

October 27, 2014

HAND DELIVERED

Richard Hennessey, Registrar
Social Justice Tribunals Ontario
Human Rights Tribunal of Ontario
655 Bay St, 14th Fl.
Toronto ON M7A 2A3

Dear Mr. Hennessey:

**Re: Abby Wambach and Players on National Teams Participating in the FIFA Women's World Cup Canada 2015 v. CSA and FIFA
Tribunal File 2014-18923-I**

Since the application's filing, respondents have engaged in unlawful reprisal threats under the Human Rights Code. The attached requests seek to amend the application and to secure an interim order enjoining these reprisals.

As a result of the reprisal threats, three players have requested removal from the list of applicants. With this submission, we ask that the Tribunal remove Teresa Noyola of Mexico and Camille Abily and Élise Bussaglia of France from the group of applicants seeking relief. Ms. Noyola, Ms. Abily and Ms. Bussaglia reserve the right to rejoin the applicants once the reprisal threats end.

While the reprisal threats are reprehensible and actionable, they have thankfully backfired in terms of reducing the total number of named players in this action. As three have withdrawn, we are now able to list at least 60 current individual applicants. *See* Schedule B to Form 1 (Amended) for the latest list of players.

In this submission to the Tribunal, we include the amended application forms, Form 10 requesting leave to amend, Form 16 requesting interim relief, and Form 23 verifying delivery.

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along with supporting materials. We also respectfully request an "initial conference call" similar to that described in Rules 46-49 as soon as is possible, in order to discuss 1) the reprisals and 2) setting a timeline that provides adequate time for a remedy.

Yours truly,



David Wright

Encls.

cc: Hampton Dellinger, via email
Catherine Gleason-Mercier, via email
Joseph Arvay, via email
J rome Valcke, FIFA, via email and mail

HUMAN RIGHTS TRIBUNAL OF ONTARIO

B E T W E E N:

**ABBY WAMBACH AND PLAYERS ON NATIONAL TEAMS PARTICIPATING IN THE FIFA
WOMEN'S WORLD CUP CANADA 2015,**

Applicants

v.

**CANADIAN SOCCER ASSOCIATION ("CSA") and
FÉDÉRATION INTERNATIONALE DE FOOTBALL ASSOCIATION ("FIFA")**

Respondents

HRTO File Number: 2014-18923-1

SCHEDULE A TO FORM 16

Request for Interim Remedy

1. Subsequent to the filing of an Application with this Tribunal and in violation of Section 8 of the Ontario Human Rights Code, the Canadian Soccer Association (CSA) and FIFA -- aided by national federations -- have threatened reprisals against a coalition of the world's best female soccer players for bringing this sex discrimination action.
2. Therefore, applicants submit the attached Form 16 Request for Interim Remedy asking the Tribunal to order respondents and their affiliates to cease all attempts to engage in or threaten reprisals against players who have joined or who are considering joining this action.

Governing Law on Interim Remedies

3. Under R. 23.2, the Tribunal is able to grant an interim remedy when: a) the Application appears to have merit; b) the balance of harm or convenience favours granting the interim remedy requested; and, c) it is just and appropriate to do so.
4. The Tribunal will also consider whether to avoid an irreparable harm, “[a]n interim remedy is necessary to facilitate and ensure the Tribunal is able to award a complete, appropriate and effective remedy at the end of a hearing, should a violation of the Code be found.” *Kaura v. PIMCO LLC*, 2014 HRTO 98. Such remedies “constitute an order to do or refrain from doing something in the absence of a finding that the Code has been violated” *Id.* The onus is on applicants to establish that an interim remedy is needed. *TA v. 60 Montclair*, 2009 HRTO 269. However, the Tribunal has granted such relief on numerous occasions. *See, e.g., R.B. v. Keewatin-Patricia District School Board*, 2013 HRTO 130 (The Tribunal found that the student applicant missing an entire year of school was irreparable, so they granted the request for an interim remedy and ordered the school to allow the student to return while the Tribunal was still deciding the merits).

The Application Itself Has Merit

5. The players argue in their Application, *inter alia*, that:

[Respondents'] decision to hold the tournament on artificial turf [constitutes unlawful discrimination] in three significant ways: (1) by forcing them to compete on a surface that fundamentally alters the way the game is played, (2) by subjecting them to unique and serious risks of injury, and (3) by devaluing their dignity, state of mind, and self-respect as a result of requiring them to play on a second-class surface before tens of thousands of stadium spectators and a global broadcast audience.

