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**TED WELLS RELEASES REPORT TO THE NATIONAL FOOTBALL LEAGUE**

**INDEPENDENT REPORT PUBLICLY AVAILABLE AT [WWW.NFLDOLPHINSREPORT.COM](http://WWW.NFLDOLPHINSREPORT.COM)**

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**New York, February 14, 2014** – Ted Wells, co-chair of the Litigation Department at Paul, Weiss, Rifkind, Wharton & Garrison LLP (“Paul, Weiss”), has released his independent Report to the National Football League concerning allegations of workplace misconduct at the Miami Dolphins. The Report is publicly available at [www.NFLDolphinsreport.com](http://www.NFLDolphinsreport.com).

Mr. Wells was retained by Commissioner Roger Goodell on November 6, 2013. The Report is the result of an independent investigation led by Mr. Wells into allegations that the abrupt departure of Dolphins starting offensive lineman Jonathan Martin on October 28, 2013, midway through the season, was the result of persistent bullying and harassment by some of his teammates.

Paul, Weiss has conducted a comprehensive investigation, aided by full cooperation from the NFL, the National Football League Players Association and the Miami Dolphins. Paul, Weiss reviewed thousands of voluntarily produced documents, including text messages, emails and team policies, and completed more than 100 interviews, including interviews of all Dolphins players and coaches, key front office personnel, and the team’s owner and chairman.

Said Mr. Wells: “The Report concludes that three starters on the Dolphins offensive line, Richie Incognito, John Jerry and Mike Pouncey, engaged in a pattern of harassment directed at not only Jonathan Martin, but also another young Dolphins offensive lineman and an assistant trainer. The Report finds that the assistant trainer repeatedly was the object of racial slurs and other racially derogatory language; that the other offensive lineman was subjected to homophobic name-calling and improper physical touching; and that Martin was taunted on a persistent basis with sexually explicit remarks about his sister and his mother and at times ridiculed with racial insults and other offensive comments.”

“The Report rejects any suggestion that Martin manufactured claims of abuse after the fact to cover up an impetuous decision to leave the team. Contemporaneous text messages that Martin sent to his parents and others months before he left the Dolphins—which have never before been made public—corroborate his account that the persistent harassment by his teammates caused him significant emotional distress. The Report concludes that the harassment by Martin’s teammates was a contributing factor in his decision to leave the team, but also finds that Martin’s teammates did not intend to drive Martin from the team or cause him lasting emotional injury,” said Mr. Wells.

“Consistent with my prior practices involving similar investigative reports, it is not my present intention to hold a press conference or comment further about the Report. The Report is thorough and comprehensive, and speaks for itself,” said Mr. Wells.

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