

JEFF PASH

THE MODERATOR: Good afternoon everyone. Jeff Pash is with us. For those of you who do not know how to spell Pash, it's P-A-S-H. He's one of our executive vice presidents, and he's also our chief in-house counsel so he is an attorney and worked very closely on the Clarett litigation.

Jeff will have a brief comment and then we will take your questions. Jeff

JEFF PASH: Good afternoon everyone. As I'm sure everyone knows, earlier today Judge Scheindlin of the Federal Court here in Manhattan made a lengthy ruling in favor of Maurice Clarett in his lawsuit against the NFL challenging our eligibility rule. In the course of her opinion, the Judge rejected our principle legal defenses that we had advanced in support of the rule and held that it did not satisfy the requirement to be protected under the collective bargaining or labor commission to the antitrust laws and she ordered that in Clarett be eligible for the 2004 draft and that there was no sound basis on which to preclude him or players in a similar situation from being eligible for the draft.

I think, although it's a lengthy opinion, 71 pages long, I think that's a fair summary of the bottom line. So I think probably I'll stop now and we can go ahead and take any questions.

Q. Yes, Jeff, two parts. On what basis do you expect to appeal and can you expect any kind of restraining order during the process that will preclude players such as Clarett from getting drafted in April?

JEFF PASH: Let me take the second one first. We would need to, I believe, under the Federal Court rules, I believe we need to ask the trial court, Judge Scheindlin's court, in the first instance, of her order. If she were to turn us down, then we could ask the Court of Appeals in advance of actually taking a formal appeal in the case, and that's something we're looking at. We're thinking about whether to do that, and if so, what the correct way to proceed would be, and I think we'll work that all out in the next couple of days.

With respect to basis of an appeal, this is an issue that the labor exemption to the antitrust laws that has been litigated many, many times over the years, moving forward to the Brown case which

addressed the labor laws which we litigated up through the Supreme Court to a favorable decision in 1996, and there have been a number of similar cases, that have been litigated by other leagues, basketball and hockey, for example, and I think the focus of our appeal would be on that issue, mainly that the eligibility rule is protected by the bargaining player's association, and that it was legally erroneous for the Judge to hold that it was not the product of collective bargaining and was not, therefore, covered by the labor exemption. And we've had quite a few instances over time, including the Brown case, including original Marvin Powell case, where trial courts have ruled in favor of these issues. We've taken the issues up on appeal and the appeals court and in Brown's case, the Supreme Court have ultimately agreed. So we do think it's a very strong appellate position and one we're very comfortable.

Q. Yes. As far as the appeal goes, how long do you think you have for NFL this coming year and you'll have no other choice than to let him be in the draft?

JEFF PASH: Well, I think it's unlikely that we would get a decision from the appeals court between now and the draft. I can't absolutely rule that out, but just in the ordinary course, the appellant process takes, you know, a number of months longer than we have between now and, you know, the latter part of April. And if there's not a stay, as I mentioned before in response to Don's question, if there's not a stay, then yes, you're correct, Mr. Clarett would be eligible to be drafted in April.

Q. Mr. Pash, whether you decide to seek the stay could you expect to be required to post a bond to indemnify Mr. Clarett in case the draft and in favor of the appellant court?

JEFF PASH: I would doubt it. Well, I'm going to explain. Generally, a bond is posted where there's some meaningful question about a defendant's ability to pay any judgment, and I don't think there's any serious question about that here. We've had cases before, as I mentioned, where we have had rulings go against us at the trial court level and have taken them up on appeal and we have not had to post bond in those cases. And I think the ruling and the rationale of the judges relied on in those circumstances would be

...when all is said, we're done®

applicable here as well, so I would not expect to have to post a bond.

Q. Yes, Mr. Pash if you don't get granted a stay and Mr. Clarett is allowed into the draft like you answered in the last question, would there be any form of retaliation against him where teams will not pick him or do you think he will be treated like any other player coming into the draft if you can't get a stay on appeal?

