

# EXHIBIT 2

Department of Motor Vehicles

Special Processing Unit

MS D238

2415 First Avenue

Sacramento, CA

July 3, 2018

**APPEAL OF REFUSAL TO ISSUE PERSONALIZED LICENSE PLATE, X-REF 093, LIC: C O Y W**

Dear Sir/Madam:

One hundred and forty years ago, London's first league football (soccer) team, the Fulham Football Club, took the field at their home park in West London, wearing then, as now, all-white jerseys. As such, they were known (and still are known) as "The Whites," just as their soon to be neighbors, the much larger and much more famous Chelsea Football Club, with their iconic blue jerseys were (and still are) known as "The Blues," and in northern England, the famous Liverpool Football Club, with their red jerseys, were known (and still are) called by everyone, "The Reds," and in the British Midlands, the Coventry Football Club, are the "Sky Blues," after their signature jersey color.

These are simple meanings with simple explanations, no double entendre ever suggested. (For instance, during the Cold War, no one refrained from referring to Liverpool as "The Reds," on the chance that their nickname might be interpreted to mean that they were Communists. To do so would have been beyond foolish.)

This naming of a team after the color of their uniforms is a worldwide practice. In California, of course, there is the Stanford "Cardinal," named after the color of their uniforms, not some bird. Cal alums refer to themselves, and are referred by others, as "Old Blues." Indeed, America's oldest collegiate sports team goes by the name of the Harvard "Crimson." A few hours' drive to their west, one will find the Syracuse "Orangemen." And, of course, the Alabama Crimson Tide are known far and wide. Guess the color of their jerseys?

Since day one, Fulham supporters cheered on their team, the Whites, by chanting, rhythmically, "Come on you Whites, Come on you Whites." These four words have been taken on by all connected with the Fulham club as a kind of members' signature greeting, used when addressing one another, usually shortened to the first letter of each word, or "COYW."

Indeed, so prevalent is this greeting among Fulham players, staff, and supporters, (and, as will be demonstrated in a following paragraph, even by the team's Pakistani-American owner), that it also has been adopted as the team's Twitter hashtag, which is "#COYW." It is also used on Fulham souvenir merchandise and clothing. And it has nothing to do with anything other than support of this beloved team. Frankly, to suggest that these simple words of support "carries connotations offensive to good taste and decency," is more than a little bit perverted, if not outright twisted.

To show the breadth and innocence of these letters and the greeting and support they represent, I have attached the following:

1. The team's owner, Mr. Shadid Khan's greeting to the fans, as photocopied from the match program of this past April 27, the last home match of the year. Notice how Mr. Khan refers throughout his message to "the Whites" and how he signs off: "Come on You Whites." Don't you think, as a non-white person himself, if he, as team owner, thought there was something offensive in the team signature phrase or the team nickname, that he would have changed it rather than, as he and everyone else associated with the team for the more than a century has, embracing it fully?
2. The cover of that same program. It shows Fulham's star player, 18 year old Ryan Sessegnon, a local London-born young man who has played for Fulham and its youth teams since he was nine years old. As does and has his brother, Steven. An absolutely phenomenal talent, this season he was named the league's Player of the Year. At the time he was so named, he was all of seventeen years old. Ryan has had several opportunities to move on to much bigger, richer teams and will have many more in the future. Instead, he has put personal wealth and increased fame aside, and has extended his contract to remain with his boyhood team, Fulham. And in recognition of his local roots, when he takes the field, the fans chant, "He's one of our own, he's one of our own. Ryan Sessegnon, he's one of our own." He is a White, through and through.
3. A photograph I took of two of the "clappers" passed out by the team to their home fans used to generate supportive noise at the stadium. The first, shows their team slogan, "Come On You Whites" (abbreviated: "C O Y W"). The second urges the crowd to "Make Some Noise," along with the Twitter hashtag, "#COYW."

