

CIVIL DISTRICT COURT
PARISH OF ORLEANS
STATE OF LOUISIANA

NO. 2019-1226

DIVISION: "J-15"

ANTONIO LE MON, A PROFESSIONAL LAW CORPORATION, SUSAN S.
BOUDREAUX, AND JANE N. PREAU WIFE OF/AND WILLIAM J. PREAU, III,
M.D.

VERSUS

NATIONAL FOOTBALL LEAUGE, ROGER GOODELL, IN HIS OFFICIAL
CAPACITY AS COMMISSIONER OF THE NATIONAL FOOTBALL LEAGUE, NFL
PROPERTIES LLC, AS SUCCESSOR-IN-INTEREST TO NFL PROPERTIES, INC.

FILED: _____

DEPUTY CLERK

INTERROGATORIES, REQUESTS FOR PRODUCTION OF
DOCUMENTS AND REQUESTS FOR ADMISSION OF FACT

NOW COMES ANTONIO LE MON, A PROFESSIONAL LAW CORPORATION,
PETITIONER, who submits the following interrogatories, requests for production of
documents, and requests for admissions of fact to the National Football League
Commissioner Roger Goodell, defendant herein, for timely written response under
oath by an authorized representative by resolution attached to all responses, with the
aforesaid written responses delivered and with regard to requests for production of
documents provide exact reproduction of and/or timely produce any materials the
subject matter and fully responsive thereof for inspection and reproduction, as
mandated under law, to the ANTONIO LE MON, A PROFESSIONAL LAW
CORPORATION, 512 East Boston Street, Covington, LA 70433 as follows:

INSTRUCTIONS:

1. Each interrogatory, request for production of documents and requests for admissions of fact shall be responded to in writing and as to interrogatories and requests for admissions of fact and in full compliance with the Louisiana Discovery laws as set forth in La. C. Civ. P. art. 1420 et. seq. ("Louisiana Discovery");
2. "You" means the NFL and its Commissioner Roger Goodell and any of the NFL employees, agents, independent contractors, volunteers, or anyone else who

have ownership in the NFL or the NFL and/or Commissioner Goodell directs or supervises;

3. To the extent that you make any objection in response to an interrogatory, request for production of documents, and/or request for admission of fact, you are to describe the objection with exactitude and the legal basis for that objection and identify the specific documents or information of which you are objecting to its production in full compliance with;
4. Interrogatories and Requests for Admissions of Fact are continuing in nature and require timely supplemental response thereto as additional information and materials the subject matter of that discovery become available or any response requires correction or supplementation in full compliance with Louisiana Discovery;
5. Any responses by you which state that the information and/or materials are lost, cannot be located, or are otherwise presently unavailable shall provide factual details and sufficient background to explain any delay or inability to produce that information and/or materials;
6. If you claim that any information or documentation cannot be produced due to attorney-client privileged communications or attorney work-product, please identify the attorney(s) involved in that communication or work-product, the date of the communication or creation of the work product, and state with specificity by date, subject matter, and description any such information or work product not produced and the legal basis thereof;
7. To the extent that you claim that any information or tangible or electronic material constitutes a trade secret, please describe each such item with particularity and the legal basis for which it constitutes a trade secret. Any such trade secrets can be produced subject a confidentiality agreement executed and terms agreed upon by all parties or the NFL must immediately seek a protective order as to those alleged trade secrets.

8. The term "No-Call" as used throughout this discovery shall relate to the play in the National Football Conference(hereinafter "NFC") Championship game between the New Orleans Saints and the Los Angeles Rams on 20 January 2019 at the Mercedes-Benz Superdome in New Orleans, Louisiana where with approximately less than two minutes in regulation in the 4th Quarter of the aforesaid game New Orleans Saints Quarterback Drew Brees threw a pass in the direction of New Orleans Saints Wide Receiver TommyLee Lewis with Los Angeles Rams cornerback Nickell Robey-Coleman and for which Nickell Robey-Coleman from information and belief received a fine from the NFL.

INTERROGATORY NO. 1:

Please provide the full names, addresses, and contact numbers of all referees and umpires of the NFL who were present during the "No Call" play and state with specificity the exact location where each identified umpire and referee was located and the exact nature of what they were observing from the exact moment of first contact after New Orleans Saints Quarterback Drew Brees ("Brees") released the football until the play was completed.

INTERROGATORY NO. 2:

Are you in possession or have you ever been in possession of or directed anyone to secure any statements (written, hand-written, electronic, verbally or other form of recordation or capture) and/or have you received information from any of the NFL officials (referees or umpires) that were part of the NFC Championship game officiating crew regarding in any way the "No Call" play, including but not limited to the following individuals: Bill Vinovich; Bruce Stritesky; Patrick Turner; Rusty Baynes; Tom Hill; Gary Cavaletto; and/or Todd Prukop (hereinafter the "NFC Officiating Crew"). If so, please identify each such statement with particularity by date created, who secured that statement, and the reason or purpose for which it was secured.

