IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MINNESOTA

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NATIONAL FOOTBALL LEAGUE PLAYERS ASSOCIATION, on its own behalf and on behalf of ADRIAN PETERSON,

Case No. 14-cv-4990 (DSD/JSM)

Petitioner,

AFFIDAVIT OF BARBARA PODLUCKY BERENS

-V.-

NATIONAL FOOTBALL LEAGUE, NATIONAL FOOTBALL LEAGUE MANAGEMENT COUNCIL, and ROGER GOODELL

Respondents.

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STATE OF MINNESOTA)

) SS

COUNTY OF HENNEPIN)

Barbara Podlucky Berens, being first duly sworn, states as follows:

1. I am a partner in the law firm of Berens & Miller, P.A., one of the law firms representing petitioner in the above-captioned matter. I make this Affidavit upon my own personal knowledge and in support of the Motion to Hold the NFL in Civil Contempt brought by the National Football League Players Association ("NFLPA").

- 2. Attached as Exhibit 1 hereto is a true and correct copy of the NFL's December 2014 Personal Conduct Policy (the "New Policy").
- 3. Attached as Exhibit 2 hereto is a true and correct copy of the NFL's Previous Personal Conduct Policy (the "Previous Policy").
- 4. Attached as Exhibit 3 hereto is a true and correct copy of the March 3, 2015 Letter from Jeffrey Kessler to Harold Henderson regarding Adrian Peterson's appeal of his indefinite suspension under the NFL's Collective Bargaining Agreement (the "Peterson Arbitration").
- 5. Attached as Exhibit 4 hereto is a true and correct copy of the March 4, 2015 Letter from Daniel Nash to Harold Henderson regarding the Peterson Arbitration.
- 6. Attached as Exhibit 5 hereto is a true and correct copy of the March 5, 2015 Letter from Jeffrey Kessler to Harold Henderson regarding the Peterson Arbitration.
- 7. Attached as Exhibit 6 hereto is a true and correct copy of the March 6, 2015 Email from Harold Henderson to Jeffrey Kessler and Daniel Nash and additional correspondence regarding the Peterson Arbitration.
- 8. Attached as Exhibit 7 hereto is a true and correct copy of the March 9, 2015 Letter from Daniel Nash to Harold Henderson regarding the Peterson Arbitration.
- 9. Attached as Exhibit 8 hereto is a true and correct copy of the March 9, 2015 Letter from Jeffrey Kessler to Harold Henderson regarding the Peterson Arbitration.
- 10. Attached as Exhibit 9 hereto is a true and correct copy of the March 16, 2015 Email from David Greenspan to Harold Henderson and additional correspondence regarding the Peterson Arbitration.

11. Attached as Exhibit 10 hereto is a true and correct copy of the March 17,

2015 Email from Daniel Nash to Harold Henderson and additional correspondence

regarding the Peterson Arbitration.

12. Attached as Exhibit 11 hereto is a true and correct copy of the May 13, 2015

Letter from Daniel Nash to Harold Henderson regarding Greg Hardy's Article 46 Appeal

Hearing.

13. Attached as Exhibit 12 hereto is a true and correct copy of the April 22, 2015

Letter from Roger Goodell to Greg Hardy imposing a ten-game suspension on Mr. Hardy

as a result of alleged conduct that occurred in May 2014.

14. Attached as Exhibit 13 hereto is a true and correct copy of the NFL's August

2014 Personal Conduct Policy.

FURTHER YOUR AFFIANT SAYETH NOT.

s/Barbara Podlucky Berens

Barbara Podlucky Berens, #209788 BERENS & MILLER, P.A.

DEKENS & MILLER, I.A

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612-349-6171

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Subscribed and sworn to before me this 19th of May, 2015.

s/Nicole Ann McCormick

Notary Public

My Commission Expires Jan 31, 2020

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