4. The social media page from the team program, under the title “#COYW.”
5. A page from a game program last fall, urging fans to purchase Fulham-related products for the Holidays. The ad tag line was “Make it a Whites Christmas.”
6. A series of photographs showing team highlights from the previous twelve months. The use of the word “Whites” to describe the team is repeated throughout, as highlighted.
7. A letter published in the match program from Antony Lin, an American fan, apparently of Chinese heritage, wherein he explains why he roots for Fulham, especially referencing the number of Americans who have played for the club. Included in this list is Carlos Bocanegra, the former captain of the USA men’s national team, a California born Mexican-American, an alumnus of UCLA, and former Fulham fan favorite (and captain). Bocanegra fit right in to the Fulham team ethos, as it always has been one of the most inclusive teams in all of British football. Come on You Whites? Currently Fulham’s players come from 15 countries, including, of course England, Scotland, Ireland and Northern Ireland, but also the Congo, Togo, Portugal, Norway, Brazil, Spain, Belgium, Slovenia, France, Serbia, and the United States. Over the years, so many Americans have played for Fulham (including their all-time high scorer, Clint Dempsey), that in England the team is often jokingly referred to as “FulAmerica.” In addition, the Whites’ manager (coach) is from Serbia and their owner, Shadid Khan, is a Pakistani-born naturalized American citizen. And they are all proud to be “Whites.” (Remember, in international team soccer/football, there is no draft. Players play for the clubs they play for by coming to them by choice; purely voluntarily.)
8. The first page of the most recent issue of “football” a popular British football blog that covers the London professional teams. The highlighted first line tells of Fulham’s current refusal to match the asking price for a player it wishes to bring into the squad but who currently plays for another team. And it refers to Fulham, naturally, as “The Whites.”
9. A one page insert that came with my Fulham season tickets this past year. It is a letter of welcome from the aforementioned team owner, Mr. Khan, and says that my ticket provides me with a “a guaranteed seat at Craven Cottage for all of the Whites’ home games.”



10. and 11. And finally, copies of two pages from the latest Fulham merchandise catalogue, offering t shirts emblazoned with the legend: "COYW." In your choice of colors.

I believe that the foregoing shows without a shadow of a doubt that the letters "COYW," as requested for my personalized California license plate hardly is "offensive to good taste and dignity." Rather, the phrase "Come On You Whites" is emblematic of a team and a team culture that, for more than a century, has represented both good taste and dignity. To suggest otherwise, as has the DMV in denying my personalized license request to this point, is evidence either of malice or ignorance, but, in either event, without some evidence to the contrary, hardly amounts to sufficient grounds to deny me the requested license plate.

Moreover, as the letter I received from your M. Acosta accurately points out, by denying me the requested vehicle plate, the State of California has opened the door to questions regarding my rights to free speech and expression under both the United States and California Constitutions.

Given that I am an attorney who teaches Constitutional Law (at the Annenberg School of the University of Southern California), I would have no problem whatsoever if forced to seek redress of this matter at a higher level. However, I sincerely hope it does not come to that, and with all the material of explanation I have provided you herein, that this will end the matter and that I am forthwith permitted to enjoy my rights to free speech and free expression and be allowed to proudly place the Fulham slogan of "C O Y W" on my automobile.

If not, however, any subsequent proceedings will provide a real world example for my students at USC of what freedom of speech entails and how it must be defended every day in the face of state action attempting to deny it.

Very Truly Yours,

Jonathan Kotler

cc: Jean Shiimoto

# Shahid Khan THE CHAIRMAN

Shahid Khan is full of praise for all connected with Fulham after a stellar season to date...

**G**ood evening and thank you for choosing to spend your Friday night with Fulham Football Club, under the floodlights and on the occasion of drawing the curtain on the home portion of one of the more memorable and impressive regular seasons in your Club's brilliant history.

It's our penultimate match, our 45th fixture in a gruelling but rewarding journey in the Sky Bet Championship and, of course, I hope it will be our final home appearance this season. As much as we all love Craven Cottage, wouldn't it be great if we don't have to return to play again in May?

There are few words to adequately describe what we've experienced here at our home ground and wherever the Whites have appeared over the past four months. I cannot tell you anything about our stunning unbeaten run that you don't already know. I cannot add anything to the explosive and emotional victory a week ago tonight at Millwall that continues to resonate throughout our Club. And now, with the good fortune resulting from Derby County's win over Cardiff City on Tuesday, I'm no different than you, entertaining all the scenarios and outcomes over the final two weekends of the season that might lift us to a second-place finish on 6th May.

All I can offer is, it's no exaggeration to say that Fulham have been the talk of English football and likely beyond since our last league defeat in mid-December against Sunderland, our

guests this evening. That makes me exceptionally proud to be your Chairman, and I thank each of you for being part of a story that now only lacks the happy final chapter that you, our coaches, staff and players all deserve.

