

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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 BRIAN FLORES, STEVE WILKS and RAY :
 HORTON, as Class Representatives, on behalf of :
 themselves and all others similarly situated, :
 :
 Plaintiffs, :
 :
 v. :
 :
 THE NATIONAL FOOTBALL LEAGUE; NEW :
 YORK FOOTBALL GIANTS, INC. d/b/a NEW :
 YORK GIANTS; MIAMI DOLPHINS, LTD. :
 d/b/a MIAMI DOLPHINS; DENVER BRONCOS :
 FOOTBALL CLUB d/b/a DENVER BRONCOS; :
 HOUSTON NFL HOLDINGS, L.P. d/b/a :
 HOUSTON TEXANS; ARIZONA CARDINALS :
 FOOTBALL CLUB LLC d/b/a ARIZONA :
 CARDINALS; TENNESSEE TITANS :
 ENTERTAINMENT, INC. d/b/a TENNESSEE :
 TITANS and JOHN DOE TEAMS 1 through 26, :
 :
 Defendants. :
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Civil Action No.: 22-cv-00871 (VEC)

PLEASE TAKE NOTICE that upon the accompanying memorandum of law and other supporting documents, Plaintiffs Brian Flores, Steve Wilks and Ray Horton will move this Court, at the United States District Court, Southern District of New York, located at 40 Foley Square, New York, NY 10007, before the Honorable Valerie E. Caproni, to respectfully request an order reconsidering aspects of the Court’s order dated March 1, 2023 compelling arbitration of certain claims.

Dated: September 16, 2025
New York, New York

Respectfully submitted,

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- and -

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