INTERROGATORY NO. 3:

Have you or anyone at your direction conducted any internal or outside investigation in any way relating to the "No Call" Play or as to the selection, participation or

performance of duties of any member of the NFC Officiating Crew with regard to the officiating of the NFC Championship game of 20 January 2019 ("NFC Championship game"). If so, for each such investigation, please provide all such records, written, electronic or otherwise, in any way connected with the request for, the investigation of, and any findings and conclusions.

INTERROGATORY NO. 4:

Please state whether or not you have generated any documentation, written, electronic or otherwise, in which you or anyone at your direction, prepared any analysis of estimated gross and/or net revenue from ticket and merchandise sales, sponsorships, commercial advertising or otherwise directly and/or indirectly to the NFL for the Superbowl on 3 February 2019 and any such estimates of gross and/or net revenue or other benefit of any kind to the NFL in the event that the NFC Champion was: (1) the Los Angeles Rams; and (2) the New Orleans Saints. If so, please provide the details of each such report with particularity, including the date and/or time period of the creation of each such analysis.

INTERROGATORY NO. 5:

Please state the top three states in the United States that are presently the focus of your market strategy for the marketing and sale of NFL merchandise of any kind and increase in attendance of games.

INTERROGATORY NO. 6:

State with specificity what NFL player rule violations were committed by Los Angeles Rams cornerback Nickell Robey-Coleman during the "No Call" Play. For each such violation, please state whether any member of the NFC Officiating Crew observed that violation? If no member of the NFC Officiating Crew observed any such violation to your knowledge or information, please state your understanding of the reason(s) why those violations were not observed by the NFC Officiating Crew as to each such member.

INTERROGATORY NO. 7:

Was NFL Commissioner Roger Goodell watching the NFC Championship Game on 20 January 2019 in live time when the "No Call" occurred? If so, please give the details of where he was watching the game at that time. If not, please state the details of Commissioner Goodell's activities at the time of the "No Call". Further, state whether or not any discussions of any kind took place between the NFL Commissioner Roger Goodell and anyone immediately and/or prior to the end of the game in overtime and prior to the players exiting the field of the Mercedes-Benz Superdome after the "No Call" play with regard to: the details of what happened and/or whether any player rule violation had occurred in the play; whether the game should be delayed or suspended to levy or issue a player rule violation against Nickell Robey-Coleman and/or the Los Angeles Rams for any player rule violation; whether the New Orleans Saints should be declared the winner of the game; or whether the game should be otherwise altered or modified to address the failure of call any player rule violation arising from the "No Call" play. If your answer is "Yes", please provide all such details. If your answer is "No", please provide the reason(s) for which no such corrective action was contemplated and/or taken by the NFL and/or its Commissioner Roger Goodell. If such corrective action was contemplated at any time after the players departed the field of the Mercedes-Benz Superdome after the NFC Championship overtime period, please give all such details of discussions of taking such corrective action and/or provide the reasons that no such discussions of taking corrective action did not take place.

INTERROGATORY NO. 8:

Did the NFL and/or Commissioner Roger Goodell have the authority to take any corrective action to declare the New Orleans Saints the winner of the NFC Championship game on 20 January 2019 after the "No Call" Play or to request and/or require that the New Orleans Saints and the Los Angeles Rams play another game or some modified game to determine the team to play in the Super Bowl on 3 February 2019? If so, what rules or regulations so empowered the NFL and/or Commissioner

Goodell and the reason(s) in detail why any such rule or regulation was not exercised. If not, please explain why no such rule or regulation was in effect on 20 January 2019.

INTERROGATORY NO. 9:

Please explain the details of how each member of the NFC Officiating Crew was chosen for the NFC Championship game. Did the NFL have any rules or regulations that prohibited that would have prohibited any member of the NFC Officiating Crew to reside in the State or within a certain geographic territory from any team playing in that game. If not, why was no such rule or regulation in place prior to 20 January 2019? Please identify the city and state of home residence of each member of the NFC Officiating Crew as of 20 January 2019.

INTERROGATORY NO. 10:

How many NFL referees and umpires were employed by the NFL on 20 January 2019? Please state the names, addresses, contact number and cities and states of residence of each such referee and umpire and identify all scoring or grading otherwise of each of referee and umpire from which you determined the composition of the NFC Officiating Crew setting forth the details of the process of those selections, identifying all NFL personnel who made the selections. Were there sufficient number of referees and umpires who lived in neither California or Louisiana to have officiated the NFC Championship game? Did you ever have any concerns that your officiating crews should not have their current residency in the state of any NFL teams competing against each other in any game, regular season or playoff?