Your Club has also enjoyed a spectacular run off the pitch in recent weeks. While it seems like a long time ago, it was only 20th March when our plans to redevelop the Riverside Stand at Craven Cottage were approved at a London Borough of Hammersmith and Fulham planning hearing. Perhaps

*"Our players mirror Slaviša Jokanović's determination and class. No matter how our campaign ends, our appreciation for Slaviša should last a lifetime"*

in other seasons, this news would be carrying the day in SW6. Understandably, that's not true for now. Nonetheless, the news represents a major achievement for Fulham Football Club and the many residents and supporters who banded together to help this project earn the approval it merited.

We plan to begin work just over a year from now and what eventually awaits us will serve your Club and

the neighbourhood for generations to come. Whether Fulham are in action or not, the new Riverside Stand – and the uninterrupted walking path along the Thames that it will provide – will bring new life, opportunities and pride to us all. And, let's never forget possibly the most important element of the new Riverside Stand, and that's helping to ensure a stable and sustainable future for Fulham as well as our historic and beloved home here at Craven Cottage.

For more good news, off the pitch, allow me to congratulate Yann M'Vogo on recently collecting an astonishing five EFL awards: The Apprentice of the Year, Young Player of the Season and Championship Player of the Season, the latter of which he was up against his teammate and captain Tom Cairney as well as the spectacular Robert Taylor of Wolverhampton Wanderers. Ryan was also named as a member of the Championship Team of the Year with James and Ryan Fredericks, and he received special recognition awarded by the EFL Club Developed Player award – a definitive nod to the captaincy and influence of our Academy under the tutelage of Huw Jenkins.

And there's also good news just last weekend, as Ryan was among the nominees for the Football Writers' Association Young Player of the Year award. In the words, become the first player to be named of the Premier League to be named up this year. Ryan is a player who has the potential to be a star in the Premier League, but he's not a star yet – and

to see his brilliance recognised at the highest level of the English game. Well done, Ryan!

Of course, we don't need an awards ceremony to tell us that in Slaviša Jokanović we have one of the very best men in the game, and in any category imaginable. The results Slaviša has posted as our Head Coach over the past two seasons speak for themselves, but I'd personally like to acknowledge something more. When I think of Slaviša, I consider the presence, integrity and pride he brings to your Club, certainly not only on matchday, but also as we train, as we travel and in all manners of representation of Fulham. Our players mirror Slaviša's determination and class, giving all of us one more reason to love this squad. No matter how our campaign ends, our appreciation for Slaviša Jokanović should last a lifetime.

And what a time to appoint Alex White to the role of Official Club Historian! You're probably

familiar with Alex, but if not, he has unofficially served as Fulham's historian in the past, with credentials that are virtually unrivalled given that he attended his first Whites match in 1962. Alex is the author of numerous books on Fulham and he continues to contribute to the programme you're reading now. I'm delighted that his years of service are being duly noted with his official appointment as our historian, during what is unquestionably an historic season for your Club.

It's a great time to be a Fulham supporter, and that's evident in the strong interest so far in 2018/19 Season Tickets, renewals and new purchasers alike. Whether we're playing 19 or 23 league matches at home next season, being able to count on your passion and faith is important, appreciated and never overlooked.

