## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

NATIONAL FOOTBALL LEAGUE PLAYERS
ASSOCIATION,

Movant

v.

Case No. 1:08-mc-00653-RMU
(pending in the District of Maryland as Case No. 08-01870 WMN)

\*

Respondents.

\*

# RESPONDENTS' MOTION TO COMPEL PRODUCTION OF DOCUMENTS

Respondents Pio Sagapolutele, Sean Lamar Smith, and Bruce Schwager, move pursuant to Fed.R.Civ.P. 45(c)(2)(B)(i) for an order compelling movant, the National Football League Players Association ("NFLPA"), to produce documents set forth in a deposition subpoena *duces tecum* served on the NFLPA on September 15, 2008. Respondents incorporate by reference their combined Memorandum in support of (1) Respondents' Opposition to the Motion to Quash filed by the NFLPA; and (2) this Motion to Compel Production of Documents.

Dated: October 22, 2008

Cyril V. Smith
D.C. Bar No. 413941
William K. Meyer
Motion for Admission *Pro Hac Vice* Pending
Zuckerman Spaeder LLP
100 East Pratt Street, Suite 2440
Baltimore, MD 21202

#### (410) 332-0444

#### Attorneys for Respondents

### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 22<sup>nd</sup> day of October 2008, a copy of the foregoing Motion to Compel Production of Documents and supporting Memorandum and exhibits were served by email and first class mail, postage prepaid, upon the following:

Joseph A. Yablonski Joseph A. Yablonski, P.L.L.C. 1776 K Street, N.W. Suite 840 Washington, DC 20006

Hisham M. Amin Groom Law Group, Chartered 1701 Pennsylvania Avenue, N.W. Suite 1200 Washington, DC 20006

/s/ Syril V. Smith