JEFF PASH: I have not the slightest doubt that he would be treated like any other player and there would not be any retaliation whatsoever. I know how competitive the teams are, and they will draft the best player available, and if he can play, he'll be out on the field every weekend.

Q. Jeff, when you look at this ruling does it appear to you that this now applies to everyone, every player in the college ranks and maybe even below, and does the league now have to look at the possibility of this ruling of giving people another deadline to apply for the coming draft, people who were before ineligible?

JEFF PASH: In respect to the second part of the question, I think clearly that's the case. I mean, we need to -- in order to be faithful to the ruling, we need to say to players, not necessarily Maurice Clarett, who indicated he wanted to be in the draft but other players, in light of the ruling there will be a new opportunity to apply to the draft within some reasonable period of time so we know what our draft pool is like and would like to have an opportunity. We'll treat the Court's ruling with due diligence. They'll need medical tests, workouts and so we definitely will have to do that.

We're working on identifying what the right set of procedures is, and I expect we'll have some guidance on that to give to the clubs within the next day or so.

With respect to the first part of your question, I think, Mark, that is probably how we do feel. It doesn't appear that the Judge believes that there is any bright line that we can draw that says that the players on one side of the line are eligible and on the other side of the line ineligible so that, for the moment, is a fair interpretation in how we are looking at it?

Q. Jeff, at the very least, couldn't this loophole be corrected or closed at the next

reopening of the collective bargaining agreement in, I believe, it's 2008?

JEFF PASH: Well, hopefully before that, Tony. I do think that that's something that we are going to look hard at, and, you know, our view is that it was collectively bargained. It was collectively bargained back in 1993. We're quite confident of that position. It was accepted by the union on two or three subsequent occasions where we extended the collective bargaining in '93 when it was about to expire four or five years ago, and it's been extended on several occasions since without changing this rule. Certainly everybody inside the pro football knew about that so we think there is a very substantial record that we can submit to court of appeals.

Now, if the Court of Appeals should ultimately agree with Judge Scheindlin, then I think we would have to look at trying to amend the collective bargaining.

Q. Is it as simple as putting language in the CBA?

JEFF PASH: Well, I think you'd have to wait and get some guidance from the appeals court. As I say, we think right now it is there and that's the position that we're going to advance in the appeals court. If the Court of Appeals disagrees with us, then, obviously, we have to look hard at what the court has to say and try to respond in an appropriate and responsible way at that time.

Q. Jeff, I'm curious, why you have the labor discussion because I'm under the impression that it's not addressed in the CBA specifically and also the issue of, you know, you have a monopoly on pro football. You're, in effect, denying people a right to make living when you're the only vehicle to make a living and isn't it arbitrary to say three years out of college instead of two? And also the issue of the elapsed years rather than the straight three years claiming than what the rule states. Could you address all of those issues?

JEFF PASH: I don't know if we have enough minutes on a conference call to go through all those. Let me take them in turn as best I can, and we'll just pull me up short if I overlook something.

The Collective Bargaining Agreement is not just a single document. Any collective bargaining agreement in any industry involves a series of agreements, some of which are denominated collective bargaining agreements.

...when all is said, we're done®

Some work rules -- some of which in our business are known as the NFL constitution and bylaws which is where the rule is contained and the constitution bylaws is something the union specifically bargained over in '93, and we had to, as part of the bargaining agreement, deliver to the union a full set of the constitution and bylaw's provision that we intended to maintain after the bargaining agreement took effect, and the union had the opportunity to bargain specifically over any part of the constitution or bylaws that it didn't agree with or contrary to the provisions of the CBA. So to say that it's not in the CBA really focuses on, you know, one frame of a movie and doesn't look at the overall set of employment principles that the union and the NFL have agreed upon to govern their relationship and working with us.