6. Under Section 1 of the Ontario Human Rights Code, “every person has a right to equal treatment with respect to services, goods, and facilities, without discrimination because of

race, ancestry, place of origin, colour, ethnic origin, citizenship, creed, sex, age, marital status, family status or handicap.” As this Tribunal has held, “the right to participate...in athletic activity without discrimination is guaranteed by s. 1 of the Human Rights Code.” *Blainey v. Ontario Hockey Association*, (1986) 54 Or. (2d) 513.

7. The Application, which as amended now includes the allegations of reprisals, sufficiently demonstrates a likelihood of success on the merits.

The Balance Of Harm Favours The Granting Of An Interim Remedy: Respondents Have Engaged In An Illegal Scheme To Threaten Applicants With Reprisals

8. Reprisals or threats of reprisals are unlawful under the Human Rights Code, which provides that: “Every person has a right to claim and enforce his or her rights under this Act, to institute and participate in proceedings under this Act and to refuse to infringe a right of another person under this Act, without reprisal or threat of reprisal for so doing.” (Section 8). This Tribunal has consistently recognized and granted relief when respondents turned to intimidation tactics. *See, e.g., Pilkey v. Guild Automotive Restorations Inc.*, 2012 HRTO 1522 (The Tribunal found reprisal where Pilkey was fired after filing a sex discrimination claim in the Tribunal, and there was no history of bad work, complaints, or warnings.); and *Smith v. Menzies Chrysler*, 2009 HRTO 1936 (The Tribunal found reprisal where Smith was fired after filing his claim).
9. The declaration attached to our Form 16 request includes attestations of threatening actions taken against the players involved. *See McConaghie v. Systemgroup Consulting Inc.* 2014 HRTO 295 (The Tribunal found that McConaghie’s firing was reprisal for her sex discrimination claim against Systemgroup after inferring intent from Respondent’s actions).
- A. Teresa Noyola Withdrew from the Application After Being Threatened With Reprisals.
10. Teresa Noyola is a professional footballer who plays for the Houston Dash and the Mexican National Team. In 2011, she won the Hermann trophy, awarded to the collegiate women’s soccer player of the year. On July 25, 2014, Noyola entered into an attorney-client relationship with applicants’ counsel. On October 3, 2014, Noyola signed a Form 27 consent form.

11. Ms. Noyola was slated to play in World Cup qualifying matches in October of 2014. Soon before the matches began Mexican Federation officials communicated to Ms. Noyola that FIFA was preparing to suspend or unaffiliate her because of her participation in this action. As a result, Mexican officials indicated that she would not be invited to participate as a member of the Mexican national team unless she withdrew as an applicant. Immediately after Ms. Noyola withdrew as an applicant, the Mexican Federation invited her to play in the World Cup qualifying games.
 12. In an October 14 letter to the Registrar, CSA counsel wrote, “On October 10, [CSA] received correspondence from the Federacion Mexicana de Futbol Asociacion that Ms. Noyola also did not consent to being named in the Application.” The letter included a copy of an email from applicants’ counsel to Ms. Noyola.
 13. Ms. Noyola did consent to legal action, as proven by her Form 27. Applicants’ counsel can provide further proof of Ms. Noyola’s consent to the Tribunal upon request.
 14. CSA’s October 14th letter to the Tribunal is evidence that it has been in communication with those attempting to deny Ms. Noyola’s participation and force her withdrawal.
 15. These actions taken against Ms. Noyola constitute unlawful threats of reprisal under the Human Rights Code.
- B. Camille Abily and Élise Bussaglia Removed Their Names After Being Threatened With Reprisals.
16. Camille Abily and Élise Bussaglia, both of France, have requested to be removed from the group of applicants seeking relief in this matter. Ms. Abily and Ms. Bussaglia reserve the right to rejoin the applicants. On August 16, 2014, Ms. Abily entered into an attorney-client relationship with applicants’ counsel and was included in the group of named applicants, and on October 3, Ms. Abily signed a Form 27 consent. On August 17, 2014, Ms. Bussaglia entered into an attorney-client relationship and was subsequently included in the group of named applicants; on October 3, Ms. Bussaglia signed a Form 27 consent.
 17. Ms. Abily and Ms. Bussaglia were led to believe that their continued participation in this action would lead to retaliation by FIFA in the awarding of the 2019 women’s World Cup. (France is one of several nations seeking to be awarded the 2019 World Cup.)
 18. The actions taken against Ms. Abily and Ms. Bussaglia constitute unlawful threats of reprisals under the Human Rights Code.