And, to members of the Fulham family everywhere, whether you

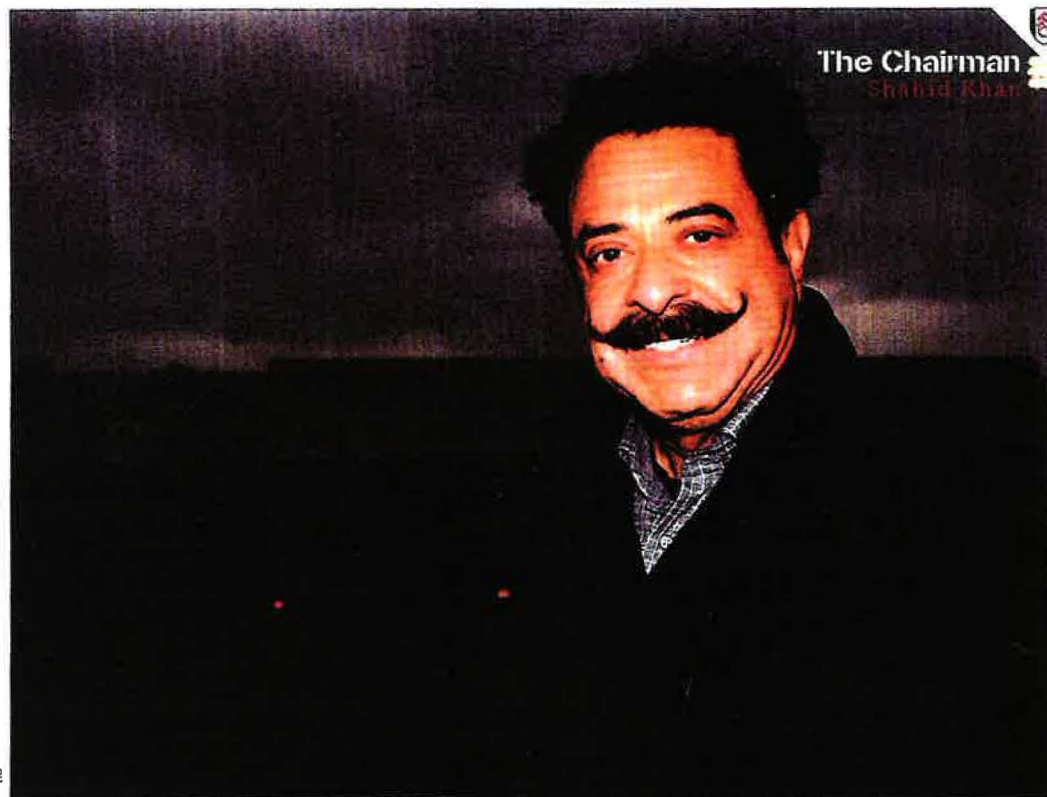
attend the occasional match at the Cottage, travel on the coach to back the Whites on the road, or tune in around the world to the descriptions of Gentleman Jim and Jamie Reid, always know that your support is every bit as treasured. To everyone who produces independent Fulham podcasts, fanzines and fan forums, I thank you as well for your authentic voice and energy. To the Fulham staff, from the backroom to the front office, to everyone dedicated to making matchday at Craven Cottage the ultimate football experience, thank you for being the best in the business.

Literally to everyone, thanks for a magical season.

**Come On You Whites!**

*Shahid Khan*

Shahid Khan, Chairman.







Season  
2017/18

*We are...*

# FULHAM

AWARDED  
'CHAMPIONSHIP  
PROGRAMME  
OF THE SEASON  
2017/18'  
BY PROGRAMME  
MONTHLY  
MAGAZINE



Friday 27 April 2018 | Kick Off: 7:45pm

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Thank you for your support.

VISITFLORIDA

COME ON FULHAM

Make  
some noise  
**#COYW**



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# COYV

A round-up of our favourite recent tweets and Instagram posts by players, fans and the Club's official account. Follow Fulham on Twitter and Instagram @FulhamFC



## twitter

### FFC Official

@FulhamFC • Dec 14

**MOTM:** [@JohnWhites](#) was the comprehensive winner of Man of the Match last night, claiming 64.4% of the votes.

@FulhamFC • Dec 13

[@FulhamFC](#) would have preferred the win to have been more comfortable, but was satisfied with the character shown.

@FulhamFC • Dec 13

**FT:** There goes the whistle, as the Whites come from behind to take all three points!

@FulhamFC • Dec 13

**ACTION SHOT:** The moment Johansen made it 1-1.



@FulhamFC • Dec 13

**CONFIRMED:** Our FA Cup tie at Cardiff has been chosen for TV and will take place on Sunday 8th Jan (11:30am).

@FulhamFC • Dec 12

**FT:** [@FulhamFC](#) pick up an impressive 4-0 victory over Brighton as they return to winning ways in the PL2.

### FFC Players

@mattoriley8 • Dec 14



@LucasPiazon • Dec 13

Not an easy win tonight for us but an important one, feels good to get the three points. Saturday we go again! Thanks for the support!

@HunwobrysStevie

• Dec 13

Smiles all around.



@TayoEdun • Dec 12

About time!

@AronDavies05 • Dec 12

Solid 4-0 win against Brighton, different gravy from everyone tonight, always better with a clean sheet.