There's a lot of law that imports that position, and it's one that, as I said before, that we're quite comfortable with in terms of advancing at the appeals court level. With respect to whether it's arbitrary two or three years, I don't think so. I think it's a reason judgment. I think you want to talk to people who are knowledgeable about professional football, which may not necessarily be lawyers, personnel people, coaches, general managers, people who's jobs depend getting the right talent into the team at the right time, I think they would tell you without probably without any difference of opinion among them that this kind of a rule is sound and sensible and makes for a better game both here and at the college level.

With respect to denying people the right to work, at most you have to wait another year, and the reality is, and you know the statistics, people who go to college have longer careers, have more lucrative careers, have more successful careers than players who don't. The union says that fair statistics have been out there for years. No one's rebutted them. At the Super Bowl, one of the interesting things that came out is that if you look at the three teams in NFL that have the highest number of college graduates on their team, it just happens to be Carolina, Indianapolis and New England. So there is some correlation between finishing college, maximizing your college experience in the classroom and on the football field in the success of a player. So far from denying people the right to make a living, this rule, if anything, gives them an opportunity to give them a better living.

Q. Jeff, if I'm reading this right, in the next few days any number of high school sophomores can be drafted.

JEFF PASH: I think that's a fair reading, and if we read the opinion, that does seem to be the case. They'll have to apply. They'll have to go through a formal process, but they wouldn't be excluded just because of their status as a freshman player or sophomore.

Q. Even if you ultimately prevail in all this, the fact that Maurice looks like he's going to be in the Draft, does this break if they ultimately can prevail?

JEFF PASH: Well, I don't think so necessarily. I think it really depends on where the case ends up after the appeals court. You know, district courts are courts of first impression. They hear cases, sometimes on a very hurried-up cases, without development of a factual record and people read precedents differently and so that's why there are appeals court. So as I say, you can go back in our circumstances the most recent instance was with the practice squad case in Washington D.C. Where the district court issued a rule against us on every single issue that came before it. I don't think there was a single issue of consequence in question which we prevailed, and we had a big damage which goes to the question of a bond. And we took the case up to the Court of Appeals which ruled in our favor. Then the case went up to the Supreme Court which ruled in our favor. They're not for anybody if the Court of Appeals sides with us here, that's where we would be with this matter.

Q. Yeah, I'd like to get back before you could cure the problem, that if you had to cure the problem, you would do it by renegotiating. But didn't Judge Scheindlin say in addition to whether or not this CBA actually ended in this rule and in addition to whether or not this is part of the CBA process. She said that these were not the subjects of mandatory bargaining and you can't have this exemption apply with an entire group. It applies to a people who are not in the draft at all. So if that's the case, how could you cure the problem by renegotiating the CBA if the decision is not reversed?

JEFF PASH: Well, that's why I say the CBA -- you're quite correct in how you've read the opinion. That's why I say the questions of renegotiation that would have to await a ruling by the appeals court. You would not go forward and try to base on this opinion, and that's why I say we need to go to the Court of Appeals. We need to present some points to the Court of Appeals, get the benefit of their judgment, and then we can

...when all is said, we're done®

assess what we can appropriately in the collective bargaining agreement. As I said, I don't personally believe that's necessary. I think that the record's quite supportive that this was collectively bargained but certainly in light of some of the points, it would not make sense to revise before you got the decision from court.

Q. Jeff, I was just curious at the dynamics of the appeal. When would you expect to do something like that and will this affect the combine in some way? Are you going to have to invite more players? When will you have some kind of framework for this year?

JEFF PASH: Well, on the combine, that sort of runs separately from the league office, but our understanding is that the directors of the Combine are prepared to invite Mr. Clarett to participate in the Combine, and I don't think the appeal -- given that the combine is about ten days from now, I don't think the appeal would have any effect one way or another on the Combine. We'll go forward with the combine, and there may be a few more or different players there, but that will proceed separately.