INTERROGATORY NO. 11:

Did Commissioner Roger Goodell observe any infraction in live time by Los Angeles Rams cornerback Nickell Robey-Coleman against New Orleans Saints wide receiver Tommy Lee Jones during the "No Call" play? If not, what was he doing at that time? If so, why did Commissioner Goodell not immediately and temporarily suspend play of the game to correct or at least discuss whether a player rule infraction should be called or that Commissioner Goodell take other corrective action? If so, why did Commissioner Goodell not take any corrective action before the end of the overtime

period, before the players left the Mercedes Benz Superdome on 20 January 2019, or at any time thereafter to declare the New Orleans Saints as the winner of the game or to call a new or modified game against the two teams to allow the New Orleans Saints the chance to still be the NFC Champions in the Super Bowl on 3 February 2019.

INTERROGATORY NO. 12:

Has any disciplinary action been taken against any member of the NFC Officiating Crew for any failures in the performance of their duties in the NFC Championship game? If not, why not? If so, please provide the details of all such disciplinary action? Did any member of the NFC Officiating crew act as an umpire or referee or a member of the officiating crew in the Super Bowl on 3 February 2019? If so, please provide the details of how that member of the NFC Officiating Crew came to be selected. Have the members of the NFC Officiating Crew been evaluated and/or scored in their performance at the NFC Championship game? If so, please provide the details of that evaluating and scoring and the results thereof as to each such member. If not, why haven't such evaluations or scorings of performance taken place to date.

INTERROGATORY NO. 13:

Did the NFL/Commissioner Goodell find that any of player infraction(s) by Los Angeles Rams cornerback Nickell Robey-Coleman during the "No Call" play was/were blatant or at least easily visible to at least one member of the NFC Officiating Crew? If so, how do you explain in detail your belief or any explanation given to you as to how each member of the seven member crew comprising the NFC Officiating Crew failed to observe any of those player infractions?

INTERROGATORY NO. 14:

Have you and/or any expert at your request reviewed and analyzed the replay of the "No Call" play at the request of the NFL and/or Commissioner Goodell? If so, please identify all such NFL personnel and/or experts by full name, title, address and contact information and state the results of each such review and analysis, including recommendations thereof. If so, is it believed that any of the members of the NFC

Officiating Crew out of the position or otherwise deficient in the duties assigned to them during the "No Call" play?

INTERROGATORY NO. 15:

Did the NFL directly employ, train, supervise and/or assign games to each member of the NFC Officiating Crew and/or other NFL referees and umpires? If so, please provide the details of such employment, training, supervision and assignments as to each member of the NFC Officiating Crew for the past five (5) years.

INTERROGATORY NO. 16:

Does the NFL represent to the general public that its referees and umpires for its games are highly trained and are assigned the duty to fairly and impartially enforce the NFL rules of the game and to penalize for observed player infractions of those rules? If so, please provide the details of and describe all written, website, and other forms of such representation? Does the NFL represent to the general public that its referees and umpires are to enforce the NFL rules of the game to best ensure that the correct winner is declared in each NFL game? If so, please provide the details and describe all written, website and other forms of such representation?

INTERROGATORY NO. 17:

Do you believe that any of member of the NFC Officiating Crew did knowingly observe an infraction of the rules of player conduct by Los Angeles Rams cornerback Nickell Robey-Coleman at the time of the "No Call" play but nonetheless chose not to call a penalty against him/the Los Angeles Rams? If so, how did you arrive at that conclusion and what was the reason(s) for the conscious failure not to call a penalty?

INTERROGATORY NO. 18:

Immediately after the "No Call" play ended, there is a video capture of Down Judge Patrick Turner appearing to be reaching for his yellow "penalty" flag? Have you questioned Patrick Turner regarding that video footage? If so, what was his explanation for apparently reaching for his yellow "penalty" flag and what was his explanation of why he did not ultimately pull it and enforce an infraction? What is your interpretation of what the segment of video capture depicts?

INTERROGATORY NO. 19:

Immediately after the "No Call Play" ended, there is a video capture of Side Judge Gary Cavaletto appears to be moving towards Down Judge Patrick Turner and gesturing with his arms/hands to stop from pulling out and releasing his yellow "penalty" flag? Have you questioned Gary Cavaletto about that video footage? If so, what was his explanation for apparently making this gesture with his arms/hands? Does Side Judge Gary Cavaletto claim that he observed the activity of Nickell Robey-Coleman during the "No-Call" play and that he was confident that no infraction had taken place? If not, please explain what he believed with regard to any player infraction taking place during that play?

INTERROGATORY NO. 20:

Please state where each members of the NFC Officiating Crew were looking at the exact moment of the Nickell Robey-Coleman infraction(s) during the "No-Call" play and the basis of those beliefs?

INTERROGATORY NO.21:

Did Los Angeles Ram cornerback Nickell Robey-Coleman receive any fines or disciplinary action as a result of his conduct in the "No-Call" play? If so, please give the details of that player's infractions and state the NFL personnel and basis for issuing any fines or disciplinary action?

