Exhibit J

-----Original Message-----
From: Katz, Ron [mailto:RKatz@manatt.com]
Sent: Tuesday, May 13, 2008 1:15 AM
To: Greenspan, David; Franco, Laura
Cc: Kessler, Jeffrey; Feher, David; lleclair@mckoolsmith.com; Hilbert, Ryan; Cohen, Noel
Subject: RE: Letter re Parrish v. NFLPA (MPP 29749.060)

Dave:

In response to your May 9, 2008 letter to Laura Franco that was attached to your email below, we disagree with your position that there is no justification for Plaintiffs to request, prior to the close of discovery, depositions of witnesses identified by Defendants in their disclosures, particularly in light of the fact that the Court only recently issued its order on class certification. You claim that Plaintiffs were negligent in not having taken more depositions earlier.
However, it would have been premature and wasteful for Plaintiffs to seek time-consuming and costly

depositions of dozens of additional witnesses when it was not known which issues would survive class certification. Indeed, the Court's recent order denying certification to the Retired NFLPA Member class, thus rendering a large number of documents, witnesses and issues no longer relevant to the case, confirms the efficiency of Plaintiffs' approach.

Your complaint regarding the timing of our request is also disingenuous because it was Defendants that wanted the class certification motion to be as close to the end of discovery as possible. Plaintiffs were in favor of an earlier motion schedule in part so that the parties would have ample time to conduct additional discovery focused on those claims that were certified. Moreover, despite Plaintiffs' repeated urging that Defendants produce documents as quickly as possible, it was not until very recently that Defendants finally confirmed that they had produced all documents responsive to certain of Plaintiffs' June 2007 document requests. Indeed, Defendants are still in the process of producing responsive documents.

Regardless of whether Plaintiffs requested these depositions now or three months ago, Plaintiffs faced a ten-deposition limit. While Plaintiffs made clear their belief that ten depositions would not be sufficient, Defendants opposed this position at the same time that they have disclosed, and presumably intend to rely on, the testimony of over thirty witnesses. It would have been imprudent for Plaintiffs to make a motion to increase the deposition limit prior to the Court issuing its order on class certification; if no class were certified, the request would have been moot.

Perhaps most troubling, however, is your misapprehension of the purpose of our May 7 letter, which we thought was explained to you in your May 8 telephone call with Lew LeClair, Ryan Hilbert and me. Contrary to your characterization, Plaintiffs do not wish to create a burdensome deposition schedule near the end of discovery nor to limit Defendants'
ability to identify trial witnesses; Plaintiffs merely wish to avoid trial by surprise. In fact, in response to your stated concern that Defendants have not yet determined whether whom, if any, of the twenty-five undeposed witnesses identified in their disclosures would be called at trial, Mr. LeClair suggested that the parties simply agree to postpone any additional depositions to a time closer to trial when each party's witness list is more definite (a point you fail to mention in your letter). In fact, we believe it would be a reasonable arrangement--one which is likely to be looked on favorably by the Court--for the parties to agree that any person identified as a trial witness by either party be available for at least a half-day deposition prior to trial if that person has not already been deposed. We believe this addresses both Defendants' concerns over scheduling a large number of depositions in a short time as well as Plaintiffs' concerns that they not be taken by surprise at trial. Please let us know whether Defendants agree to this arrangement.

Notwithstanding the foregoing, we understand that Defendants have offered to a "modest increase" in the ten deposition limit. Plaintiffs would like to take the deposition of Steve Saxon of the Groom Law Group and Brig Owens. We trust this will be acceptable to Defendants, especially because Mr. Saxon was not disclosed until after certification of the GLA Class (and after our May 7 letter to you), suggesting that he has information relevant to the class claim and because Mr. Owens appears to be one of a group of several retired players designated by Defendants. Please let us know when Messrs. Saxon and Owens will be available for deposition. We would be willing to stipulate to take them beyond the discovery cut-off if that proves to be the most convenient for all concerned.

Very truly yours,

Ron

From: Greenspan, David [mailto:dgreenspan@DeweyLeBoeuf.com]

Sent: Fri 5/9/2008 3:28 PM
To: Franco, Laura
Cc: Kessler, Jeffrey; Feher, David; lleclair@mckoolsmith.com; Katz, Ron; Hilbert, Ryan; Cohen, Noel
Subject: RE: Letter re Parrish v. NFLPA (MPP 29749.060)

Our response to your letter is attached. Regards.

David Greenspan
Dewey & LeBoeuf LLP
1301 Avenue of the Americas
New York, NY 10019
Direct: +1 212 259 6438
General: +1 212 259 8000
Fax: +1 212 259 6333
www.dl.com <http://www.dl.com/>

From: Holloway, Sonya [mailto:SHolloway@manatt.com] On Behalf Of Franco, Laura
Sent: Wednesday, May 07, 2008 1:51 PM
To: Greenspan, David
Cc: Kessler, Jeffrey; Feher, David; lleclair@mckoolsmith.com; Katz, Ron; Hilbert, Ryan; Cohen, Noel
Subject: Letter re Parrish v. NFLPA (MPP 29749.060)

Dear Greenspan:

Please send attached letter from Laura Franco, Esq.

Sonya Holloway
Secretary to
Laura Franco, Kathryn Bartow & Allen Lee Manatt I Phelps I Phillips
1001 Page Mill Road, Building 2
Palo Alto, CA 94304
Telephone: 650.251.1427
Facsimile: 650.213.0260

and its attachments without reading them or saving them to disk. Thank you

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