In terms of the timing of the appeal, I think we will file our paper noting our intention to take an appeal fairly soon, and then the timing is generally set by the appellate court clerk's office, and they may speed it up or not depending on what their case load is like and what other issues they have before them. So that's something that's not entirely in our control, but we'll certainly proceed quickly as the rules permit.

Q. Jeff, would you address Larry Fitzgerald? Does this ruling affect him or have you already made a decision on his eligibility?

JEFF PASH: Larry Fitzgerald has asked to be declared eligible, and we had been in touch with an attorney representing him and asked for some further information which we were going to evaluate once we received it and try to make a judgment on it. Obviously, in light of this ruling, that may or may not be -- that may be an academic exercise, but certainly we're going to take a look at what his situation is, and we'll have something to say on the status of him fairly soon. He was not part of this litigation. He was not a plaintiff in this case. It was just Mr. Clarett so the ruling, you know, he's not a part of the ruling in this a formal way, but obviously, as we discussed, it's to any players other than just Clarett.

Q. Jeff, I have a two-pronged question. Has Mr. Clarett officially asked to be placed on the draft eligibility, and, two, is there anything to preclude him from tomorrow morning setting up private workouts?

JEFF PASH: On the second, I really would have to defer to the people in our player personnel department because we have some rulings concerning when our club can attend private workout and how that relates to the Combine and Draft and things like that, and I'm not conversing with him in that I would want to give you a definitive answer on that point. So between now and the combine, I don't know if he would set up private workouts or not. I would think not, but there are people here better to answer that question than me. On the first question, if I understand, are you saying is he officially on eligibility list?

Q. Yes.

JEFF PASH: He has asked to be included in the draft and the Judge specifically ordered that he be declared eligible for the draft and so unless there is a stay he will be eligible for the draft.

Q. As you understand, his college eligibility now is gone?

JEFF PASH: Well, I don't know. That's an issue between him and the NCAA and Ohio State. As today indicates we sometimes have enough difficulty dealing with our own eligibility much less anyone else's.

Q. Do you intend to definitely seek the stay, and if so, when do you plan to do that?

JEFF PASH: I don't know the answer to that if we're going to definitely seek a stay or not. That's something that we're talking with our counsel about, our litigation counsel, and I think our problem, we would be law library tonight, and we don't want to make a premature judgment. It's not something we have to take now. We'll certainly make a decision on that because if we are going to seek a stay, we need to move promptly and we know that we're just hoping that we'll make a decision within the next week.

Q. Okay. If I can follow up on that, what happens if you either decide not to seek a stay or you aren't granted a stay and that Maurice enters the draft and is chosen and a year from now the appeals court rules in your favor. Is Maurice there to stay? Does this stay

...when all is said, we're done®

affect anyone coming after him? What happens?

JEFF PASH: Well, the one thing we don't do is pull him off the team. Once he's in the draft, if he's selected, Maurice Clarett is selected or any other player who comes in on the basis of this ruling is drafted and signs a contract, he's in the NFL and we wish him well. We wish him all the success in the world once he's in and a subsequent reversal of this opinion would not affect status of a pro player.

Q. Jeff, with respect to Larry Fitzgerald, you said that you were waiting for or trying to get some information from his attorney. Do you have all the information that you need and it's a matter of you making a ruling number one? And number two, if you were to win your appeal could Larry Fitzgerald-- is that a separate issue? Could he still be included in the draft?

JEFF PASH: The focus of our inquiry was on whether, you know, Mr. Fitzgerald would be eligible under the rule. You know that we were defending in the Clarett case, and I don't, as I sit here right now, know if we have got even answers to each of the questions, that I would have to talk to some of the people in our player personnel department who are following up on that, but I suspect that we either have the information or will have it very shortly and be able to make a ruling on it, you know, in a relatively short period of time. I don't think we're looking at a lengthy time.