@\_StevenSess • Dec 10

Good 2-0 win from the boys today. Good performance. Clean sheet. Three points.

### FFC Fans

DarranHaynes04 • Dec 14

Tom Cairney alone completed more passes than the whole of the Rotherham team last night.

@Jaywatty • Dec 14

Nine points better off than at this stage last season.

@John\_gibby • Dec 14

The most exciting thing about Johansen is you really get the feeling there could be plenty more to come.

@Fulhamfutter • Dec 13

Johansen is a seriously good footballer. I didn't realise when we got him he'd be that good. Fredericks my MOM tonight, though.

@WestConor • Dec 13

On Saturday we'll really see if we're a team good enough to push for promotion. A huge game.

@louiscreamore • Dec 13

A total of 80 shots in the last three games [#endearing](#)

@chadperris • Dec 13

Good win with a missed pen in the mix. Highlight of the broadcast was the excitement from Jim and Jamie getting the pies.



## Instagram



lukejohann Fulham Football Club Dec 13  
She's only wearing the kit!



shawsy37 Fulham Football Club Dec 13  
Christmas outing to the Cottage



julieannnew Craven Cottage Dec 13  
[#fulham](#)

# CORAL

## FULHAM

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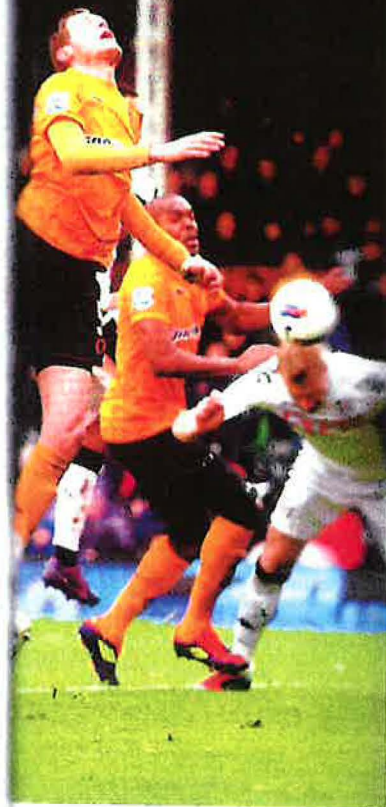
*UK Express Delivery cut-off date:  
Monday 19th December*

Stadium Store | [fulhamdirect.fulhamfc.com](http://fulhamdirect.fulhamfc.com) | 0843 208 1223

VISITFLORIDA



Pavel Pogrebnyak  
stoops to head in his first



## Hat-Trick Heroes

A detailed look at the Fulham players who've found the back of the net three times or more in one game...



# Fulham The Year In Pictures

As 2016 draws to a close, we look back at some of the key moments from another eventful 12 months for Fulham Football Club.



## January

Following his appointment as Head Coach a few days earlier, Slaviša Stokanović takes charge of Fulham for the first time as the Whites go down to a 1-0 defeat to Sheffield Wednesday at Craven Cottage.



## February

Three goals in 10 first-half minutes from Ross McCormack, Moussa Dembélé and Tom Cairney put the Whites on course for a memorable 3-1 win against local rivals Queens Park Rangers at Loftus Road.



## March

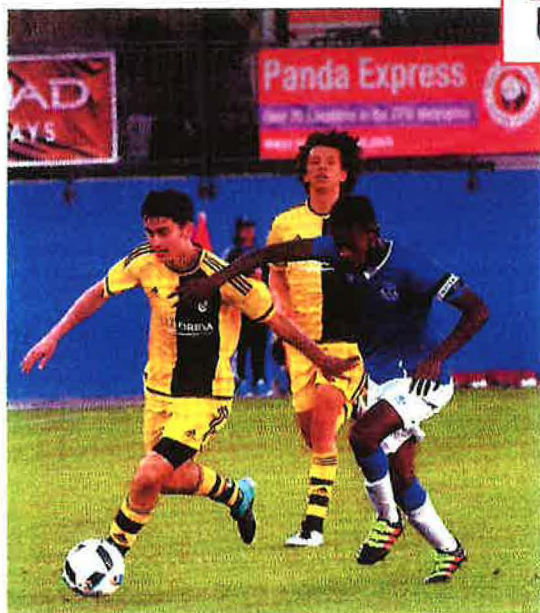
A Fulham Under-19 side reach the final of the FA Youth Cup but fall at the last hurdle to a 2-1 defeat to Everton, ending Fulham's goal.



