

# Exhibit G

May 7, 2008

Client-Matter: 29749-060

**VIA E-MAIL**

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

**Bernard P. Parrish and Herbert A. Adderley/**  
**NFL Players Association/Players, Inc.**  
**29749-060**

R. Katz	N. Cohen (LA)	K. Hunt
L. Franco	G. Ryland (RSH)	PA Cal.
R. Hilbert	Client (RSH)	

**Re: Bernard Paul Parrish, et al. v. National Football League Players Association and Players Inc, Case No. C07-0943 WHA**

Dear Mr. Greenspan:

I write regarding several discovery matters. First, in their June 7, 2007 Initial Disclosures, Plaintiffs identified Richard Berthelsen, General Counsel of defendant National Football League Players Association, as a person having knowledge of facts relevant to their claims. Plaintiffs wish to take Mr. Berthelsen's deposition. Accordingly, please provide us with Mr. Berthelsen's availability between now and May 23 so that we may schedule a mutually convenient time and location for his deposition. However, because Mr. Berthelsen's deposition may cover topics that overlap with those covered by the recent deposition of Joseph Nahra, Staff Counsel of defendant NFLPA, if Defendants stipulate that they will not call Mr. Berthelsen as a trial witness, Plaintiffs will consider foregoing Mr. Berthelsen's deposition.

Second, in their respective June 6, 2007 Initial Disclosures and joint February 19, 2008 Supplemental Disclosures, Defendants identified, among others, the following persons as having knowledge of facts relevant to the claims and defenses in this case, none of whom have been deposed: Pam Adolph Dee Becker, Karen Bush, Andre Collins, Andrew Feffer, Josh Goodstadt, Angela Manolakas, Muneer Moore, Corrine Murphy, Dawn Ridley, Dexter Santos, Lashun Lawson, David Suber, Clay Walker, Seth Wyman, Steve Byrd (STATS, Inc.), Linda Castillon (Fathead, Inc.), Christine Finch (Todd McFarlane Entertainment), Adam Sullins (The Upper Deck Company), Dan Goich, Eric Hipple, Mike McBath, Brig Owens, Leonard Wheeler. In an effort to streamline the discovery remaining and, ultimately, trial in this matter, please identify those above-named individuals that Defendants will stipulate shall not be called as a trial witness in Defendants' case-in-chief. For each of the remaining individuals, please provide us (1) his or her availability for deposition between now and May 23 (in the case of Defendants' current and

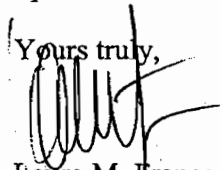
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former employees) or (2) your availability to attend a deposition between now and May 23 (in the case of third-party witnesses).<sup>1</sup>

Finally, as you know, Plaintiffs' position as set forth in the June 7, 2007 Joint Case Management Statement is that each side be permitted to take 20 depositions (excluding expert depositions). Accordingly, to the extent that Defendants' failure to agree to the proposed stipulation necessitates depositions in excess of the number allotted, Plaintiffs hereby request Defendants' consent to such additional depositions. If Defendants do not consent to these additional depositions, Plaintiffs shall seek the Court's approval.

Please provide your response to the above points no later than Thursday, May 8, 2008.

Yours truly,



Laura M. Franco  
Manatt, Phelps & Phillips, LLP

LMF.sh

cc: Jeffrey L. Kessler, Esq.  
David G. Feher, Esq.  
Lewis T. LeClair, Esq.  
Ronald S. Katz, Esq.

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<sup>1</sup> We further expect that you will provide us immediately with the address and telephone number of each of the five retired NFL players identified in Defendants' Supplemental Disclosures should Defendants fail to stipulate that these individuals will not be called as trial witnesses. *See* Fed. R. Civ. P. 26(a)(1)(A)(i).