Q. Jeff, how surprised were you by today's ruling?

JEFF PASH: I was pretty surprised. There's such a substantial body of law, particularly here in the New York Federal Court, in support of sports leagues on these labor exemption issues whether it's cases involves the NFL or cases involving NBA. I was really surprised, yes.

Q. Can you just sum up why the NFL is so opposed to having early draft, and, two, has it been determined what recourse what one of these players might have if he's passed over in the draft in regard to NCAA eligibility?

JEFF PASH: In the second one, that is not an issue for us. It is an issue their school and NCAA would have, and they would have to resolve that. I believe a few years ago there was a case; I believe he was from Notre Dame, who entered the draft. I believe he was not drafted. He tried to go back to Notre Dame. He was told that he had no

eligibility. He sued the NCAA to get it back, and the Federal Court rejected the lawsuit and upheld the decision.

With respect to your first question, we take the position we do for a lot of reasons. One is, as I said before, it's perfectly clear, and decades of experience show this, that players who stay in school are better players. They have longer careers. They have more lucrative careers. They play better, and it's a benefit to the player, and it's a benefit to the NFL and benefit to the people. The people hurt most by the ruling are not NFL clubs, whether they're juniors, seniors, sophomores, and we will be able to coach them to play the NFL game. We'll be able to send them to NFL Europe if that's a way they need. People who will be hurt are players who, for one reason or another, try to make the jump from college to the NFL, and they'll lose their only opportunity at a college education because they'll lose the college, and they'll lose their opportunity to play in the NFL as an NFL quality player. We will not be the ultimate losers here. It's not a good thing for us, but there are other people who will be affected more and in a more adverse way.

Q. Jeff, I guess I wanted to know, first of all, are you saying that there is a real possibility that there could be a real influx of underclassmen into this year's draft and if so, you know, what the is NFL doing to prepare for it and what are the potential adverse league drafts if that happens?

JEFF PASH: I don't know if there will be an influx. I don't know how many players there will be applying who weren't eligible before. I think, you know, we'll have a better idea on that in a couple of weeks. In terms of the impact, I mean, the thing to remember is no matter how many players apply for the draft, there's only a limited number of drafts. The number is six in the collective bargaining agreement, so if you have 246 or something like that in an NFL draft and there are 246 players, then everybody plays. If 520 come, then 260 don't get to play as a result of this. So in terms of who comes into the NFL, it's going to be the same number of players, same number of draft picks, same roster size, same players, the salary cap stays in place. There's no more money and there's no more roster positions as a result of this lawsuit. It's just a question of distributing them differently.

Q. If there's bigger, higher slots in the draft will it have a competitive advantage for

...when all is said, we're done®

years to come?

JEFF PASH: I wouldn't think so because that changes year by year and the purpose of a draft is to force the best talent to the teams that are weaker. So if there are more good players in the drafts a result of this ruling, that would mean more good players for people to select if more players come out or get a college education. That would be a real negative as a result of the pool.

Q. Jeff, with regard to Clarett's complaint, did he have a claim in there where he was seeking monetary damages as a result for not being eligible for '03 Draft and was that ruled on? And my second question, what was the league's reasoning fighting his desire to be eligible for this rather than just grant him a one-time exemption; therefore, not opening a flood gate?

JEFF PASH: On question of damage, yes, he did claim damage for the 2003 season. That was not ruled on. I think that is a rather weak claim because he never sought to enter the draft last year and indeed was quoted publicly that he had no interest in coming into the NFL, so I think that claim is in the complaint, but I don't see there being a substantial basis for that claim going forward in light of Mr. Clarett's conduct.

