence, fraud, and conspiracy.

2. This action arises from the pathological and debilitating effects of head injuries and concussions that have afflicted present and former professional football players in the National Football League (the "NFL"). For many decades, evidence has linked repetitive traumatic brain injury to long-term neurological problems in many sports. The NFL, as the organizer, marketer, and face of the most popular sport in the United States, in which head trauma is a regular occurrence, was aware of the evidence and the risks associated with repetitive traumatic brain injuries and concussions for decades, but deliberately ignored and actively concealed the information from the Plaintiffs and all others who participated in organized football at all levels.

3. Moreover, in or around 1994 and possibly earlier, the NFL voluntarily inserted itself into the scientific research and discussion concerning the relationship between concussions and short-term and long-term impairment of the brain. After doing so, the NFL then intentionally and fraudulently mislead present and former players, and all people who reasonably rely upon the NFL's expertise about its own sport, regarding the short-term and long-term risks posed by concussions and head trauma.

4. Rather than warn players that they risked permanent brain injury if they returned to play too soon after sustaining a concussion, the NFL actively deceived players, by misrepresenting to them that concussions did not present serious, life-altering risks.

5. The NFL, through its own initiative and voluntary undertaking, created the Mild Traumatic Brain Injury Committee (the "MTBI Committee") in 1994 to research and ameliorate the impact of concussions on NFL players. Notwithstanding this purported

purpose, and despite clear medical evidence that on-field concussions led directly to brain injuries with tragic results for players at every level of the sport, the NFL failed to inform its current and former players of the true risks associated with such head trauma and purposefully misrepresented and/or concealed medical evidence on that issue.

6. Athletes who suffered repetitive traumatic brain injuries and/or concussion in other professional sports were restricted from playing full games or even seasons, yet NFL players who had similar trauma were regularly returned to play.

7. The NFL's active and purposeful concealment and misrepresentation of the severe neurological risks of repetitive traumatic brain injury exposed players to dangers they could have avoided had the NFL provided them with truthful and accurate information. Many of these players have suffered brain damage and latent neurodegenerative disorders and diseases as a result of the NFL's acts and/or omissions.

### **JURISDICTION AND VENUE**

8. This Court has original jurisdiction pursuant to 28 U.S.C. § 1332(a)(1) and (b) and 28 U.S.C. § 1332(d)(11). All of the plaintiffs and all of the defendants are citizens of different states. The amount in controversy exceeds \$75,000, exclusive of interest and costs, for each Plaintiff. The amount in controversy for all Plaintiffs in this mass action exceeds five million dollars (\$5,000,000) exclusive of interest and costs. This matter can be tried jointly in that the Plaintiffs claims involve common questions of law and fact.

9. This Court has personal jurisdiction over the Defendants because they conduct substantial and continuous business in the Commonwealth of Pennsylvania.

10. Venue is proper in this district pursuant to 28 U.S.C. § 1391(a)(2) and (b)(2), because a substantial part of the events or omissions that give rise to the claims occurred within the

Commonwealth of Pennsylvania and this district, and the Defendants conduct a substantial part of their business within this district.

### **PARTIES**

11. Plaintiff Jethro Pugh, Jr. is 67 years old and a former NFL defensive lineman who resides in Dallas, Texas. Mr. Pugh played in the NFL from 1965 through 1978 for the Dallas Cowboys. During his NFL career, Mr. Pugh sustained repetitive traumatic impacts to his head and/or concussions on multiple occasions. Currently, Mr. Pugh suffers from various neurological conditions and symptoms related to the multiple head traumas.

12. Plaintiff Roger Brown is 74 years old and a former NFL defensive tackle who resides with his wife Kay Brown in Portsmouth, Virginia. Mr. Brown played in the NFL from 1960 through 1969 for the Detroit Lions and Los Angeles Rams. During his NFL career, Mr. Brown sustained repetitive traumatic impacts to his head and/or concussions on multiple occasions. Currently, Mr. Brown suffers from various neurological conditions and symptoms related to the multiple head traumas.

13. Plaintiff James Grabowski is 67 years old and a former NFL fullback who resides with his wife Kathleen Grabowski in Inverness, Illinois. Mr. Grabowski played in the NFL from 1966 through 1972 for the Green Bay Packers and Chicago Bears. During his NFL career, Mr. Grabowski sustained repetitive traumatic impacts to his head and/or concussions on multiple occasions. Currently, Mr. Grabowski suffers from various neurological conditions and symptoms related to the multiple head traumas.

