

EXHIBIT 13

Case No. C 07 0943 WHA

Parrish v. National Football League Players Association, et al.

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May 20, 2008

BY ELECTRONIC MAIL

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

Dear Ryan:

I write in response to your letter, dated May 16, 2008, to my colleague David Greenspan regarding Players Inc's Responses and Objections to Plaintiffs' Second Request for Production of Documents and NFLPA's Responses and Objections to Plaintiffs' Third Request for Production of Documents, which Defendants served on April 14, 2008. The specific issues raised in your letter are addressed below. In light of Plaintiffs decision to wait more than a month, until one week before the close of discovery, to raise these issues, please let us know as soon as possible which issues you believe remain unresolved and let us know when you would like to meet and confer to address them.

Document Request No. 27 to Players Inc and Request No. 29 to the NFLPA

Defendants have agreed to produce documents describing the organization and policies of the Retired Player Department in connection with retired player licensing. Defendants objected to the term "purpose" because it is unclear what additional types of documents would be covered by that term that are not already covered by the terms organization and policies. To be clear, however, this objection does not have the practical effect of limiting our production. So that there can be no confusion on this point, Defendants hereby agree to produce documents sufficient to describe the "organization or purpose" of the Retired Players Department.

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Document Request No. 28 to Players Inc and Request No. 30 to the NFLPA

Plaintiffs request for "all documents and/or communication that summarize, describe or refer to any criteria for inclusion of any retired player in the database" is overly broad and unduly burdensome because it seeks retired player information in the database unrelated to retired player group licensing. However, to the extent documents summarizing, describing or referring to the criteria for including a retired player in the database in connection with retired player group licensing exist, Defendants will produce such documents.

Plaintiffs' request for a list of retired players is overly broad, vague and ambiguous. The database is an ongoing system which includes information maintained from a variety of sources and is maintained for a variety of purposes regarding active, inactive and retired players and other matters. Each database record does not necessarily specify "each year" a player was included in the database, nor does it necessarily specify whether a particular record is for a retired, active or inactive player. Moreover, the information in the database is not solely related to retired player licensing. Thus, Defendants have reasonably agreed to provide Plaintiffs with documents showing the type of data available in the database regarding retired players. Defendants are willing to provide more information from the database, but Plaintiffs need to be more specific than "a list of all retired players who have appeared in the database for each year."

Document Request No. 31 to Players Inc and Request No. 33 to the NFLPA

Defendants have agreed to produce documents related to the practice by which monies paid to retired players could be applied against the "Active Usage Credit" referenced in paragraph 14 of the NFL Sponsorship Agreement. Plaintiffs' request sought documents relating to the negotiations of this agreement, which have nothing to do with Plaintiffs' claims in this case, and did not seek documents, as stated in your letter, regarding Plaintiffs' allegation "that retired player rights are included in the NFL Sponsorship and Internet Agreement." Thus, there is no basis for Plaintiffs to raise any inferences or preclude Defendants from offering evidence in any way as to this matter. Nevertheless, to the extent that documents described in your letter exist, Defendants will produce them (although Defendants are presently of the belief that no such documents exist).

Document Request Nos. 35, 36, 37, 38 and 40 to Players Inc and Request Nos. 37, 38, 39, 40 and 42 to the NFLPA

Regarding Request Nos. 35, 37 and 38 to Players Inc and the corresponding Requests to the NFLPA, Defendants raised valid objections to Plaintiffs requests and, in accord with Judge Alsup's Order, agreed to produce "all documents otherwise responsive." The requests are overly broad, unduly burdensome and seek documents which are neither relevant nor reasonably calculated to lead to discovery of admissible evidence by seeking documents from outside the statute of limitations, unrelated to retired player licensing and/or regarding administrative

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matters. Nonetheless, subject to and without waiver of their objections, Defendants agree to remove the term "otherwise" from the responses to these requests.

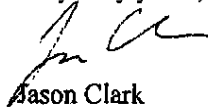
As we advised you in our letter, dated May 14, 2008, because Plaintiffs have indicated that they are not planning on pursuing Mr. Parrish's claims, Defendants do not intend to produce any documents in response to Request No. 36 to Players Inc and the corresponding Request to the NFLPA.

Regarding Request No. 40 to Players Inc and the corresponding Request to the NFLPA, Plaintiffs' Request 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" is also overly broad, unduly burdensome and seeks documents which are neither relevant nor reasonably calculated to lead to discovery of admissible evidence because it seeks documents unrelated to retired player licensing. Subject to and without waiver of their objections and except as described below, Defendants agree to remove the term "otherwise" from their responses to these requests. To be clear, Defendants will only produce web pages that describe or refer to retired NFL players in connection with retired player licensing.

Status of Production

Defendants have made three rolling productions in April and May, including most recently on May 16, 2008. Defendants have been working extremely diligently to complete such production, and the timing is the product of Plaintiffs having waited until the end of fact discovery to serve Defendants with two sets of 23 additional document requests. Nevertheless, Defendants expect to complete their production by the close of discovery on May 23, 2008 and comply with Paragraph 13 and 14 of Judge Alsup's Supplemental Standing Order.

Very truly yours,



Jason Clark

cc: Ron Katz
Noel Cohen
David Feher
David Greenspan
Roy Taub