INTERROGATORY NO. 22:

Has the NFL and/or Commissioner Roger Goddell done anything to mitigate any loss to the New Orleans Saints' fans or Who Dat Nation for the failure of the NFC Officiating Crew to not penalize Los Angeles Rams cornerback Nickell Robey-Coleman for any player infractions after the "No-Call" play and the consequences thereof, including to apologize to the Who Dat Nation? If not, why has no apology or other form or reparation been made to date? Do you believe that some members of the Who Dat Nation, and specifically some of those members who purchased tickets to the NFC

Championship game suffered emotional distress because of the "No Call" play? Do you believe that that emotional distress cannot be mitigated by the NFL at this point? Do you concede that more probably than not the New Orleans Saints lost the opportunity to play in the Super Bowl on 3 February 2019 because of the "No Call" play? If so, do you then concede that the New Orleans Saints' fan base lost the opportunity to enjoy winning the NFC Championship, the opportunity to enjoy the Super Bowl experience in Atlanta, Georgia in the context of their team playing in that game, and the opportunity to play for the world championship of football and the enjoyment of winning a world championship and post-victory celebrations? If not, why not?

INTERROGATORY NO. 23:

Do you believe that had the NFC Officiating Crew to call any penalty against Los Angeles Rams Nickell Robey-Coleman and/or the Los Angeles Rams because of the infraction(s) he committed that the New Orleans Saints would have more likely than not won the NFC Championship game or that the New Orleans Saints chances of winning the NFC Championship game would have more likely than not been significantly higher in percentage chance? Please explain your answer.

INTERROGATORY NO. 24:

Do you believe that at least one member of the NFC Officiating Crew was in a position and situated during the "No Call" play to have easily been able to observe at least one player infraction by Los Angeles Rams cornerback Nickell Robey-Coleman. If so, how do you explain that referees or umpires failure to call any penalty?

INTERROGATORY NO. 25:

Were the NFC Officiating Crew acting at all times within the course and scope of their employment with the NFL at all times from the inception of the "No-Call" play until the completion of the NFC Championship game? If not, please explain your response in detail.

INTERROGATORY NO. 26:

Do you believe that technology existed at least six months prior to 20 January 2019 to allow for video capture and review of clearly visible infractions or violations of player rules by NFL players during NFL games that were not called by NFL umpires or referees? If so, can you give any reason(s) that such technology has not been implemented by the NFL to at least ensure that the failure of the NFC Officiating Crew to call any penalty during or immediately after the "No Call" play in the NFC Championship game could be reviewed by NFL officials in the upstairs booth and a penalty called before resumption of play? Did the NFL fail to provide any mechanism whatsoever to have allowed for the immediate imposition of any player conduct penalty against Los Angeles Rams cornerback Nickell Romey-Coleman/the Los Angeles Rams as a result of his conduct during the "No Call" play after the NFC Officiating Crew failed to recognize any penalty? If not, what mechanism(s) were available to the NFL and/or its Commissioner and provide the reasons for which each such mechanism was not utilized at that time or at any time prior to the Super Bowl on 3 February 2019 by the NFL under those circumstances?

INTERROGATORY NO. 27:

Was one of the reasons that the NFL and/or Commissioner Goodell did not call for the replay game of the NFC Championship after 20 January 2019 was because it would delay the Super Bowl on 3 February 2019 and it would thereby cost the NFL and its 32 owners millions of dollars as a consequence thereof?

INTERROGATORY NO. 28:

Should those individuals who purchased tickets to the NFC Championship game had reasonably expected that the referees and umpires would enforce the player rules of conduct during the game and that those referees and umpires would issue penalties to a competing team for infractions observed by those referees and umpires? Would such a reasonable expectation arise in part because of the marketing and/or representations made to the general public by the NFL and/or Commissioner Goodell that its officials

will enforce its observations of violations of player conduct during the game in an impartial manner?

INTERROGATORY NO. 29:

Please identify by full name, address, employer, and telephone number, of all known individuals, members of the press, entities, and NFL employees or contractors who it is believed took photographs, videos, or otherwise captured any portion of the NFC Championship game and the sidelines and any members of the NFC Officiating Crew during the game.

INTERROGATORY NO. 30:

Please identify by full name, address, telephone number and job title of any and employees of the NFL who were attending the NFC Championship game. For each individual listed, please provide a detailed description of the purpose of which they were attending the game. Of those NFL employees listed, please identify those whose function was to video tape, photograph or otherwise capture any image of the "No Call" play or any portion of the sidelines, within 20 yards of the backfield of the New Orleans Saints and end zone in which the New Orleans were attempting to score at the time of the "No Call" play and the position on or off the field of any member of the NFC Officiating Crew at any point during the "No Call" play. Please separately identify of those NFL employees who did in fact video tape, photograph, or otherwise capture any image of the "No Call" play or any portion of the sidelines, within 20 yards of the backfield of the New Orleans Saints and end zone in which the New Orleans were attempting to score at the time of the "No Call" play and the position on or off the field of any member of the NFC Officiating Crew at any point during the "No Call" play.