14. Plaintiff Charlie Waters is 63 years old and a former NFL defensive back who resides with his wife Rosie Waters in Dallas, Texas. Mr. Waters played in the NFL from 1970 through 1982 for the Dallas Cowboys. During his NFL career, Mr. Waters sustained repetitive



traumatic impacts to his head and/or concussions on multiple occasions. Currently, Mr. Waters suffers from various neurological conditions and symptoms related to the multiple head traumas.

15. Plaintiff Luther Broughton is 37 years old and a former NFL tight end who resides in Charlotte, North Carolina. Mr. Broughton played in the NFL from 1997 through 2001 for the Philadelphia Eagles and Carolina Panthers. During his NFL career, Mr. Broughton sustained repetitive traumatic impacts to his head and/or concussions on multiple occasions. Currently, Mr. Broughton suffers from various neurological conditions and symptoms related to the multiple head traumas.

16. Plaintiff Kurt Gouveia is 47 years old and a former NFL linebacker who resides with his wife Julie Ann Gouveia in Mooresville, North Carolina. Mr. Gouveia played in the NFL from 1986 through 1998 for the Washington Redskins, Philadelphia Eagles, and San Diego Chargers. During his NFL career, Mr. Gouveia sustained repetitive traumatic impacts to his head and/or concussions on multiple occasions. Currently, Mr. Gouveia suffers from various neurological conditions and symptoms related to the multiple head traumas.

17. Plaintiff Mike Horan is 53 years old and a former NFL punter who resides with his wife Kim Horan in Orange, California. Mr. Horan played in the NFL from 1984 through 1999 for the Philadelphia Eagles, Denver Broncos, New York Giants, St. Louis Rams, and Chicago Bears. During his NFL career, Mr. Horan sustained repetitive traumatic impacts to his head and/or concussions on multiple occasions. Currently, Mr. Horan suffers from various neurological conditions and symptoms related to the multiple head traumas.

18. Plaintiff Ronald Lou is 60 years old and a former NFL center and special teams player who resides with his wife Ling T. Ngo Lou in Chandler, Arizona. Mr. Lou played in the NFL from 1973 through 1976 for the Houston Oilers and Philadelphia Eagles. During his NFL

career, Mr. Lou sustained repetitive traumatic impacts to his head and/or concussions on multiple occasions. Currently, Mr. Lou suffers from various neurological conditions and symptoms related to the multiple head traumas.

19. Plaintiff Jon Arnett is 76 years old and a former NFL running back who resides with his wife Jane Arnett in Lake Oswego, Oregon. Mr. Arnett played in the NFL from 1957 through 1966 for the Los Angeles Rams and Chicago Bears. During his NFL career, Mr. Arnett sustained repetitive traumatic impacts to his head and/or concussions on multiple occasions. Currently, Mr. Arnett suffers from various neurological conditions and symptoms related to the multiple head traumas.

20. Plaintiff Kurt Becker is 53 years old and a former NFL offensive lineman who resides with his wife Gloria Becker in Big Rock, Illinois. Mr. Becker played in the NFL from 1981 through 1991 for the Chicago Bears and Los Angeles Rams. During his NFL career, Mr. Becker sustained repetitive traumatic impacts to his head and/or concussions on multiple occasions. Currently, Mr. Becker suffers from various neurological conditions and symptoms related to the multiple head traumas.

21. Plaintiff Don Beebe is 47 years old and a former NFL wide receiver who resides with his wife Diana Beebe in Aurora, Illinois. Mr. Beebe played in the NFL from 1989 through 1997 for the Buffalo Bills, Carolina Panthers, and Green Bay Packers. During his NFL career, Mr. Beebe sustained repetitive traumatic impacts to his head and/or concussions on multiple occasions. Currently, Mr. Beebe suffers from various neurological conditions and symptoms related to the multiple head traumas.

22. Plaintiff Vaughn Broadnax is 49 years old and a former NFL fullback who resides with his wife Josephine Broadnax in Carmel, Indiana. Mr. Broadnax played in the NFL

in 1984 for the Tampa Bay Buccaneers. During his NFL career, Mr. Broadnax sustained repetitive traumatic impacts to his head and/or concussions on multiple occasions. Currently, Mr. Broadnax suffers from various neurological conditions and symptoms related to the multiple head traumas.

23. Plaintiff Edward Brown is 49 years old and a former NFL wide receiver who resides with his wife Cynthia Brown in Miami, Florida. Mr. Brown played in the NFL from 1985 through 1993 for the Cincinnati Bengals. During his NFL career, Mr. Brown sustained repetitive traumatic impacts to his head and/or concussions on multiple occasions. Currently, Mr. Brown suffers from various neurological conditions and symptoms related to the multiple head traumas.

