

EXHIBIT E

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Clerk, U.S. District and
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**LAW OFFICES OF
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October 7, 2008

BY EMAIL & FIRST CLASS MAIL

William K. Meyer, Esq.

Zuckerman Spaeder, LLP

100 East Pratt Street, Suite 2440

Baltimore, MD 21202-1031

Re: Sagapolutele, et al. v. The Bert Bell/Pete Rozelle NFL
Retirement Plan, et al.
Civil Action No. WMN-08-1870

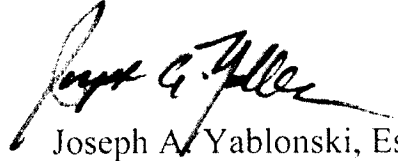
Dear Mr. Meyer:

I have your letter of earlier today. I will attach it to the Motion to Quash that will be filed in Washington, D.C. later today or tomorrow. Your letter ignores the fact that Plaintiffs have insisted that the National Football League Players Association ("NFLPA") waive its rights under Rule 45(c) to challenge the subpoena in the Court from which it was issued. The NFLPA will not do so. You also ignore the fact that Plaintiffs have agreed to defer the deposition and document production of the NFL Management Council until the Court in Baltimore rules on the Plan's motion for a protective order. All that the NFLPA has asked is that the subpoena served on it be withdrawn and re-issued later **if** the Court in Baltimore permits discovery beyond the administrative record. I have even proposed that I will accept service of that subpoena and agree to an accelerated schedule **if** discovery is permitted. Because Plaintiffs have refused those terms and insisted that the NFLPA go forward without documents at a deposition next Monday, further discussion would be fruitless despite our best efforts to avoid satellite subpoena litigation. Unless Plaintiffs relent from their brinksmanship, you leave me no choice but to file a motion to protect my client from this oppressive subpoena.

The NFLPA will not be presenting any witnesses on October 13, 2008, unless the Court rules on its Motion by that date. Please also be advised that I will be working on a privilege log and will serve it as soon as it is completed.

William K. Meyer, Esq.
October 7, 2008
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Sincerely,

A handwritten signature in black ink, appearing to read "Joseph A. Yablonski". The signature is fluid and cursive, with a long horizontal stroke at the end.

Joseph A. Yablonski, Esq.

cc: Hisham M. Amin, Esq.
Nathan Oleson, Esq.
Tom DePaso, Esq.