C. Applicants Diana Saenz And Katherine Alvarado Of Costa Rica Are Victims Of Respondent Intimidation, Along With Another Costa Rican Applicant

19. Ms. Saenz and Ms. Alvarado, along with a third Applicant, were told by Costa Rican Federation Officials that their participation put their positions on the team in jeopardy as a result of pressure from CSA and FIFA.
20. CSA counsel's letter to the Registrar of October 14 demonstrates that CSA has been communicating with the Costa Rican Federation officials. Threats of reprisal have resulted from such communications. According to CSA, it "has been informed by the Selecciones Nacionales de Futbol of Costa Rica that in fact those players did not consent to the filing of any legal proceeding in their names and are not represented by any lawyer." Indeed, contrary to how CSA was "informed," both players did indeed consent to this legal action, which applicants' counsel confirmed in a letter of October 15 to the Registrar.
21. The actions taken against the Costa Rican players constitute unlawful threats of reprisals under the Human Rights Code.

D. The President Of The United States Soccer Federation Believes Applicants Face Reprisals Threats From FIFA

22. In communications with applicants' counsel, Sunil Gulati, President of the United States Soccer Federation, indicated that he believed players risked suspension by FIFA -- carried out by national federations -- as a result of their application.
23. Gulati responded to applicants' counsel's request for assurances against retaliation by stating that his federation "plans to continue abiding by all applicable laws, rules and regulations, including state and federal law and the regulations imposed on [it]. Two relevant bylaws are copied below." Within the bylaws cited by Gulati is the claim that: "For a violation of this bylaw, the offending party shall be subject to suspension..."
24. Gulati also cited the following: "JURISDICTION OF FIFA AND COURT OF ARBITRATION FOR SPORT. Section 1. FIFA shall have jurisdiction on all international disputes between any Organization Member, official, league, team, player, coach, administrator, or referee and any party belonging to any other FIFA national association or confederation."

25. CSA quoted from the very same bylaws in its Response to the Applicants' Request for Expedited Relief (10/9/2014) at 3.

It Is Just And Appropriate In The Circumstances To Grant Applicants' Request

26. The Tribunal will consider whether an interim remedy is “necessary to facilitate and ensure the Tribunal is able to award a complete, appropriate and effective remedy at the end of a hearing, should a violation of the Code be found” (*TA v. 60 Montclair*, 2009 HRTO 369 (CanLII)). Injunctive relief has become necessary to keep applicants from being forced to drop their claim and suffer the irreparable harm of missing out on a once-in-a-lifetime opportunity, simply out of fear of reprisals. It is also necessary to ensure that those interested in joining the Application will be able to do so without fear.

27. In another case involving CSA, a Canadian court detailed how the possibility of missing a major soccer tournament was a patently irreparable harm. When a team was denied the right to play in league playoffs, it sought relief from the Ontario Court of Justice. The Court held that the case “present[ed] a harm that is significant and irreparable, both to players, organizers, owners and fans, who I have no doubt would prefer that the issue be solved on a playing field rather than in a court of law . . . [The] opportunity may never again be the same for the players or for the fans...” *Oz Optics LTD. V. Canadian Soccer Assn.*, 2001 CarswellOnt 4955 (On. Court of Justice 2001).

28. In an attempt to tip the equities in their favor, FIFA and CSA may claim that the organizations' internal dispute resolution procedures (as set forth in their bylaws) were not exhausted. Such an argument is without merit for several reasons.

29. First, if CSA and FIFA believe that organizational bylaws trump the Human Rights Code their proper recourse is to argue as much in court. What is not proper is for the respondents to retaliate against the applicants players by threatening their participation on their national teams or in the World Cup. Indeed, CSA has tried before to punish litigants for seeking redress in Canadian courts, citing FIFA bylaws. The Court of Appeal of Alberta held that making “express threats to harm someone for going to court or acting as a witness in court . . . or . . . punishing him for having done so[.]” – was contrary to “public policy.” *Voorhorst v. Canadian Soccer Association*, 2011 ABCA 74. The Court declared that, “[e]veryone in Canada has a constitutional right of access to Her Majesty’s courts as a litigant or as a witness. The punishment impending here (and imposed against the other litigants in the parallel proceedings) is for doing just that.” *Id.*