24. Plaintiff Randall William Burke is 56 years old and a former NFL wide receiver and special teams player who resides with his wife Amy Marie Burke in Lexington, Kentucky. Mr. Burke played in the NFL from 1977 through 1981 for the Baltimore Colts. During his NFL career, Mr. Burke sustained repetitive traumatic impacts to his head and/or concussions on multiple occasions. Currently, Mr. Burke suffers from various neurological conditions and symptoms related to the multiple head traumas.

25. Plaintiff Anthony Cline, Sr. is 63 years old and a former NFL defensive end and linebacker who resides in Kingsland, Georgia. Mr. Cline played in the NFL from 1970 through 1978 for the Oakland Raiders and San Francisco 49ers. During his NFL career, Mr. Cline sustained repetitive traumatic impacts to his head and/or concussions on multiple occasions. Currently, Mr. Cline suffers from various neurological conditions and symptoms related to the multiple head traumas.

26. Plaintiff Marvin Cobb is 58 years old and a former NFL cornerback, free safety and strong safety who resides in Cincinnati, Ohio. Mr. Cobb played in the NFL from 1975 through 1980 for the Cincinnati Bengals, Pittsburgh Steelers, and Minnesota Vikings. During his NFL career, Mr. Cobb sustained repetitive traumatic impacts to his head and/or concussions on multiple occasions. Currently, Mr. Cobb suffers from various neurological conditions and symptoms related to the multiple head traumas.

27. Plaintiff Marcus Cotton is 45 years old and a former NFL outside linebacker who resides in Sacramento, California. Mr. Cotton played in the NFL from 1988 through 1992 for the Atlanta Falcons, Cleveland Browns, and Seattle Seahawks. During his NFL career, Mr. Cotton sustained repetitive traumatic impacts to his head and/or concussions on multiple occasions. Currently, Mr. Cotton suffers from various neurological conditions and symptoms related to the multiple head traumas.

28. Plaintiff Russell Davis is 55 years old and a former NFL fullback who resides with his wife Brenda Diane Davis in Jackson, Michigan. Mr. Davis played in the NFL from 1979 through 1984 for the Pittsburgh Steelers. During his NFL career, Mr. Davis sustained repetitive traumatic impacts to his head and/or concussions on multiple occasions. Currently, Mr. Davis suffers from various neurological conditions and symptoms related to the multiple head traumas.

29. Plaintiff Anthony Dickerson is 54 years old and a former NFL outside linebacker and special teams player who resides in Pearland, Texas. Mr. Dickerson played in the NFL from 1980 through 1986 for the Dallas Cowboys and Buffalo Bills. During his NFL career, Mr. Dickerson sustained repetitive traumatic impacts to his head and/or concussions on multiple

occasions. Currently, Mr. Dickerson suffers from various neurological conditions and symptoms related to the multiple head traumas.

30. Plaintiff Kirk Dodge is 49 years old and a former NFL middle linebacker and special teams player who resides in Aliso Viejo, California. Mr. Dodge played in the NFL from 1984 through 1987 for the Detroit Lions, Houston Oilers, and Denver Broncos. During his NFL career, Mr. Dodge sustained repetitive traumatic impacts to his head and/or concussions on multiple occasions. Currently, Mr. Dodge suffers from various neurological conditions and symptoms related to the multiple head traumas.

31. Plaintiff Ty Douthard is 38 years old and a former NFL running back and special teams player who resides in Tampa, Florida. Mr. Douthard played in the NFL from 1997 through 1998 for the Cincinnati Bengals. During his NFL career, Mr. Douthard sustained repetitive traumatic impacts to his head and/or concussions on multiple occasions. Currently, Mr. Douthard suffers from various neurological conditions and symptoms related to the multiple head traumas.

32. Plaintiff Irvin Eatman is 51 years old and a former NFL offensive tackle who resides with his wife Maureen Eatman in San Antonio, Texas. Mr. Eatman played in the NFL from 1986 through 1997 for the Kansas City Chiefs, New York Jets, Los Angeles Rams, Atlanta Falcons, Houston Oilers, and Tennessee Oilers. During his NFL career, Mr. Eatman sustained repetitive traumatic impacts to his head and/or concussions on multiple occasions. Currently, Mr. Eatman suffers from various neurological conditions and symptoms related to the multiple head traumas.

