

**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)

PIO SAGAPOLUTELE, *et al.*, \*

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

\_\_\_\_\_  
/s/  
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

