

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

IN RE: NATIONAL FOOTBALL LEAGUE
PLAYERS' CONCUSSION INJURY
LITIGATION

Case No. 2:12-md-02323-AB

MDL No. 2323

The Honorable Anita B. Brody

Kevin Turner and Shawn Wooden, on behalf of
themselves and others similarly situated,

Plaintiffs,

v.

National Football League and NFL Properties
LLC, successor-in-interest to NFL Properties,
Inc.,

Defendants.

THIS DOCUMENT RELATES TO: ALL
ACTIONS

**REPLY IN SUPPORT OF
MOTION OF WALKER PRESTON CAPITAL HOLDINGS, LLC
TO INTERVENE FOR THE LIMITED PURPOSE OF OPPOSING
ON JURISDICTIONAL GROUNDS CO-LEAD CLASS COUNSEL'S MOTION
TO (1) DIRECT CLAIMS ADMINISTRATOR TO WITHHOLD ANY PORTIONS
OF CLASS MEMBER MONETARY AWARDS PURPORTEDLY OWED TO CERTAIN
THIRD-PARTY LENDERS AND CLAIMS SERVICES PROVIDERS, AND (2) DIRECT
DISCLOSURE TO CLAIMS ADMINISTRATOR OF EXISTENCE OF CLASS
MEMBER AGREEMENTS WITH ALL THIRD PARTIES (ECF NO. 8470)**

Proposed Intervenor, Walker Preston Capital Holdings, LLC ("Walker Preston") moved, pursuant to Federal Rule of Civil Procedure 24(a), to intervene in this matter for the limited purpose of opposing on jurisdictional grounds co-lead class counsel's motion (ECF No. 8470) which sought, in part, an Order directing the Claims Administrator to withhold any portions of class member monetary awards purportedly owed by class members to certain third-party lenders

(including funders and so-called asset purchasers) and claims services providers (the “Motion to Withhold Funds”). (See ECF 8932).

The deadline for co-lead class counsel to oppose Walker Preston’s Motion to Intervene has passed, and co-lead class counsel did not file an opposition. Further, in co-lead class counsel’s reply in support of its Motion to Withhold Funds, co-lead class counsel noted that it would “not address the intervention motions, but rather, only those respondents’ [Walker Preston, Cash4Cases, and Atlas] underlying substantive responses.” (ECF 9113 at 2 n.1). Further, in light of this Court’s December 8, 2017 Order (ECF 9517), which could affect Walker Preston’s rights, it is important that Walker Preston’s status as an intervenor is resolved.

Accordingly, because Walker Preston’s Motion to Intervene was unopposed, and for the reasons set forth in Walker Preston’s opening motion and memorandum of law, Walker Preston respectfully requests (1) this Court grant Walker Preston’s motion to intervene for the limited purpose of challenging co-lead class counsel’s motion on jurisdictional grounds and (2) treat Walker Preston’s proposed response to the Motion to Withhold Funds as filed on November 16, 2017.

Dated: December 11, 2017

Respectfully submitted,

By: s/ Lee M. Epstein

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