33. Plaintiff Kenneth Ellis is 64 years old and a former NFL defensive back who resides with his wife Joyce Ellis in Baker, Louisiana. Mr. Ellis played in the NFL from 1970 through

1979 for the Green Bay Packers, Houston Oilers, Miami Dolphins, Cleveland Browns, Detroit Lions, and Los Angeles Rams. During his NFL career, Mr. Ellis sustained repetitive traumatic impacts to his head and/or concussions on multiple occasions. Currently, Mr. Ellis suffers from various neurological conditions and symptoms related to the multiple head traumas.

34. Plaintiff Austin Gonsoulin is 73 years old and a former NFL safety who resides with his wife Nickie Gonsoulin in Beaumont, Texas. Mr. Gonsoulin played in the NFL from 1960 through 1967 for the Denver Broncos and San Francisco 49ers. During his NFL career, Mr. Gonsoulin sustained repetitive traumatic impacts to his head and/or concussions on multiple occasions. Currently, Mr. Gonsoulin suffers from various neurological conditions and symptoms related to the multiple head traumas.

35. Plaintiff Darryl Grant is 52 years old and a former NFL defensive tackle who resides with his wife Theresa Grant in Centreville, Virginia. Mr. Grant played in the NFL from 1981 through 1990 for the Washington Redskins. During his NFL career, Mr. Grant sustained repetitive traumatic impacts to his head and/or concussions on multiple occasions. Currently, Mr. Grant suffers from various neurological conditions and symptoms related to the multiple head traumas.

36. Plaintiff Jessie Green is 58 years old and a former NFL wide receiver and special teams player who resides in Mt. Pleasant, Texas. Mr. Green played in the NFL from 1976 through 1980 for the Green Bay Packers and Seattle Seahawks. During his NFL career, Mr. Green sustained repetitive traumatic impacts to his head and/or concussions on multiple occasions. Currently, Mr. Green suffers from various neurological conditions and symptoms related to the multiple head traumas.

37. Plaintiff Edgar Henke is 84 years old and a former NFL middle linebacker, inside linebacker, guard, tackle, defensive end, and special teams player who resides with his wife

Rocelle Henke in Auburn, California. Mr. Henke played in the NFL from 1951 through 1952 and 1956 through 1963 for the San Francisco 49ers and St. Louis Cardinals. During his NFL career, Mr. Henke sustained repetitive traumatic impacts to his head and/or concussions on multiple occasions. Currently, Mr. Henke suffers from various neurological conditions and symptoms related to the multiple head traumas.

38. Plaintiff Mitchell Johnson is 70 years old and a former NFL offensive tackle who resides with his wife Jane Fox-Johnson in Washington, District of Columbia. Mr. Johnson played in the NFL from 1965 through 1972 for the Dallas Cowboys, Washington Redskins, Los Angeles Rams, and Cleveland Browns. During his NFL career, Mr. Johnson sustained repetitive traumatic impacts to his head and/or concussions on multiple occasions. Currently, Mr. Johnson suffers from various neurological conditions and symptoms related to the multiple head traumas.

39. Plaintiff Randall Kirk is 67 years old and a former NFL linebacker and special teams player who resides in Morgan Hill, California. Mr. Kirk played in the NFL from 1987 through 1999 for the New York Giants, San Diego Chargers, Phoenix Cardinals, Washington Redskins, Cleveland Browns, Cincinnati Bengals, Arizona Cardinals, and San Francisco 49ers. During his NFL career, Mr. Kirk sustained repetitive traumatic impacts to his head and/or concussions on multiple occasions. Currently, Mr. Kirk suffers from various neurological conditions and symptoms related to the multiple head traumas.

40. Plaintiff Joseph J. Krakoski is 49 years old and a former NFL linebacker and special teams player who resides in Reston, Virginia. Mr. Krakoski played in the NFL from 1985 through 1986 for the Houston Oilers and Washington Redskins. During his NFL career, Mr. Krakoski sustained repetitive traumatic impacts to his head and/or concussions on multiple

occasions. Currently, Mr. Krakoski suffers from various neurological conditions and symptoms related to the multiple head traumas.

41. Plaintiff Ralph Kurek is 68 years old and a former NFL running back and special teams player who resides with his wife Connie Kurek in South Royalton, Vermont. Mr. Kurek played in the NFL from 1965 through 1970 for the Chicago Bears. During his NFL career, Mr. Kurek sustained repetitive traumatic impacts to his head and/or concussions on multiple occasions. Currently, Mr. Kurek suffers from various neurological conditions and symptoms related to the multiple head traumas.