INTERROGATORY NO. 31:

Please identify all individuals and legal entities by name, telephone number, contact person, email and other contact information who you are aware that have any video tape, photograph or otherwise capture any image of the "No Call" play or any portion of the sidelines, within 20 yards of the backfield of the New Orleans Saints and end

zone in which the New Orleans were attempting to score at the time of the "No Call" play and the position on or off the field of any member of the NFC Officiating Crew at any point during the "No Call Play".

INTERROGATORY NO. 32:

At what point after the "No Call" play do you contend that it was not longer possible, or at least practical, to be able to take any form of corrective action because of the "No call" play which would have allowed the New Orleans the possibility of playing in the Super Bowl on 3 February 2019. Please give a detailed explanation of your response.

REQUEST FOR PRODUCTION NO. 1:

Please produce any and all records, writings, videos, electronic records and transmissions, reports, and any other evidence, tangible or otherwise, in any way relating to subject of Interrogatory 1 and your responses thereto.

REQUEST FOR PRODUCTION NO. 2:

Please produce any and all records, writings, videos, electronic records and transmissions, reports, and any other evidence, tangible or otherwise, in any way relating to subject of Interrogatory 2 and your responses thereto.

REQUEST FOR PRODUCTION NO. 3:

Please produce any and all records, writings, videos, electronic records and transmissions, reports, and any other evidence, tangible or otherwise, in any way relating to subject of Interrogatory 3 and your responses thereto.

REQUEST FOR PRODUCTION NO. 4:

Please produce any and all records, writings, videos, electronic records and transmissions, reports, and any other evidence, tangible or otherwise, in any way relating to subject of Interrogatory 4 and your responses thereto.

REQUEST FOR PRODUCTION NO. 5:

Please produce any and all records, writings, videos, electronic records and transmissions, reports, and any other evidence, tangible or otherwise, in any way relating to subject of Interrogatory 5 and your responses thereto.

REQUEST FOR PRODUCTION NO. 6:

Please produce any and all records, writings, videos, electronic records and transmissions, reports, and any other evidence, tangible or otherwise, in any way relating to subject of Interrogatory 6 and your responses thereto.

REQUEST FOR PRODUCTION NO. 7:

Please produce any and all records, writings, videos, electronic records and transmissions, reports, and any other evidence, tangible or otherwise, in any way relating to subject of Interrogatory 7 and your responses thereto.

REQUEST FOR PRODUCTION NO. 8:

Please produce any and all records, writings, videos, electronic records and transmissions, reports, and any other evidence, tangible or otherwise, in any way relating to subject of Interrogatory 8 and your responses thereto.

REQUEST FOR PRODUCTION NO. 9:

Please produce any and all records, writings, videos, electronic records and transmissions, reports, and any other evidence, tangible or otherwise, in any way relating to subject of Interrogatory 9 and your responses thereto.

REQUEST FOR PRODUCTION NO. 10:

Please produce any and all records, writings, videos, electronic records and transmissions, reports, and any other evidence, tangible or otherwise, in any way relating to subject of Interrogatory 10 and your responses thereto.

REQUEST FOR PRODUCTION NO. 11:

Please produce any and all records, writings, videos, electronic records and transmissions, reports, and any other evidence, tangible or otherwise, in any way relating to subject of Interrogatory 11 and your responses thereto.

REQUEST FOR PRODUCTION NO. 12:

Please produce any and all records, writings, videos, electronic records and transmissions, reports, and any other evidence, tangible or otherwise, in any way relating to subject of Interrogatory 12 and your responses thereto.

REQUEST FOR PRODUCTION NO. 13:

Please produce any and all records, writings, videos, electronic records and transmissions, reports, and any other evidence, tangible or otherwise, in any way relating to subject of Interrogatory 13 and your responses thereto.

REQUEST FOR PRODUCTION NO. 14:

Please produce any and all records, writings, videos, electronic records and transmissions, reports, and any other evidence, tangible or otherwise, in any way relating to subject of Interrogatory 14 and your responses thereto.

REQUEST FOR PRODUCTION NO. 15:

Please produce any and all records, writings, videos, electronic records and transmissions, reports, and any other evidence, tangible or otherwise, in any way relating to subject of Interrogatory 15 and your responses thereto.

REQUEST FOR PRODUCTION NO. 16:

Please produce any and all records, writings, videos, electronic records and transmissions, reports, and any other evidence, tangible or otherwise, in any way relating to subject of Interrogatory 16 and your responses thereto.

REQUEST FOR PRODUCTION NO. 17:

Please produce any and all records, writings, videos, electronic records and transmissions, reports, and any other evidence, tangible or otherwise, in any way relating to subject of Interrogatory 17 and your responses thereto.