30. Hilary Findlay, of the Centre for Sport and Law, wrote of the *Voorhorst* case that “the Alberta Court of Appeal has reminded us in no uncertain terms that sport organizations cannot, through their bylaws or policies, or through threats of disciplinary action, stop

individuals from seeking recourse in the courts.” Hilary Findlay, *Case Comment: Voorhorst v. Canadian Soccer Association – A Bylaw That Went Too Far*, Sport Law and Strategy Group, Mar. 17, 2011. A leading Canadian authority in sports law and procedural fairness, Professor Findlay continued: “the court made it clear that any attempt to thwart a person from going to court, whether through policies and rules or through threats of disciplinary action, is simply not acceptable.” *Id.*

31. Second, there is no evidence that any of the applicants have agreements with respondents (much less enforceable ones) that require adherence to CSA and FIFA bylaws.
32. Third, even if such bylaws were applicable to applicants, the Tribunal has held that an applicant is “not require[d] to exhaust internal . . . remedies before filing an application with the Tribunal.” *Dyal v. Toronto Transit Commission*, 2009 HRTO 828 (2009). It has also held that it is not necessary “to exhaust other avenues before making an application to the Tribunal.” *Ramnath v. Peel Regional Police*, 2010 HRTO 548 (2010).
33. Put simply, respondents cannot claim that their bylaws supersede the Human Rights Code or justify the reprehensible reprisal threats directed at the applicants.

Conclusion

34. Attempts to silence applicants serve to perpetuate the discrimination that the Human Rights Code is designed to prevent. Such reprisals also infringe on the natural and legal rights of free speech and interfere with the attorney-client relationship.
35. Because respondents are engaged in an illegal scheme to intimidate players by threatening to bar them from competing in the World Cup for participating in this matter, we therefore ask for the following interim remedy:

A cease and desist order enjoining respondents from threatening or enacting reprisals against the applicants as a result of their participation in this matter including, but not limited to, reprisals related to applicants’ membership on their respective national teams.

BOIES, SCHILLER & FLEXNER LLP

Hampton Dellinger
Rocky Collis
Amos Friedland
Kate Ferguson
Joshua Stein

RYDER WRIGHT BLAIR & HOLMES LLP

By: _____
David Wright
Jane Letton

OSLER, HOSKIN & HARCOURT LLP
Catherine Gleason-Mercier

Schedule B

Jackie Acevedo

Fatmire Alushi

Katherine Alvarado

Nadine Angerer

Melanie Behringer

Laura Benkarth

Verónica Boquete

Shannon Boxx

Pauline Bremer

Stephanie Cox

Jennifer Cramer

Shirley Cruz

Fabiana da Silva Simões

Whitney Engen

Abby Erceg

Verena Faißt

Caitlin Foord

Caroline Graham Hansen

Ashlyn Harris

Tobin Heath

Kathrin Hendrich

Josephine Henning

So-Yun Ji

Tabea Kemme

Sam Kerr

Meghan Klingenberg

Annike Krahn

Sydney Leroux

Eugénie Le Sommer

Melanie Leupolz

Carli Lloyd

Allie Long

Annalie Longo

Dzsenifer Marozsan

Stephany Mayor Gutierrez

Anja Mittag

Alex Morgan

Alyssa Naeher

Erin Nayler

Yuki Ogimi

Kelley O'Hara

Heather O'Reilly

Melissa Ortiz

Babett Peter

Alexandra Popp

Christie Rampone

Megan Rapinoe

Alexandra Riley

Amy Rodriguez

Rebecca Rolls

Arianna Romero

Diana Saenz*

Becky Sauerbrunn

Almuth Schult

Bianca Sierra

Hope Stevens

Rachel Van Hollebeke

Marta Vieira da Silva

Abby Wambach

Lisa Weiss

Hannah Wilkinson

* As detailed in the accompanying submissions, this player has been targeted with reprisal threats; we are currently trying to confirm her status with regards to the application.