42. Plaintiff Le-Lo Lang is 45 years old and a former NFL cornerback who resides with his wife Monica Lang in Aurora, Colorado. Mr. Lang played in the NFL from 1990 through 1995 for the Denver Broncos and Seattle Seahawks. During his NFL career, Mr. Lang sustained repetitive traumatic impacts to his head and/or concussions on multiple occasions. Currently, Mr. Lang suffers from various neurological conditions and symptoms related to the multiple head traumas.

43. Plaintiff Gregory Larson is 72 years old and a former NFL tackle, guard and center who resides with his wife Josepine Larson in Nisswa, Minnesota. Mr. Larson played in the NFL from 1961 through 1973 for the New York Giants. During his NFL career, Mr. Larson sustained repetitive traumatic impacts to his head and/or concussions on multiple occasions. Currently, Mr. Larson suffers from various neurological conditions and symptoms related to the multiple head traumas.

44. Plaintiff Bill Lewis is 48 years old and a former NFL guard and center who resides in Tempe, Arizona. Mr. Lewis played in the NFL from 1986 through 1993 for the Los Angeles Raiders, Phoenix Cardinals, and New England Patriots. During his NFL career, Mr. Lewis



sustained repetitive traumatic impacts to his head and/or concussions on multiple occasions.

Currently, Mr. Lewis suffers from various neurological conditions and symptoms related to the multiple head traumas.

45. Plaintiff D.D. Lewis is 66 years old and a former NFL linebacker and special teams player who resides with his wife Diane Walters Lewis in Plano, Texas. Mr. Lewis played in the NFL from 1968 through 1981 for the Dallas Cowboys. During his NFL career, Mr. Lewis sustained repetitive traumatic impacts to his head and/or concussions on multiple occasions. Currently, Mr. Lewis suffers from various neurological conditions and symptoms related to the multiple head traumas.

46. Plaintiff Larry Linne is 49 years old and a former NFL wide receiver and special teams player who resides with his wife Deborah Linne in Windsor, Colorado. Mr. Linne played in the NFL from 1986 through 1988 for the New England Patriots, Dallas Cowboys, and San Diego Chargers. During his NFL career, Mr. Linne sustained repetitive traumatic impacts to his head and/or concussions on multiple occasions. Currently, Mr. Linne suffers from various neurological conditions and symptoms related to the multiple head traumas.

47. Plaintiff Greg Lloyd is 46 years old and a former NFL outside linebacker and special teams player who resides with his wife Stephanie Lloyd in Stockbridge, Georgia. Mr. Lloyd played in the NFL from 1987 through 1999 for the Pittsburgh Steelers and Carolina Panthers. During his NFL career, Mr. Lloyd sustained repetitive traumatic impacts to his head and/or concussions on multiple occasions. Currently, Mr. Lloyd suffers from various neurological conditions and symptoms related to the multiple head traumas.

48. Plaintiff Tim Manoa is 47 years old and a former NFL fullback who resides with his wife Devirce Manoa in East Palo Alto, California. Mr. Manoa played in the NFL from 1987

through 1991 for the Cleveland Browns, New Orleans Saints, and Indianapolis Colts. During his NFL career, Mr. Manoa sustained repetitive traumatic impacts to his head and/or concussions on multiple occasions. Currently, Mr. Manoa suffers from various neurological conditions and symptoms related to the multiple head traumas.

49. Plaintiff Anthony Martin is 63 years old and a former NFL linebacker who resides with his wife Kathy Martin in Louisville, Kentucky. Mr. Martin played in the NFL from 1972 through 1977 for the Minnesota Vikings and Seattle Seahawks. During his NFL career, Mr. Martin sustained repetitive traumatic impacts to his head and/or concussions on multiple occasions. Currently, Mr. Martin suffers from various neurological conditions and symptoms related to the multiple head traumas.

50. Plaintiff George McCullough, Jr. is 37 years old and a former NFL defensive back and special teams player who resides in Houston, Texas. Mr. McCullough played in the NFL from 1997 through 2002 for the Tennessee Titans, Kansas City Chiefs, and San Francisco 49ers. During his NFL career, Mr. McCullough sustained repetitive traumatic impacts to his head and/or concussions on multiple occasions. Currently, Mr. McCullough suffers from various neurological conditions and symptoms related to the multiple head traumas.