REQUEST FOR PRODUCTION NO. 18:

Please produce any and all records, writings, videos, electronic records and transmissions, reports, and any other evidence, tangible or otherwise, in any way relating to subject of Interrogatory 18 and your responses thereto.

REQUEST FOR PRODUCTION NO. 19:

Please produce any and all records, writings, videos, electronic records and transmissions, reports, and any other evidence, tangible or otherwise, in any way relating to subject of Interrogatory 19 and your responses thereto.

REQUEST FOR PRODUCTION NO. 20:

Please produce any and all records, writings, videos, electronic records and transmissions, reports, and any other evidence, tangible or otherwise, in any way relating to subject of Interrogatory 20 and your responses thereto.

REQUEST FOR PRODUCTION NO. 21:

Please produce any and all records, writings, videos, electronic records and transmissions, reports, and any other evidence, tangible or otherwise, in any way relating to subject of Interrogatory 21 and your responses thereto.

REQUEST FOR PRODUCTION NO. 22:

Please produce any and all records, writings, videos, electronic records and transmissions, reports, and any other evidence, tangible or otherwise, in any way relating to subject of Interrogatory 22 and your responses thereto.

REQUEST FOR PRODUCTION NO. 23:

Please produce any and all records, writings, videos, electronic records and transmissions, reports, and any other evidence, tangible or otherwise, in any way relating to subject of Interrogatory 23 and your responses thereto.

REQUEST FOR PRODUCTION NO. 24:

Please produce any and all records, writings, videos, electronic records and transmissions, reports, and any other evidence, tangible or otherwise, in any way relating to subject of Interrogatory 24 and your responses thereto.

REQUEST FOR PRODUCTION NO. 25:

Please produce any and all records, writings, videos, electronic records and transmissions, reports, and any other evidence, tangible or otherwise, in any way relating to subject of Interrogatory 25 and your responses thereto.

REQUEST FOR PRODUCTION NO. 26:

Please produce any and all records, writings, videos, electronic records and transmissions, reports, and any other evidence, tangible or otherwise, in any way relating to subject of Interrogatory 26 and your responses thereto.

REQUEST FOR PRODUCTION NO. 27:

Please produce any and all records, writings, videos, electronic records and transmissions, reports, and any other evidence, tangible or otherwise, in any way relating to subject of Interrogatory 27 and your responses thereto.

REQUEST FOR PRODUCTION NO. 28:

Please produce any and all records, writings, videos, electronic records and transmissions, reports, and any other evidence, tangible or otherwise, in any way relating to subject of Interrogatory 28 and your responses thereto.

REQUEST FOR PRODUCTION NO. 29:

Please produce all photographs, digital images, videos and other image captures of any kind of the NFC Championship game, including but not limited to the game on the field, any image or capture of any of the referees and umpires comprising the NFC Officiating Crew, and the sidelines of both teams, from any and all directions, angles, overhead, at floor level or otherwise, specifically for the period between the time interval in the 4th Quarter of the NFC Championship game between 4 minutes left in regulation (before the overtime period) of the game and 1 minute left in regulation in the game.

REQUEST FOR PRODUCTION OF DOCUMENTS NO. 30:

Please further produce separately and identify the source of all video tapes, photographs or other captures of any kind of any image during the "No Call" play or any portion of the sidelines, within 20 yards of the backfield of the New Orleans Saints and end zone in which the New Orleans were attempting to score at the time of the "No Call" play and the position on or off the field of any member of the NFC Officiating Crew at any point during the "No Call" play.

REQUEST FOR PRODUCTION NO. 31:

Please produce the entire personnel file along with any and all employment applications, evaluations, disciplinary matters and decisions, and any other records of any kind or nature relating to the members of the NFC Officiating Crew.

REQUEST FOR PRODUCTION NO. 32:

Please produce all notes and records generated by any member of the NFC Officiating Crew before, during and after the NFC Championship game and relating in any way to that game and/or its officiating.

REQUEST FOR PRODUCTION NO. 33:

Please produce any and all records, videos, electronic records, and other evidence you may introduce at the trial of this proceeding.

REQUEST FOR PRODUCTION NO. 34:

Please produce any and all records, videos, speeches, captures of speeches, letters, correspondence, emails, websites, Facebook pages and posts, electronic communications, and any other tangible and intangible items which in any way relate to the fairness, impartiality and/or uniformity of the goal of the NFL and/or its officiating crews' enforcement of its player rules of competition during NFL games that were generated by the NFL or any of its employees during the past three (3) years along with any such tangible or intangible items of this subject matter for which the NFL maintains were in effect at the time of the NFC Championship game identifying the source and year of creation of each such item.

REQUEST FOR PRODUCTION OF DOCUMENTS NO. 35:

Please produce any and all communications, written, verbal, electronic or otherwise to and between any NFL employees in any way relating to the "No Call" play or the officiating of that "No Call" play.

