Exhibit L

DEWEY & LEBOEUF LLP

Dewey & LeBoeuf LLP
1301 Avenue of the Americas
New York, NY 10019-6092

tel +1 212 259 6438
fax +1 212 259 6333
dgreenspan@dl.com

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BY E-MAIL

Ron Katz
Manatt, Phelps & Phillips, LLP
1001 Page Mill Road, Building 2
Palo Alto, CA 94304

Re: *Parrish, et al. v. NFLPA, et al.* (N.D. Cal. No. C07 0943 WHA)

Dear Ron,

I write in response to your e-mail dated May 13, 2008 (yesterday). As a threshold matter, the timing of the Court's recent decision on Plaintiffs' motion for class certification does not justify Plaintiffs first raising, two weeks prior to the close of fact discovery, the subject of taking up to twenty-five additional depositions. The timing of the Court's decision on class certification is also irrelevant to Plaintiffs' unjustified delay in raising the issue of exceeding the Federal Rules' presumptive limit of ten depositions per side.

Plaintiffs were required to diligently pursue discovery within the deadlines set by the Court. That schedule – including the April 24th class certification hearing date and the May 23rd fact discovery cut-off – was set over five months ago (on December 7, 2007). Plaintiffs cannot now reasonably expect Defendants to accede to Plaintiffs' attempt to radically revamp the Court's schedule simply because class counsel did not want to invest the time or money in taking additional depositions – or even all of its ten allotted depositions – until after the Court decided to certify the GLA Class.

Your position that "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" is particularly incredible given the fact that Plaintiffs strenuously opposed Defendants' request to bifurcate class and merits discovery. Indeed, Defendants would have preferred to have known that the Retired Member Class would not be certified prior to being subjected to the enormous costs and burdens associated with responding to Parrish's claims and discovery requests, but that was not possible under the schedule set by the Court. Notwithstanding Defendants' preferences, they abided by the Court's schedule, and so too must Plaintiffs.

Even though Plaintiffs' stated concerns are entirely of their own creation, Defendants have responded more than reasonably. For example, despite the fact that Plaintiffs never requested the deposition of NFLPA General Counsel Richard Berthelsen prior to your colleague's May 7th letter, we produced

Mr. Berthelsen for deposition just six days later – on May 13th. Defendants have also voluntarily agreed to grant Plaintiffs two depositions above the presumptive ten-deposition limit notwithstanding the delinquency of the request.

In this regard, we will inquire as to Mr. Saxon's availability for a deposition between now and the close of fact discovery. If he is not available during that timeframe, we will agree, as a courtesy, to produce him at a later date. As to Mr. Briggs, as I told you in my last letter, we do not represent him and it is premature to discuss our availability to attend his deposition until Plaintiffs have served Mr. Briggs with a subpoena. That said, we will make ourselves available for any such deposition, and we further agree not to object to Mr. Briggs's deposition on the ground that it will exceed Plaintiffs' ten-deposition limit, or on the ground that it is scheduled after the close of fact discovery.

We will not, however, agree "that any person identified as a trial witness by either party be [made] available for at least a half-day deposition prior to trial if that person has not already been deposed." Although you claim that "Plaintiffs do not wish to create a burdensome deposition schedule near the end of discovery," Plaintiffs' proposal would merely postpone the "burdensome deposition schedule" until the midst of trial preparation. Further, Plaintiffs' proposal would effectively eliminate the Court's fact-discovery cutoff date, and, as indicated above, Defendants will not join in Plaintiffs' attempt to rewrite the Court's schedule.

Finally, in response to your statement that "Plaintiffs merely wish to avoid trial by surprise," I note that Rule 26(a) addresses that issue by requiring parties to timely disclose individuals likely to have discoverable information. As you know, Defendants disclosed sixteen of the twenty-five individuals at issue in June of last year (almost one year ago), and disclosed the nine other individuals at issue in February of 2008 (over three months ago). Thus, the only bona fide "surprise" is that Plaintiffs would wait until two weeks prior to the close of fact discovery period – having taken only three depositions in the past three months – to raise these concerns.

Very truly yours,

D. Gr

David Greenspan