In terms of your second question, why not just let him come in, what would have been the basis on which to let Maurice Clarett come in, make a special exception for him as opposed to anybody else? There has to be a basis to distinguish, and we, frankly, couldn't identify one in this case, and we had meetings with Mr. Clarett's attorneys, and there was no basis for exemption, and we felt it was an important part of principle. It was one which owner, general manager, coaches, also felt very strongly. It was also we knew the college felt very strongly, and so we thought it was the right thing to do, particularly since, as I said earlier, this is not an outcome and properly part of our collective bargaining arrangement and would not be overruled in a case like this. So that's the answer.

Q. If I could just follow up briefly, is it your answer if you are not granted a stay and lose appeal that the league and union would not be able to set any restriction on a player entering the draft? In other words, would you be able to try to alter your position in eligibility in a way that a certain number of college credits or some other requirement other than player's age?

JEFF PASH: Well, again, I think we're well down the road from that. We have a ways to go to get to that. I don't believe, and this is a point Ron brought up earlier, I don't believe the court's opinion are likely to withstand scrutiny. To my understanding they're directly prior rulings here in New York federal appeals and other courts, so I don't really think we'll get to that point, but, as I said, I think it would be really premature for us to talk about changing the collective bargaining agreement in some way before the appeals court has a chance to consider and address some of the legal issues because only really at that point do you have, I think, guidance that would be fully reliable and that would form a basis for making changes.

Q. What is the time frame normally, if it's possible to describe, on stays and how long it takes and why would you not file a stay in this situation?

JEFF PASH: Well, the time frame is generally quite prompt. I mean, state motions get ruled on an expedited basis so I think if you file for a stay, you could expect to get a pretty quick ruling, and I think the question of whether you do or don't is one, as I say, you make after you do a couple of things. One is have a chance to really sit down and thoroughly digest the court's opinion which was 71 pages long. It was lengthy and addresses a lot of issues, and do your homework on what's required to have a successful stay motion which differs from court to court. In other words, in the second circuit here in New York and the 5th circuit down in Texas and in California has still another. So you need to tailor your arguments and to the requirement of the particular court. And if we go in for a stay motion, we would want to make sure that we did it in a way that would give us the best of success and we made the best arguments. So even though it's something ruled on promptly, it's not something you want to do without making sure you've done it right.

Q. But quickly, is the surprise that you have said with the ruling along with some of the other successful appeals in New York, you would. I mean maybe it's too much to presume that that would, then you would think, because of this, would it be fair to say there's a good chance?

JEFF PASH: Well, I think there's a good chance that you ultimately have the ruling reversed. The standards that apply to stays on the

...when all is said, we're done®

one hand and the standards that apply to reverses or ruling and argument and things like that are different, so I'm confident that where we end up at the appeals process, and I agree with you that there is a lot of legal precedents, especially here in New York, that this ruling is not consistent with governing law and labor exemption issues and that might well go in favor of a stay if we apply for one. I hope you're on our panel.

Q. In light of today's ruling and the fact that you have not ruled within the Larry Fitzgerald case, is the big fear that the Clarett may take from Fitzgerald if you rule negatively in his case?

JEFF PASH: I don't think, no. I wouldn't say we're fearful of it. I think we're realistic as to what the ruling means and how the most likely applies, and I don't expect it will be litigated with Fitzgerald.

Q. Jeff, as you know, the scouting process for teams is exhausting. One, it consumes a lot of time and resources. If you guys lose the appeal, is there any provision for teams increasing coaches or scouting size or is that basically each team's decision?

JEFF PASH: Yes. I think each team's discretion just as it is in terms today how they organize. It's a little bit like Damon, if you roll the clock back ten years when we first had the free agent as a result of collect bargaining, that really caused clubs to change their scouting organization and focus heavily on veteran NFL players, so it would be something that the club would have to adjust to.

Q. And if I can follow up, you talked about the potential losers in the situation, and you mentioned the college athlete that comes out and loses the eligibility. What kind of strain do you see this having on the relationship in the league and the NCAA itself, I mean, as a primary system, programs will be hurt as well?