## May

The Whites end the 2015/16 campaign with a 1-0 victory over already relegated Bolton Wanderers. Tom Cairney scores the winning goal in the 89th minute, his eighth goal of the season.





## March

A Fulham Under-19 side reach the Final of the Dallas Cup but fall at the last hurdle when they go down to a 2-1 defeat to Everton. Elijah Adebayo scores Fulham's goal.



## April

An injury-time strike by Emerson Hyndman earns Fulham a 2-1 win over Cardiff City and a third successive victory to edge further clear of the drop zone. Scott Parker had cancelled out Lex Immers' opener.



## May

The Whites end the 2015/16 campaign with a 1-0 victory over already relegated Bolton Wanderers. Tom Cairney scores the winner in the 77th minute, his eighth goal of the season.



## June

Dan Burn, Shaun Hutchinson, Alexander Kačaniklić and Jamie O'Hara are released, while Andrew Lonergan moves to Wolverhampton Wanderers. Moussa Dembélé and Emerson Hyndman join Celtic and AFC Bournemouth respectively.



# A Love

## SURPRISE!



A Fulham fan tells their unique **Whites**-related story. This evening it's the turn of **Antony Lin...**



**A**s a converted fan of football/soccer, I'm a supporter of the New York Red Bulls (formerly Metrostars) and the U.S. National Team (Men's/Women's). With many Americans supporting European clubs as well, I've often asked, 'Why am I going to follow a club thousands of miles away from home?'

With the likes of Fulham signing numerous U.S. internationals in the mid-2000s, I'd started taking notice. I was surprised to see **Carlos Bocanegra**, **Brian McBride** and **Clint Dempsey** getting significant minutes at such a high level.

Seeing the occasional match from afar, I decided that watching Fulham on TV wasn't enough. Seeing the beautiful Craven Cottage on TV was just a tease. I needed to attend a Fulham match.

I went to Fulham versus Newcastle in 2011, where Damien



Damien Duff celebrates his goal against Newcastle

Duff scored the winner in the 67th minute. I was one of the last to leave the stadium. A steward smiled and

*"There's something unique about Fulham. With other clubs, it feels more like a brand"*

said, 'Okay, one more photo and then you have to go!' From kick-off to the end, it was just an amazing experience from the Johnny Haynes Stand. Getting to meet Billy the Badger was quite a highlight, too!

There are many stadiums around the world to see. I realised going back to Craven Cottage would never be a waste of time. Fast forward to March 2018, my girlfriend Elizabeth and I got to experience a stadium tour led by Ed Vanson. Afterwards, it was determined that she needed to see her first Fulham match in the future, while I needed to come back to Craven Cottage for a third time.

There's something unique about Fulham. With other clubs, it feels more like a brand. Granted, I'm a tourist, but the other clubs feel too "touristy". Fulham has a local community feel to it. This is a club for the people. 



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If you'd like to write for the official Fulham fan magazine, send your 500 word submission with a photo of yourself to: [tharvey@pmlmedia](mailto:tharvey@pmlmedia)



FULHAM

# Fulham yet to match Newcastle's valuation of Aleksandar Mitrovic

The Whites are keen on a deal for Mitrovic but so far have failed to match the north-east club's valuation of their player



COMMENTS

By **Ryan O'Donovan**

16:00, 24 JUN 2018





Dear Jonathan

Thanks for signing up with London's original football club.  
I am happy to personally welcome you!

The 2017/18 campaign promises to be an exciting time for everyone connected with Fulham Football Club. Following our Play-Off finish last term, this season there is fresh optimism and a burning desire to be even better.

As a Season Ticket Holder, you've guaranteed to be at the heart of the action, and our goal is to reward you on every occasion for your commitment to our Club and belief in our ability to be the class of the Sky Bet Championship.

