

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF NORTH CAROLINA  
No. 1:24-CV-00238-CCE-JEP**

REESE BRANTMEIER and MAYA  
JOINT, on behalf of themselves and  
all other similarly situated,

*Plaintiff,*

v.

NATIONAL COLLEGIATE  
ATHLETIC ASSOCIATION,

*Defendant.*

**DECLARATION OF MATTHEW  
FORBES IN SUPPORT OF  
PLAINTIFFS' MOTION TO ADD  
CLASS REPRESENTATIVE**

I, Matthew Forbes, first being duly sworn, declare as follows:

1. I am over 18 years of age, of sound mind, and am otherwise competent to testify to my personal knowledge of the matters set forth herein.
2. I submit this Declaration in support of Plaintiffs' Motion to Add Class Representative in this matter. I am a member of the Damages Class and Injunctive Relief Class in this litigation.
3. I am currently a resident of Columbus, Franklin County, Ohio, and currently a junior student at The Ohio State University ("Ohio State").
4. I am the recipient of a full athletic scholarship and a member of Ohio State's NCAA Division I men's tennis team.

5. As of May 2026, I am ranked No. 15 in singles and No. 38 in doubles nationally by the Intercollegiate Tennis Association.

6. For my freshman and sophomore years, from fall 2024 through spring 2026, I attended Michigan State University (“Michigan State”) in East Lansing, Michigan.

7. During that time period, I competed on Michigan State’s NCAA Division I men’s tennis team, playing the No. 3 and 4 positions my freshman year and No. 1 and No. 2 positions my sophomore year.

8. I qualified for the 2024 US Open Championship (“US Open”) in Flushing Meadows, New York, by winning the United State Tennis Association (“USTA”) Boys’ 18-Under National Championship.

9. I enrolled at Michigan State in mid-August 2024 and was enrolled at Michigan State at the time of the 2024 US Open.

10. I competed in the first round of men’s singles in the main draw of the 2024 US Open, losing in four sets to Roman Safiullin.

11. As a result of my performance in the 2024 US Open, I was entitled to receive approximately \$100,000 in prize money from the USTA.

12. However, the NCAA’s rules prohibited me from accepting any of the prize money earned in excess of my “actual and necessary” expenses incurred during the US Open competition.

13. As a result of the NCAA rules, and in order to preserve my collegiate eligibility, I forfeited approximately \$55,587.

14. I intend to complete my undergraduate education and compete in NCAA Division I men's tennis for the remainder of my collegiate eligibility, which as of this Declaration includes the upcoming 2026-2027 and 2027-2028 seasons.

15. For the remainder of my collegiate career, I intend to compete in USTA and other non-NCAA competitions, for which I qualify, including but not limited to the US Open, in addition to competing for the Ohio State's men's tennis team.

16. For example, I was invited to participate and will compete in the upcoming USTA Collegiate Player Wildcard Playoffs on June 16-18, specifically the men's singles playoffs.

17. The USTA Collegiate Player Wildcard Playoff for men's singles is a two-round competition between four nationally-ranked collegiate student-athletes, wherein the finalists gain qualification to the 2026 US Open.

18. Should I win my semifinal match at the USTA Collegiate Player Wildcard Playoffs, I automatically earn a wild card qualification for the 2026 US Open qualifying tournament. If I win the finals match, I automatically earn a wild card qualification for the 2026 US Open main draw.

19. Given my forfeiture of US Open prize money and status as an NCAA Division I tennis student-athlete, I am a member of both the Damages Class and Injunctive Relief Class in this litigation.

20. I wholeheartedly support this lawsuit challenging the NCAA's continued enforcement of its rules restricting student-athletes' ability to accept prize money.

21. I also support the proposed settlement of this lawsuit as it provides monetary relief for the Damages Class, eliminates a portion of the prize money rules that harmed or would have continued to harm members of the Injunctive Relief Class, and allows current student-athletes (as well as future student-athletes) who suffer monetary damages after November 21, 2025 to pursue legal action against the NCAA to recover these damages.

22. I declare under penalty of perjury the foregoing statements are true and accurate to the best of my personal knowledge and belief.

This the 11th day of June, 2026.

A handwritten signature in black ink, appearing to be 'MF' or similar initials, written in a cursive style.

---

Matthew Forbes