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BUSINESS TRIAL GROUP

— Contingency-Fee Litigation —

20 North Orange Avenue, Suite 1600
Orlando, Florida 32801

January 31, 2025

Via E-mail and E-Portal

admin@collegeathletecompensation.com

<https://ecf.cand.uscourts.gov>

Ronald V. Dellums Federal Building & United States Courthouse
c/o Class Action Clerk
1301 Clay Street
Oakland, CA 94612

FILED

FEB 06 2025 *cy*

CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

Re: In re: College Athlete NIL Litigation, Case No. 4:20-cv-03919);
THOMAS G. TOWNSEND Claim #10114206701 PIN Code: 1526

To whom it may concern,

I represent Thomas Townsend. I am writing to object to the settlement on the issue of the amount allocated to Tommy from the settlement. This objection applies just to the allocation to Tommy Townsend.

Tommy's estimated total settlement payment is \$86,382.73 per the estimate available on the class action website.

Tommy's objection includes, but is not limited to:

- 1) Tommy's allocation estimate does not provide the calculation of his allocation sufficiently for a determination of accuracy.
- 2) The allocation estimate states that the allocation was based upon "information we received from your school", but Tommy has not been provided with the information which is required to make such a determination that "[i]f you believe the information we have is inaccurate, you can submit additional documentation..."
- 3) Tommy has learned that players at the University of Florida who played less, with fewer snaps, and over fewer seasons have received estimates which are significantly higher than his estimate. According to legal analysis in the media, "[b]ased on estimates provided by attorneys for the plaintiffs, the average payouts will be \$135,000 for those men's football...Exact payouts — which are based on a formula developed by University of San Francisco professor Daniel Rascher, an expert in the economics of college sports — would depend on the school attended, with athletes who played on teams at colleges that brought in higher revenues resulting in a bigger check. The amount athletes played or competed also counts. For football, that's measured in snaps."

Tommy was a multi-year starter for the University of Florida Gators, which enjoyed some of the highest revenues in the nation. Further, Tommy received numerous awards, both in the SEC and nationally, was a Ray Guy Award semi-finalist, multiple record holder with a significant social media profile, SEC Honor Roll, and was signed by the Kansas City Chiefs

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with whom Tommy won two Super Bowls-which should have been considered for a greater allocation. No explanation or documentary support has been provided for the disparate allocation provided for Tommy.

- 4) On behalf of Tommy, I submitted questions about his estimated allocation as directed to admin@collegeathletecompensation.com. We have not received a response as of the date of this letter.
- 5) Tommy states that he and his undersigned lawyer would like to speak at the Final Approval Hearing.

Tommy greatly appreciates the work of class counsel and the Court to render justice for him and his fellow athletes. However, Tommy must register this objection by the deadline to protect his rights, and to reserve his right to receive required information.

Tommy submits this objection without prejudice and reserves all rights and remedies.

Thank you for your consideration in this matter. Should you require any additional information, please feel free to have your Judicial Assistant contact me at my email address or at 807-719-9866.

Respectfully submitted,


Clay M. Townsend, Esq.

CMT/shc

Clay Townsend

[MORGAN & MORGAN]

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Case 4:20-cv-03919-CW

20 North Orange Ave.
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