On behalf of everyone at Fulham, please know we are dedicated to being a Club that provides more than the 90 minutes of action on the pitch. Just some of the benefits you'll enjoy across the campaign are listed below:

- Guaranteed seat at Craven Cottage for all of the Whites' home league games
- Priority access for away league matches as well as home and away Cup ties
- Subsidised official coach travel to away games
- Access to ticket promotions for friends and family
- Exclusive offers and promotions on Club merchandise across the season
- Games for free! Access to PL2 and Under-18 league matches at Motspur Park or Craven Cottage

I personally look forward to seeing you at Craven Cottage this season. We can't wait to get going, and we're delighted to have you on board!

Shahid Khan  
Chairman

We are Fulham Football Club.

This season, all supporters will receive a new Season Ticket Card. This provides you access to Craven Cottage, and is enclosed in your pack. If your card is missing, please contact the Fulham Ticket Office on 0843 208 1234 (opt. 2).



Prof Jonathan Kotler / 7148 /

1  
1



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## COYW Tee

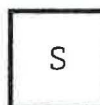
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Blk/Wht/Red

SIZE



M

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XL

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[DESCRIPTION](#)



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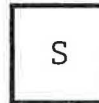
WAS £18.00 / NOW

£7.50

(excl. VAT £6.25)

Grey/Multi

SIZE



M

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DESCRIPTION



DELIVERY & RETURNS



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EVEN NBC refers to them as "The Whites"

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## Rumors: Fulham spree continues with links to Mawson, Herrera, Battaglia

Kyle Bonn, NBC Sports • July 27, 2018



Newly promoted [Fulham](#) has already shelled out nearly \$50 million this summer as [the Whites](#) look to secure Premier League status in the season following promotion via the Championship playoff, but they show no signs of slowing down.

[The Whites](#), led by recruitment chair Tony Khan, have been linked to a host of new players on Friday, including a Mexican international.

Midfielder Hector Herrera, who played every minute of Mexico's 2018 World Cup adventure, has been linked with a move to London. [According to Portuguese outlet Record](#), in a report which has since been [corroborated by The Sun](#) in England, Fulham is chasing the 28-year-old Mexican who currently plays for Portuguese giants FC Porto. The reports state Herrera has a release clause of nearly \$46 million, but that the proposed transfer fee would likely fall well short of that.

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See where your club ranks in survey of most hated teams in the Premier League

102 reactions

7% 68% 25%

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[ MORE: [Friday transfer rumor roundup](#) ]

Herrera has made 70 appearances for the Mexican

# Bienvenido Celta Vigo!

Fulham FC

Tue 7/17/2018 5:43 AM

To: Jonathan Kotler <kotler@usc.edu>;

The Whites welcome La Liga side to Craven Cottage | Tickets on sale now

[View in browser](#)



**BUY ONLINE**

A matchday banner for the Fulham FC vs Celta Vigo match. The banner has a red top and bottom section and a yellow middle section. In the top right corner, it says 'Original' with a small logo. In the center, the text 'VAMOS FULHAM' is written in large, bold letters, with 'VAMOS' in black and 'FULHAM' in red. Below this, the Fulham FC crest and Celta Vigo crest are shown, separated by a small 'v' symbol. Below the crests, the text 'FULHAM FC' and 'CELTA VIGO' are written. At the bottom, in the red section, it says 'PRE-SEASON FRIENDLY Saturday 4th August, 3pm' and 'FULHAMFC.COM/TICKETS'. On the left side, there is a black circle with white text that says 'Adults £21 Juniors £2'.

Dear Jonathan,

Secure your seat for the Whites final warm up game of what promises to be an enthralling 18/19 campaign.

The Whites take on Spanish La Liga side [Celta Vigo](#) at Craven Cottage on **Saturday 4th August**, kick-off 3pm.

You can be there to watch all the action with tickets priced at **£21 for adults** and just **£2 for under-18s\***.

Tickets are available [online](#), over the phone on **0203 871 0810** (opt 1) or in person from the **Fulham Ticket Office**.

*Come On You Whites!*

**Fulham Football Club**

**BUY ONLINE**



**Gold Package**

Enjoy a range of delicious mini dishes alongside a fully inclusive drinks package and watch all the action unfold with Directors' Area seats.

**FIND OUT MORE**



**Executive Suite**

Offering the best views of the pitch alongside the River Thames, an Executive Suite provides exclusive space for you and up to 10 guests.

**FIND OUT MORE**

\*£1 from each ticket sold will go to the Fulham FC Foundation.

All tickets are subject to availability. Terms & Conditions and booking fees apply.

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