REQUEST FOR ADMISSION OF FACT NO. 1:

Admit or deny that Los Angeles Rams cornerback Nickell Robey-Coleman made helmet to helmet contact with New Orleans Saints receiver Tommy Lee Lewis during the "No Call" play which constituted one or more NFL player rule violations?

REQUEST FOR ADMISSION OF FACT NO. 2:

Admit or deny that Los Angeles Rams cornerback Nickel Robey-Coleman committed pass interference on New Orleans Saints wide receiver Tommy Lee Lewis during the "No Call" play?

REQUEST FOR ADMISSION OF FACT NO. 3:

Admit or deny that Los Angeles Rams cornerback Nickell Robey-Coleman was fined by the NFL for his conduct which constituted a player rule violation during the "No Call" play?

REQUEST FOR ADMISSION OF FACT NO. 4:

Admit or deny that no apology has been given by the NFL or Commissioner Roger Goodell to the New Orleans holders of tickets to the NFC Championship game for the failure of the NFC Officiating Crew to not call a penalty for player conduct violations during the "No Call" play?

REQUEST FOR ADMISSION OF FACT NO. 5:

Admit or Deny that the participation of the Los Angeles Rams football team in the Super Bowl on 3 February 2019 was expected to generate more gross profits for the NFL than if the New Orleans Saints had participated.

REQUEST FOR ADMISSION OF FACT NO. 6:

Admit or deny that the consumer market of Los Angeles, California is significantly larger in population than the consumer market of New Orleans, Louisiana.

REQUEST FOR ADMISSION OF FACT NO. 7:

Admit or deny that Commissioner Roger Goodell had mechanisms available to him to declare the New Orleans Saints football team the winner of the NFC Championship game after the "No Call" play.

REQUEST FOR ADMISSION OF FACT NO. 8:

Admit or deny that the NFL had mechanisms available to it to declare the New Orleans Saints football team the winner of the NFC Championship game after the "No Call" play.

REQUEST FOR ADMISSION OF FACT NO. 9:

Admit or deny that the NFL Commissioner Roger Goodell had mechanisms and/or the authority granted to him by the NFL available to declare a replay of the NFC Championship game or any portion of that game at any time after the "No Call" play and prior to the Super Bowl on 3 February 2019. or other of modified game between the

New Orleans Saints and the Los Angeles Rams football teams to allow for a subsequently declared the winner of the NFC Championship game after the "No Call" play.

REQUEST FOR ADMISSION OF FACT NO. 10:

Admit or deny that the NFL Commissioner Roger Goodell had mechanisms and/or the authority granted to him by the NFL available to declare a modified and new game between the New Orleans Saints and the Los Angeles Rams football teams after the NFC Championship game on 20 January 2019 to allow for a subsequently declared winner of that new NFC Championship game so long as that new NFC Championship game took place prior to the Super Bowl on 3 February 2019.

REQUEST FOR ADMISSION OF FACT NO. 11:

Admit or deny that the NFL had mechanisms available to it to declare a replay or other of modified game between the New Orleans Saints and the Los Angeles Rams football teams to allow for a subsequently declared the winner of the NFC Championship game after the "No Call" play.

REQUEST FOR ADMISSION OF FACT NO. 12:

Admit or deny that at least one member of the NFC Officiating Crew did observe an infraction of the player rules by Los Angeles Rams cornerback Nickell Robey-Coleman during the "No Call" play but chose not to throw a penalty flag and enforce that penalty.

REQUEST FOR ADMISSION OF FACT NO. 13:

Admit or deny that at least one member of the NFC Officiating Crew was in a position to clearly observe an infraction of the player rules by Los Angeles Rams cornerback Nickell Robey-Coleman during the "No Call" play but chose not to throw a penalty flag and enforce that penalty.

REQUEST FOR ADMISSION OF FACT NO. 14:

Admit or deny that at least one infraction of the player rules by Los Angeles Rams cornerback Nickell Robey-Coleman during the "No Call" play was blatant and should have been easily seen by at least one member of the NFC Officiating Crew.

REQUEST FOR ADMISSION OF FACT NO. 15:

Admit or deny that the NFL represented to the general public prior to 20 January 2019 that its referees and officials are highly trained and administer and enforce its player rules during games so as to impartially enforce observed violations of those rules.

REQUEST FOR ADMISSION OF FACT NO. 16:

Admit or deny that Commissioner Roger Goodell had the authority as the NFL Commissioner to have suspended play immediately after the "No call" play to take corrective action for the failure of the NFC Officiating Crew to impose a penalty against Los Angeles Rams cornerback Nickell Robey-Coleman/the Los Angeles Rams but chose not to do so?