51. Plaintiff Roland McDole is 72 years old and a former NFL offensive tackle and defensive end who resides with his wife Antoinette McDole in Middletown, Virginia. Mr. McDole played in the NFL from 1961 through 1978 for the St. Louis Cardinals, Houston Oilers, Buffalo Bills, and Washington Redskins. During his NFL career, Mr. McDole sustained repetitive traumatic impacts to his head and/or concussions on multiple occasions. Currently, Mr. McDole suffers from various neurological conditions and symptoms related to the multiple head traumas.

52. Plaintiff Don McNeal is 53 years old and a former NFL defensive back who resides with his wife Rhonda McNeal in Coral Gables, Florida. Mr. McNeal played in the NFL from 1980 through 1989 for the Miami Dolphins. During his NFL career, Mr. McNeal sustained repetitive traumatic impacts to his head and/or concussions on multiple occasions. Currently, Mr. McNeal suffers from various neurological conditions and symptoms related to the multiple head traumas.

53. Plaintiff Brett Miller is 53 years old and a former NFL offensive tackle who resides in Redondo Beach, California. Mr. Miller played in the NFL from 1983 through 1992 for the Atlanta Falcons, San Diego Chargers, and New York Jets. During his NFL career, Mr. Miller sustained repetitive traumatic impacts to his head and/or concussions on multiple occasions. Currently, Mr. Miller suffers from various neurological conditions and symptoms related to the multiple head traumas.

54. Plaintiff Ezekiel Moore, Jr. is 68 years old and a former NFL defensive back who resides with his wife Carolyn Moore in Houston, Texas. Mr. Moore played in the NFL from 1967 through 1978 for the Houston Oilers. During his NFL career, Mr. Moore sustained repetitive traumatic impacts to his head and/or concussions on multiple occasions. Currently, Mr. Moore suffers from various neurological conditions and symptoms related to the multiple head traumas.

55. Plaintiff Dave Osborn is 68 years old and a former NFL running back who resides with his wife Beverly Osborn in Lakeville, Minnesota. Mr. Osborn played in the NFL from 1965 through 1976 for the Minnesota Vikings and Green Bay Packers. During his NFL career, Mr. Osborn sustained repetitive traumatic impacts to his head and/or concussions on multiple occasions. Currently, Mr. Osborn suffers from various neurological conditions and symptoms related to the multiple head traumas.

56. Plaintiff Frank Parker is 72 years old and a former NFL defensive tackle who resides with his wife Carla Parker in Broken Bow, Oklahoma. Mr. Parker played in the NFL from 1962 through 1968 for the Cleveland Browns, Pittsburgh Steelers, and New York Giants. During his NFL career, Mr. Parker sustained repetitive traumatic impacts to his head and/or concussions on multiple occasions. Currently, Mr. Parker suffers from various neurological conditions and symptoms related to the multiple head traumas.

57. Plaintiff Brent Parkinson is 44 years old and a former NFL offensive lineman who resides with his wife Kimberly Parkinson in Valencia, Virginia. Mr. Parkinson played in the NFL from 1990 through 1991 for the Denver Broncos. During his NFL career, Mr. Parkinson sustained repetitive traumatic impacts to his head and/or concussions on multiple occasions. Currently, Mr. Parkinson suffers from various neurological conditions and symptoms related to the multiple head traumas.

58. Plaintiff Ralph Perretta is 59 years old and a former NFL offensive lineman who resides with his wife Joanne Perretta in Encinitas, California. Mr. Perretta played in the NFL from 1975 through 1980 for the San Diego Chargers and New York Giants. During his NFL career, Mr. Perretta sustained repetitive traumatic impacts to his head and/or concussions on multiple occasions. Currently, Mr. Perretta suffers from various neurological conditions and symptoms related to the multiple head traumas.

59. Plaintiff Craig Powell is 40 years old and a former NFL outside linebacker and special teams player who resides with his wife Christine Powell in Edmonton, Alberta, Canada. Mr. Profit played in the NFL from 1995 through 1998 for the Cleveland Browns, Baltimore Ravens, and New York Jets. During his NFL career, Mr. Profit sustained repetitive traumatic impacts to his

head and/or concussions on multiple occasions. Currently, Mr. Profit suffers from various neurological conditions and symptoms related to the multiple head traumas.

60. Plaintiff Joe Profit is 62 years old and a former NFL tailback who resides with his wife Wanda Profit in Marietta, Georgia. Mr. Profit played in the NFL from 1971 through 1974 for the Atlanta Falcons and New Orleans Saints. During his NFL career, Mr. Profit sustained repetitive traumatic impacts to his head and/or concussions on multiple occasions. Currently, Mr. Profit suffers from various neurological conditions and symptoms related to the multiple head traumas.