JEFF PASH: Well, I do think it's possible that some programs will be hurt, and that's an impact that I think, you know, needs to be accounted for by any court that's reviewing today's ruling. In terms of our relationship with the NCAA, I haven't talked with anyone about this, but I would like to think the NCAA would recognize that rather than trying to come up with some reason to let Maurice Clarett in on some special basis we recognized there was important principle and we did litigate it and take the risk and we will pursue

the case in ultimately what we expect to be a successful conclusion and that we are doing everything we can in pursuing all of our level avenues to preserve this eligibility rule for college football and players.

Q. I have two questions. First of all, if this ruling stands, what's your feeling about the NFL's legal ability to require players who may not meet that eligibility requirement to play overseas in Europe? Could that be an option? And second, I know Judge Doty has been helpful in the past. Could he or could he not be involved in the appeals process here or is it because where it's filed as to whether or not he would be the Judge on an appeal?

JEFF PASH: Yes. On the second point, you're right that Judge Doty, because he's based in Minnesota, he wouldn't hear at least this appeal which will have to be brought to the second circuit Court of Appeals here in New York. It's possible that at some point down the road, depending on what develops, this may become or some element of it may become a collective bargaining administration or supervision question and it might get to Judge Doty, but with respect to this litigation, the plaintiff is entitled to choose, and so the litigation will proceed here in New York on the first part.

About NFL Europe in terms of veteran players, players under contract in the NFL, there is a right, within the contract, to have those players play NFL Europe and so teams are sent to Europe to get experience and give opportunity to get additional playing and that might be certainly one thing that might happen if a lot of younger college players come in and could a player who didn't make it in the NFL go NFL Europe, sure. That's possible. There's there's a number of free agents that get signed.

Q. I guess I'm wondering if you can have a blanket rule to say player under two or three years out of high school as it applies here, could that, in fact, be used to draw a line and you require those players to play in Europe before they got to the big leagues?

JEFF PASH: Yeah. I don't like the old saying never say never, but today's not the day for setting blanket rule, and I would not be all that confident that a rule like that would work.

Q. Jeff, with the opportunity for college sophomores, college freshman, maybe even high school seniors declare for the draft, is the

...when all is said, we're done®

league afraid that some teams play actively go scout high school or freshman? Would they frown upon that?

JEFF PASH: Well, I think the teams are motivated to find the best players that are available to them. I don't expect our teams, as a matter of course, to go out and actively entice high school players to come into the NFL. I think that's pretty unrealistic. In most cases, I think they'll concentrate much more on the players who, you know, are known to them through college and that'll continue to be their focus. I think in terms of, you know, scouting, you also have to be mindful that it's not simply an NFL issue. The colleges have some fairly detailed properties that they could establish with respect who's allowed to be on campus and films made available. I don't know that the high school would do that. If they felt influx on high school campus, it's not.

Q. You know, I think one of the more surprising things we've heard here not just Maurice Clarett going in but a flood gate. Is there any cause at all that you could get a stay that would allow Maurice Clarett in the draft but hold off everyone else from jumping in?

JEFF PASH: Well, first of all, I don't know that the flood gates are open. I think that we really have to wait and see what number of players apply for the draft, what number of players, you know, are considered serious candidates to be drafted based on skill level. So it's fair to say the ruling is broad in its language. I think we have to wait and see.

In terms of asking for a stay that doesn't apply to Maurice Clarett but does everybody else, I would think this would be a little problematic because any judge, I think, would be properly reluctant to adjudicate to determine the rights of someone who's not in the courtroom, so to next instance, it's okay to let Maurice Clarett, Judge, but we wanted you to stop Jeff Pash and Damon Hack and everybody else. The Judge might well say, well, none of those people are in my courtroom and I'm not going to make any rulings that could affect them without hearing from them so I think it's an interesting and creative thought, but I'm not sure a judge will be prepared to go down that path. Thank you everybody; we appreciate your time.

...when all is said, we're done®