REQUEST FOR ADMISSION OF FACT NO. 17:

Admit or deny that Commissioner Roger Goodell had the authority as the NFL Commissioner at any time on 20 January 2019 and after the "No call" play to take corrective action for the failure of the NFC Officiating Crew to impose a penalty against Los Angeles Rams cornerback Nickell Robey-Coleman/the Los Angeles Rams but chose not to do so?

REQUEST FOR ADMISSION OF FACT NO. 18:

Admit or deny that Commissioner Roger Goodell had the authority as the NFL Commissioner at any time on 21 January 2019 to take corrective action for the failure of the NFC Officiating Crew to impose a penalty against Los Angeles Rams cornerback Nickell Robey-Coleman/the Los Angeles Rams arising from the "No Call" play but chose not to do so?

REQUEST FOR ADMISSION OF FACT NO. 19:

Admit or deny that Commissioner Roger Goodell had the authority as the NFL Commissioner at any time on 22 January 2019 to take corrective action for the failure of the NFC Officiating Crew to impose a penalty against Los Angeles Rams cornerback Nickell Robey-Coleman/the Los Angeles Rams arising from the "No Call" play but chose not to do so?

REQUEST FOR ADMISSION OF FACT NO. 20:

Admit or deny that Commissioner Roger Goodell had the authority as the NFL Commissioner at any time on 23 January 2019 to take corrective action for the failure of the NFC Officiating Crew to impose a penalty against Los Angeles Rams cornerback Nickell Robey-Coleman/the Los Angeles Rams arising from the "No Call" play but chose not to do so?

REQUEST FOR ADMISSION OF FACT NO. 21:

Admit or deny that Commissioner Roger Goodell had the authority as the NFL Commissioner at any time on 24 January 2019 to take corrective action for the failure of the NFC Officiating Crew to impose a penalty against Los Angeles Rams cornerback Nickell Robey-Coleman/the Los Angeles Rams arising from the "No Call" play but chose not to do so?

REQUEST FOR ADMISSION OF FACT NO. 22:

Admit or deny that Commissioner Roger Goodell had the authority as the NFL Commissioner at any time on 25 January 2019 to take corrective action for the failure of the NFC Officiating Crew to impose a penalty against Los Angeles Rams cornerback Nickell Robey-Coleman/the Los Angeles Rams arising from the "No Call" play but chose not to do so?

REQUEST FOR ADMISSION OF FACT NO. 23:

Admit or deny that Commissioner Roger Goodell had the authority as the NFL Commissioner at any time on 26 January 2019 to take corrective action for the failure of the NFC Officiating Crew to impose a penalty against Los Angeles Rams cornerback Nickell Robey-Coleman/the Los Angeles Rams arising from the "No Call" play but chose not to do so?

REQUEST FOR ADMISSION OF FACT NO. 24:

Admit or deny that Commissioner Roger Goodell had the authority as the NFL Commissioner at any time on 27 January 2019 to take corrective action for the failure of the NFC Officiating Crew to impose a penalty against Los Angeles Rams cornerback

Nickell Robey-Coleman/the Los Angeles Rams arising from the "No Call" play but chose not to do so?

REQUEST FOR ADMISSION OF FACT NO. 25:

Admit or deny that Commissioner Roger Goodell had the authority as the NFL Commissioner at any time on 28 January 2019 to take corrective action for the failure of the NFC Officiating Crew to impose a penalty against Los Angeles Rams cornerback Nickell Robey-Coleman/the Los Angeles Rams arising from the "No Call" play but chose not to do so.

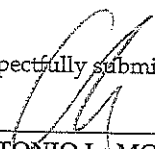
REQUEST FOR ADMISSION OF FACT NO. 26:

Admit or deny that Commissioner Roger Goodell had the authority as the NFL Commissioner at any time on 29 January 2019 to take corrective action for the failure of the NFC Officiating Crew to impose a penalty against Los Angeles Rams cornerback Nickell Robey-Coleman/the Los Angeles Rams arising from the "No Call" play but chose not to do so.

REQUEST FOR ADMISSION OF FACT NO. 27:

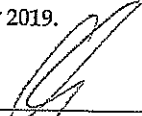
Admit or deny that Commissioner Roger Goodell had the authority as the NFL Commissioner at any time on 31 January 2019 to take corrective action for the failure of the NFC Officiating Crew to impose a penalty against Los Angeles Rams cornerback Nickell Robey-Coleman/the Los Angeles Rams arising from the "No Call" play but chose not to do so?

Respectfully submitted,


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ATTORNEY FOR PETITIONERS

CERTIFICATE OF SERVICE

I, THE UNDERSIGNED COUNSEL FOR PETITIONERS, HEREBY CERTIFIES THAT THIS FORMAL DISCOVERY WAS SERVED UPON THE DEFENDANT WHICH IS THE SUBJECT MATTER OF THIS DISCOVERY BY FACSIMILE THIS 4TH DAY OF FEBRUARY 2019.



ANTONIO LE MON, ESQ.