EXHIBIT 4

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April 4, 2008

VIA ELECTRONIC MAIL

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Re: Parrish, et al. v. National Football League Players Association, et al., Case No. C07-0943 WHA

Dear Noel:

I am writing in response to our April 2 meet and confer, and your follow-up April 3 letter. Your letter, unfortunately, is filled with factual inaccuracies apparently in an effort to create a diversion from the deficiencies in Plaintiffs' document practices. We will not respond to all of these inaccuracies, but will deal with the most salient points.

To begin with, your repeated references to Plaintiffs' June 2007 document requests are inapposite. As the record and our prior correspondence reflect, those requests -- which were issued before Plaintiffs' initial complaints were dismissed (resulting in claims much narrower than those originally asserted) -- have been superseded by (i) the agreed upon document requests that Defendants fully responded to with their productions prior to the filing of the class certification motion; and (ii) the requests that resulted from our March 6 meet and confer, and that we are currently in the process of producing documents on a rolling basis. Indeed, Defendants insisted, as a predicate for their ability to make an orderly supplemental production, that the scope of that supplemental production be set forth separately from the superseded June 2007 requests. This approach was confirmed in my letter to you dated March 7, 2008. Defendants have never agreed that the June 2007 requests are still open, and never would have agreed to the supplemental requests and production if Plaintiffs had ever asserted that they somehow could request additional documents, beyond the supplemental requests we discussed in the March 6 meet and confer. Any effort by Plaintiffs now to try to go back to the June 2007 requests to obtain additional documents would be wholly unwarranted, and inconsistent with the entire predicate for our discussions concerning the supplemental production that that production would be the remaining comprehensive production.

Furthermore, as I stated before and during the meet and confer, we believe your request for declarations by Defendants regarding preservation of e-mails and websites is premature in light of

Defendants' willingness to provide further information by letter from counsel, the on-going document production by Defendants in connection with the document requests discussed in the March 6 meet and confer, and Plaintiffs' recent document requests served on March 14, 2008 (which largely set forth the requests reviewed in our March 6 meet and confer, and add certain requests to which we will respond consistent with the Federal Rules). As we have also stated, while we believe a declaration from Defendants is neither necessary nor appropriate (and certainly not anything that Plaintiffs can compel under the Federal Rules), we are willing to provide you with information relating to relevant document-related matters in a letter from counsel, as is the usual practice in civil litigations. If you have any follow-up questions after reviewing this letter, let us know and we can provide further information to the extent it is relevant and appropriate. We will address the questions you have raised on a point-by point basis, for the sake of organization.

As we have repeatedly previously advised you in March 2007, June 2007 and during the most recent meet and confer, Defendants have taken steps to preserve their websites. Promptly after this action was filed, counsel instructed appropriate personnel to preserve the websites and have confirmed that this has been done. Defendants have retained copies of all pages that have been on their websites since at least February 26, 2007. It is puzzling that Plaintiffs have chosen to raise this issue now, before Defendants have even had the opportunity to respond to the twenty-three document requests Plaintiffs served on each Defendant on March 14, 2008, which included requests for "All web pages created, modified or hosted by Defendants from February 14, 2003 to the present that describe or refer to retired NFL players."

As to emails, Defendants have taken steps to preserve all employee e-mails. Promptly after this litigation began, counsel instructed Defendants' employees who would be likely to have relevant documents to retain electronic and hardcopy documents. Moreover, since approximately October 2005, a storage server, which is still in place today, has preserved a copy of all e-mails sent or received by Defendants' employees. Additionally, available e-mail files created before the storage server was in place and belonging to current or former employees involved with retired player licensing have been imported onto the storage server from the individuals' computers or Defendants' email servers. This included the e-mail files of Doug Allen, Pat Allen, Dawn Ridley and Howard Skall. As to the monthly e-mail backup tapes created before October 2005, they were created using multiple different types of tape drives that are no longer in use. Additionally, the computers that interfaced with these drives are no longer in use. Furthermore, the backup tapes were created using software from multiple different vendors on different operating system versions that also are no longer in use. Accessing and searching the backup tapes would be unduly burdensome and costly (Fed. R. Civ. P. 26(b)(2)(B)), and the accessibility of any documents on these tapes is not a valid issue given the other means by which Defendants' have preserved potentially relevant documents. Defendants also reject Plaintiffs' assertion that only a "scant" number of emails have been produced. Defendants have had tens of attorneys and paralegals spend hundreds of hours reviewing Defendants' records for relevant documents that are responsive to the requests that have been propounded and agreed upon in this action, and are in the process of having similar such reviews as to Defendants' supplemental requests. The volume of emails produced reflects the amount of such documents located in Defendants' extremely voluminous records after these search efforts, nothing more and nothing less.

As to whether Defendants have a "formal document retention policy," this question is wholly different from whether Defendants have taken reasonable affirmative measures to preserve the documents Defendants had in their files when this litigation commenced, which, as reviewed above, was clearly the case. Indeed, before your supplemental March 14 requests, Plaintiffs had never made a document request seeking the production of any such policy. Consistent with the rolling production in response to these new, recent requests, we will inquire as to your question and get back to you as soon as we have further information.

Regarding the supplementation of productions, as I advised during the meet and confer, Defendants have been including newly identified documents supplementing prior productions in their subsequent productions. As we have previously pointed out, and explained again during the meet and confer, the Plaintiffs' claims are based upon alleged conduct and agreements from before the filing of the Third Amended Complaint (TAC) on November 15, 2007. Moreover, neither Messrs. Parrish or Adderley had GLAs or were members of the retired player association after the filing of the TAC. Thus, Plaintiffs broad request for supplementation of all of their requests with documents created after November 15, 2007 is inappropriate. In contrast, the conduct of Messrs. Parrish and Adderley subsequent to the filing of the TAC is highly relevant to their suitability to serve as class representatives, regardless of when that occurred. Documents created more recently during periods in which Plaintiffs cannot assert claims are not relevant to this action, but Plaintiffs' more recent conduct indicating that they are not qualified to serve as class representatives obviously is relevant. There is no symmetry of relevance as to time periods, and your suggestion that such symmetry exists does not take into account this fact.

Finally, as stated during the meet and confer, Defendants will provide the information required by Paragraph 13 of Judge Alsup's Order. As you know, Defendants are diligently collecting and producing documents on a rolling basis in connection with the requests agreed to at the March 6, 2008 meet and confer. As we have previously advised you, collection of some documents was delayed by our clients' annual meeting which took place shortly after the meet and confer. Defendants are also preparing responses to the twenty-three document requests Plaintiffs served on each Defendant on March 14, 2008, some of which are beyond the scope of the requests discussed and agreed upon in our March 6 meet and confer. Defendants are making every effort to produce documents as quickly as possible, and conduct their discovery practices in accordance with the Federal Rules. Your letter of yesterday, and Plaintiffs' effort to create a diversion from their document production failings, are simply at odds with the record and the facts. If you have any questions about any of the foregoing, let us know.

Very truly yours,

Jason D. Clark

cc: Ronald Katz
Ryan Hilbert

David Feher
David Greenspan
Roy Taub