

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF ERIE**

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CAITLIN FERRARI, on Behalf of Herself and :
All Others Similarly Situated, :

Plaintiff, :

v. :

STEPHANIE MATECZUN, CITADEL :
BROADCASTING COMPANY, CITADEL :
COMMUNICATIONS COMPANY, LTD., and :
BUFFALO BILLS, INC., :

Defendants. :

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STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

ROGER GOODELL, being duly sworn, deposes and says:

1. I am the Commissioner of the National Football League (“NFL”). I respectfully submit this affidavit in support of the motion to quash the subpoena, issued by plaintiff Caitlin Ferrari (“Plaintiff”) and dated July 3, 2014, and for a protective order. I am fully familiar with the facts contained herein.

2. The NFL is an unincorporated 501(c)(6) association of separately owned professional football Clubs. As Commissioner, I am the NFL’s chief executive officer.

3. I have no knowledge regarding: (i) the selection, training, compensation and/or pay practices of the Buffalo Jills; (ii) the terms and conditions under which the Buffalo Jills provide their services, or the setting of those terms and conditions; (iii) the management of the Buffalo Jills; (iv) how the Buffalo Jills acquire any uniforms or equipment; or (v) the travel and lodging expenses of the Buffalo Jills.

4. I do not know Caitlin Ferrari, the plaintiff in the above action.

The foregoing is true and correct to the best of my knowledge.

Dated: July 24, 2014


Roger Goodell

Sworn to before me this
24th day of July 2014


Notary Public

