

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

IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION

No. 2:18-md-02323-AB
MDL No. 2323

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

No. 2:12-md-02323-AB
MDL No. 2323

Plaintiffs,

v.

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

Defendants.

THIS DOCUMENT RELATES TO:
ALL ACTIONS

**DECLARATION OF STEVEN F. MOLO
RESPONSIVE TO THE COURT'S ORDER DATED MARCH 28, 2018**

I, Steven F. Molo, declare, pursuant to 28 U.S.C. § 1746:

1. I submit this declaration pursuant to the Court's Order of March 28, 2018 (Dkt. 9833). If called upon, I would testify as follows:

2. I am one of the founding partners of MoloLamken LLP.

3. My firm, along with William Hanglely of Hanglely Aronchick Segal Pudlin & Schiller and Linda Mullenix, represented seven class members for purposes of evaluating the proposed settlement and, ultimately, filing an objection to the settlement. *See* Dkt. 6082. Those seven class members were: Sean Morey, Alan Faneca, Sean Considine, Roderick "Rock" Cartwright, Jeff Rohrer, Robert Royall, and Ben Hamilton.

4. After the objection was filed, four of those class members – Morey, Hamilton, Cartwright, and Royal – chose to opt-out.

5. Cartwright and Royal, however, ultimately revoked their opt-outs, and rejoined Faneca, Considine, and Rohrer as members of the settlement class. Thus, of our seven original clients, five remain class members today.

6. Because the scope of our engagement was limited to evaluating the settlement and filing an objection if necessary, we do not currently represent any class member in connection with the settlement.

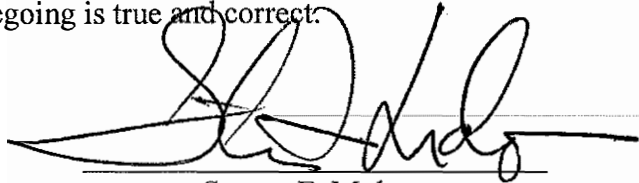
7. None of the class members that we previously represented has applied for or received a Monetary Award. None of the class members that we previously represented has been informed that he is entitled to receive a Monetary Award. None of the class members that we previously represented currently believes that he is eligible to receive a Monetary Award.

8. None of the class members that we previously represented has entered into an agreement to assign his rights to a Monetary Award. Neither myself, my firm, nor any attorney associated with my firm has any obligation to pay or forward any portion of a class member's Monetary Award to a third-party litigation funder. I have not had any role in creating, promoting, or facilitating any such assignment, and neither has any attorney at my firm.

9. I do not have any documents responsive to the requests in the Court's March 28, 2018 Order (Dkt. 9833).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: May 1, 2018
In New York, New York



Steven F. Molo

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Declaration of Steven F. Molo was filed electronically with the Clerk of Court using the CM/ECF System on May 1, 2018. The CM/ECF System will serve all counsel of record.

/s/ Steven F. Molo