

EXHIBIT 1

TO DECLARATION OF ROY TAUB IN SUPPORT OF DEFENDANTS' MISCELLANEOUS ADMINISTRATIVE MOTION TO FILE UNDER SEAL

Taub, Roy

From: Hilbert, Ryan [RHilbert@manatt.com]
Sent: Thursday, June 12, 2008 3:09 PM
To: Taub, Roy
Cc: Katz, Ron; Feher, David; Greenspan, David
Subject: Parrish v. NFLPA

Roy:

This responds to your voice mail this morning concerning Defendants' request to file documents under seal in connection with their anticipated motion for summary judgment. Because we have not seen the specific documents and/or testimony Defendants intend to file under seal -- many, if not all, of which were unilaterally designated by Defendants as "Confidential" or "Highly Confidential - Attorneys' Eyes Only" -- we cannot blindly stipulate to Defendants' Request. Nor can we unequivocally state that we will not oppose such Request (as Defendants have previously done in connection with documents submitted by Plaintiffs).

Very truly yours,
Ryan

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