61. Plaintiff Ervin Randle is 49 years old and a former NFL middle linebacker who resides with his wife Bridget Randle in Grapevine, Texas. Mr. Randle played in the NFL from 1985 through 1992 for the Tampa Bay Buccaneers and Kansas City Chiefs. During his NFL career, Mr. Randle sustained repetitive traumatic impacts to his head and/or concussions on multiple occasions. Currently, Mr. Randle suffers from various neurological conditions and symptoms related to the multiple head traumas.

62. Plaintiff Bucky Richardson is 43 years old and a former NFL quarterback and special teams player who resides with his wife Tracey Richardson in Missouri City, Texas. Mr. Richardson played in the NFL from 1992 through 1994 for the Houston Oilers. During his NFL career, Mr. Richardson sustained repetitive traumatic impacts to his head and/or concussions on multiple occasions. Currently, Mr. Richardson suffers from various neurological conditions and symptoms related to the multiple head traumas.

63. Plaintiff Paul Rochester is 73 years old and a former NFL defensive tackle and nose guard who resides with his wife Nancy Rochester in Jacksonville, Florida. Mr. Rochester played in the NFL from 1960 through 1969 for the Dallas Texans, Kansas City Chiefs, and New

York Jets. During his NFL career, Mr. Rochester sustained repetitive traumatic impacts to his head and/or concussions on multiple occasions. Currently, Mr. Rochester suffers from various neurological conditions and symptoms related to the multiple head traumas.

64. Plaintiff Dick Schafrath is 74 years old and a former NFL defensive end and offensive tackle who resides with his wife Judith Rush in Mansfield, Ohio. Mr. Schafrath played in the NFL from 1959 through 1971 for the Cleveland Browns. During his NFL career, Mr. Schafrath sustained repetitive traumatic impacts to his head and/or concussions on multiple occasions. Currently, Mr. Schafrath suffers from various neurological conditions and symptoms related to the multiple head traumas.

65. Plaintiff Ken Schroy is 59 years old and a former NFL strong safety and special teams player who resides with his wife Susan Schroy in Garden City, New York. Mr. Schroy played in the NFL from 1976 through 1985 for the New York Jets. During his NFL career, Mr. Schroy sustained repetitive traumatic impacts to his head and/or concussions on multiple occasions. Currently, Mr. Schroy suffers from various neurological conditions and symptoms related to the multiple head traumas.

66. Plaintiff Andrew Selfridge is 63 years old and a former NFL outside linebacker and special teams player who resides in Keswick, Virginia. Mr. Selfridge played in the NFL from 1972 through 1979 for the San Diego Chargers, Buffalo Bills, New York Giants, Miami Dolphins, and San Francisco 49ers. During his NFL career, Mr. Selfridge sustained repetitive traumatic impacts to his head and/or concussions on multiple occasions. Currently, Mr. Selfridge suffers from various neurological conditions and symptoms related to the multiple head traumas.

67. Plaintiff Timothy Sherwin is 53 years old and a former NFL tight end and special teams player who resides with his wife Jannice Sherwin in Latham, New York. Mr. Sherwin

played in the NFL from 1981 through 1988 for the Baltimore Colts, Indianapolis Colts and New York Giants. During his NFL career, Mr. Sherwin sustained repetitive traumatic impacts to his head and/or concussions on multiple occasions. Currently, Mr. Sherwin suffers from various neurological conditions and symptoms related to the multiple head traumas.

68. Plaintiff Dave Smith is 64 years old and a former NFL wide receiver who resides with his wife Katrina Welch-Smith in Falls Church, Virginia. Mr. Smith played in the NFL from 1970 through 1974 for the Pittsburgh Steelers, Houston Oilers, and Kansas City Chiefs. During his NFL career, Mr. Smith sustained repetitive traumatic impacts to his head and/or concussions on multiple occasions. Currently, Mr. Smith suffers from various neurological conditions and symptoms related to the multiple head traumas.

69. Plaintiff Irvin Smith is 40 years old and a former NFL tight end who resides in Phoenix, Arizona. Mr. Smith played in the NFL from 1993 through 2000 for the New Orleans Saints, San Francisco 49ers, Cleveland Browns, and Washington Redskins. During his NFL career, Mr. Smith sustained repetitive traumatic impacts to his head and/or concussions on multiple occasions. Currently, Mr. Smith suffers from various neurological conditions and symptoms related to the multiple head traumas.