HUMAN RIGHTS TRIBUNAL OF ONTARIO

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Applicants

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FÉDÉRATION INTERNATIONALE DE FOOTBALL ASSOCIATION ("FIFA")**

Respondents

HRTO File Number: 2014-18923-1

SCHEDULE A TO FORM 10

Request for Order During Proceedings

1. As outlined in our Schedule A to Form 16, subsequent to the filing of an Application with this Tribunal and in violation of Section 8 of the Ontario Human Rights Code, the Canadian Soccer Association (CSA) and FIFA -- aided by national federations -- have threatened reprisals against a coalition of the world's best female soccer players for bringing this sex discrimination action.
2. Therefore the Applicants submit the attached Form 10 Request for Order During Proceedings asking the Tribunal to permit the Applicants to amend their Application to include these allegations of reprisal. Attached is a revised Form 1 and Schedule A to Form 1 (Amended) which sets out these allegations in detail.

Governing Law on Requests to Amend Applications

3. The Tribunal's jurisprudence sets out a four (4) part analysis to be completed to determine whether to grant the request to amend. This analysis includes: 1) the nature of the proposed amendments; 2) the reasons for the amendments; 3) the timing of the request to amend; and 4) the prejudice to the respondent. See *Odell v. TTC*, [2001] OHRBID No. 2, *Dube v. Canadian Career College*, 2008 HRTO 336; *Wozenilek v. 7-Eleven Canada Inc.*, 2009 HRTO 926.

The Nature of the Proposed Amendments

4. The proposed amendments arise out of actions that were taken *after* the initial filing of the application and as a reprisal for the act of filing the application, and as such relate directly to the substance of the allegations. See *Wing v. Niagara Falls Hydro Holding Corporation*, 2013 HRTO 2106; *Schuller v. Parlee*, 2014 HRTO 257.
5. While the proposed amendments are found at paragraphs 11, 69-92, and 107 of the Schedule A to Form 1 (Amended), we briefly note that these actions include: 1) Teresa Noyola being successfully pressured to remove herself from participating in this Application or she would otherwise find herself without an invite in World Cup qualifying matches; 2) Camille Abily and Élise Bussaglia requested to have their names removed from this Application, which we believe was a result of intimidation; 3) Diana Saenz, Katherine Alvarado, and another Costa Rican player have been threatened with suspension from participating in World Cup qualifying matches; and 4) Sunil Gulati, President of the United States Soccer Federation, has warned of possible suspensions from competition for participating in the Application.

The Reasons for the Amendments

6. The applicants request an expeditious resolution of all matters arising out of respondent's discriminatory actions with respect to the 2015 World Cup. The reprisals of CSA and

FIFA are a direct result of the Application and cannot go unchallenged and unresolved; thus, they should be addressed in the current proceedings.

The Timing of the Request to Amend

7. The request to amend is being made shortly after the reprisal threats came to the attention of legal counsel for the applicants and a hearing has not yet been scheduled, nor has disclosure been exchanged. More importantly, respondents have not yet filed their Responses which are due November 6, 2014. Thus, the request is being made in a timely manner and will not impede or delay the hearing process.

The Prejudice to the Respondent

8. Respondents have suffered no prejudice as applicants have made a timely request to amend the Application as a direct result of the respondents choosing to engage in reprisals against the Applicants.

Conclusion

9. The applicants respectfully request that the Tribunal permit the Application to be amended as set out in the revised Form 1 and Schedule A to Form 1 (Amended).
10. Respondents should not be permitted to benefit from their decision to engage in reprisals against the applicants and to infringe the rights of the applicants to avail themselves of the protection that the Human Rights Code affords them. This request to amend should not prejudice or delay a response to our request for an expedited hearing. Respondents are fully aware of their communications with several national federations and continental confederations and thus, should not be permitted to benefit from an extension of time as result of their reprisals.

BOIES, SCHILLER & FLEXNER LLP

Hampton Dellinger
Rocky Collis
Amos Friedland
Kate Ferguson
Joshua Stein

RYDER WRIGHT BLAIR & HOLMES LLP

By: _____
David Wright
Jane Letton

OSLER, HOSKIN & HARCOURT LLP
Catherine Gleason-Mercier

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B E T W E E N:

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Applicants

-and-

**CANADIAN SOCCER ASSOCIATION ("CSA")
FÉDÉRATION INTERNATIONALE DE FOOTBALL ASSOCIATION ("FIFA")**

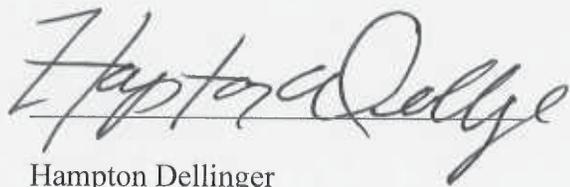
Respondents

Declaration in Support of Request for Interim Remedy

I, Hampton Dellinger, declare as follows:

1. I am an attorney licensed in the United States and I have been communicating with players protesting the plan of the Canadian Soccer Association (CSA) and FIFA to play the 2015 World Cup on an artificial surface.
2. After the players filed their application with the Tribunal, I started receiving reports that CSA and FIFA wanted applicants to know that they could be banned from competing in World Cup competition, including qualifiers. One specific player targeted was Teresa Noyola. I learned on October 3, 2014 that Mexican soccer officials communicated reprisals threats to her that were initiated by CSA and FIFA. Upon receiving these threats, Ms. Noyola withdrew from the Application. I believe that if she can be assured that she can participate in legal action without reprisal or threat of reprisal, she will rejoin.
3. I know that the Costa Rican applicants are also concerned about reprisal. It was reported to me in October that they were informed by officials with their national federation that their participation in the World Cup was endangered. My understanding is the reprisal threats communicated by Costa Rican officials to the applicants were initiated by CSA and FIFA.
4. On October 22, 2014, Camille Abily and Élise Bussaglia of France requested that their names be removed from the application. The French players were led to believe that their continued participation in the application could result in retaliation against France by FIFA as the nation sought to be chosen by FIFA as the host of the 2019 World Cup.
5. In October, I have had communications with Sunil Gulati, president of the United States Soccer Federation, regarding the reprisal threats initiated by CSA and FIFA. Mr. Gulati informed me that players could face the choice of continuing as applicants or face suspension from their national teams as a result of directives from FIFA. *See Exhibit A.*
6. I hereby declare all statements in this declaration to be true and correct.

Dated this 26th day of October, 2014

A handwritten signature in cursive script, reading "Hampton Dellinger". The signature is written in dark ink and is positioned above the printed name.

Hampton Dellinger

Boies, Schiller & Flexner LLP

EXHIBIT A

From: Sunil Gulati [REDACTED]
Sent: Tuesday, October 07, 2014 2:16 PM
To: Hampton Dellinger
Cc: Lisa Levine
Subject: RE: 2014 CONCACAF Women's Championship

Dear Mr. Dellinger,

Thank you for your correspondence; I have copied U.S. Soccer's general counsel on my response. Separate from this response, I do think a telephone call this afternoon might make sense. To that end, I'll try to reach you after lunch.

Please know that U.S. Soccer has no jurisdiction over national team members of other national associations acting in their national team member capacity. U.S. Soccer plans to continue abiding by all applicable laws, rules and regulations, including state and federal law and the regulations imposed on it by virtue of its membership in CONCACAF and FIFA, in addition to U.S. Soccer's own bylaws and policies. Two relevant bylaws are copied below:

Bylaw 707. LITIGATION

Section 1. No Organization Member, official, league, club, team, player, coach, administrator or referee may invoke the aid of the courts in the United States or of a State without first exhausting all available remedies within the appropriate soccer organization, and as provided within the Federation. This bylaw does not apply to the commencement of an arbitration proceeding under these bylaws or the USOC Constitution and Bylaws or the enforcement of a decision rendered in such a proceeding.

Section 2. For a violation of this bylaw, the offending party shall be subject to suspension and fines, and shall be liable to the Federation for all expenses incurred by the Federation and its officers in defending each court action, including but not limited to the following:

- (1) court costs.
- (2) attorney's fees.
- (3) reasonable compensation for time spent by Federation officials and employees in responding to and defending against allegations in the action, including responses to discovery and court appearances.
- (4) travel expenses.
- (5) expenses for holding special National Council meetings necessitated by the court action.

Bylaw 708. JURISDICTION OF FIFA AND COURT OF ARBITRATION FOR SPORT

Section 1. FIFA shall have jurisdiction on all international disputes between any Organization Member, official, league, team, player, coach, administrator, or referee and any party belonging to any other FIFA national association or confederation.

Section 2. Any appeal against a final and binding FIFA decision shall be heard by the Court of Arbitration for Sport ("CAS"), unless such decision relates to violations of the Laws of the Game or suspensions of up to four matches or up to three months.

Section 3. The Federation and each of its Organization Members shall ensure that all officials, leagues, teams, players, coaches, administrators, and referees participating in their respective programs comply with any final decision passed by FIFA or CAS.

Best regards,

Sunil Gulati