70. Plaintiff James Summers is 66 years old and a former NFL cornerback who resides with his wife Diane Scott Summers in Benicia, California. Mr. Summers played in the NFL in 1967 for the Denver Broncos. During his NFL career, Mr. Summers sustained repetitive traumatic impacts to his head and/or concussions on multiple occasions. Currently, Mr. Summers suffers from various neurological conditions and symptoms related to the multiple head traumas.

71. Plaintiff Chuck Thomas is 51 years old and a former NFL guard, center, and special teams player who resides in Las Vegas, Nevada. Mr. Thomas played in the NFL from 1986

through 1992 for the Atlanta Falcons and San Francisco 49ers. During his NFL career, Mr. Thomas sustained repetitive traumatic impacts to his head and/or concussions on multiple occasions. Currently, Mr. Thomas suffers from various neurological conditions and symptoms related to the multiple head traumas.

72. Plaintiff Thomas Toth is 49 years old and a former NFL guard and tackle who resides with his wife Gail Toth in Orland Park, Illinois. Mr. Toth played in the NFL from 1985 through 1991 for the New England Patriots, Miami Dolphins, and San Diego Chargers. During his NFL career, Mr. Toth sustained repetitive traumatic impacts to his head and/or concussions on multiple occasions. Currently, Mr. Toth suffers from various neurological conditions and symptoms related to the multiple head traumas.

73. Plaintiff Billy Van Heusen is 65 years old and a former NFL wide receiver and punter who resides in Denver, Colorado. Mr. Van Heusen played in the NFL from 1968 through 1976 for the Denver Broncos. During his NFL career, Mr. Van Heusen sustained repetitive traumatic impacts to his head and/or concussions on multiple occasions. Currently, Mr. Van Heusen suffers from various neurological conditions and symptoms related to the multiple head traumas.

74. Plaintiff James Williams is 33 years old and a former NFL wide receiver and special teams player who resides in Grandprairie, Texas. Mr. Williams played in the NFL from 2000 through 2005 for the Seattle Seahawks and Detroit Lions. During his NFL career, Mr. Williams sustained repetitive traumatic impacts to his head and/or concussions on multiple occasions. Currently, Mr. Williams suffers from various neurological conditions and symptoms related to the multiple head traumas.

75. Plaintiff Mitch Willis is 49 years old and a former NFL defensive lineman who resides with his wife Cari Willis in Mansfield, Texas. Mr. Will Willis played in the NFL from



1984 through 1990 for the Los Angeles Raiders, Atlanta Falcons, Indianapolis Colts, and Dallas Cowboys. During his NFL career, Mr. Willis sustained repetitive traumatic impacts to his head and/or concussions on multiple occasions. Currently, Mr. Willis suffers from various neurological conditions and symptoms related to the multiple head traumas.

76. Plaintiff Eddie Wilson is 71 years old and a former NFL quarterback and punter who resides with his wife Nancy Wilson in Goodyear, Arizona. Mr. Wilson played in the NFL from 1962 through 1967 for the Dallas Texans, Kansas City Chiefs, Boston Patriots, and Miami Dolphins. During his NFL career, Mr. Wilson sustained repetitive traumatic impacts to his head and/or concussions on multiple occasions. Currently, Mr. Wilson suffers from various neurological conditions and symptoms related to the multiple head traumas.

77. The names and capacities of Defendants DOES 1 through 100, inclusive whether individual, corporate, associate or otherwise, are unknown to Plaintiffs at the present time. When Plaintiffs ascertain the names and capacities of those Defendants, they will seek leave of court to amend this complaint.

78. All Defendants, and each of them, were in some fashion legally responsible for the injuries and damages complained of herein.

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

80. Defendant NFL, which maintains its offices at 345 Park Avenue, New York, NY 10017, is an unincorporated association consisting of the 32 separately owned and independently-operated professional football teams listed below. The NFL is engaged in interstate commerce in the business of, among other things, promoting, operating, organizing,

and regulating the major professional football league in the United States. The NFL is not, and has not, been the employer of the Plaintiffs, who were employed during their respective careers in professional football by the independent clubs (hereinafter “Teams” or “Clubs”) set forth below. The United States Supreme Court held in *American Needle, Inc. v. NFL*, 130 S. Ct. 2201, 2212-13 (2010) that each team that is a member of the NFL is a legally distinct and separate entity from both the other teams and the NFL itself.

81. The 32 separately owned and independently-operated teams are:

<b>NFL Team Owner</b>	<b>State of Organization</b>	<b>Team Name (City)</b>
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, Inc.	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