

EXHIBIT 4

Mueller, Jeff

From: Eric H. Zagrans <eric@zagrans.com>
Sent: Thursday, August 03, 2017 10:14 PM
To: Mueller, Jeff; 'Michael Silverman'
Cc: kb@brunolawus.com; 'Matthew Peterson'; office@clenlaw.com; whcj@clenlaw.com; 'Maura Mastrony'; 'McDevitt, Jerry'; 'Krasik, Curtis B.'
Subject: RE: Bagwell v. WWE - Meet and Confer

Counsel,

Here are our responses to your several requests below seeking to narrow the discovery issues pertaining to your initial set of discovery requests:

1. "Formula" – we agreed during the meet-and-confer, and confirmed in my earlier letter, to answer your interrogatories and respond to your requests for production of documents with respect to the "formula" alleged in the Complaint. We will do so.
2. "Contention Interrogatories" – we continue to believe our objection was and is proper with regard to answering a contention interrogatory at this early stage of the litigation before we have had the chance to conduct **any** discovery. Nevertheless, and without waiving our objection, we will agree that Plaintiffs will respond to Interrogatory No. 4 with any non-privileged information regarding the basis for the allegations made in the Complaint, just as you have specifically requested.
3. "Bank records" – we have reconsidered our position in its entirety. Upon reconsideration, we continue to maintain that the requested discovery is irrelevant to the claims and defenses of the parties, is not proportional to the needs of the case, is not appropriately limited to the time frame material to the issues in this case, and would be unduly burdensome, oppressive and intrusive. However, in the event it were determined that some or all of the requested bank records were appropriately discoverable notwithstanding Plaintiffs' objections, we will agree to make the request for any such bank records regarding any such bank accounts Plaintiffs may be able to recall, provided that it is clearly understood Plaintiffs do not thereby guarantee, represent or warrant that the production of such records received from such banks pursuant to Plaintiffs' request would be complete or otherwise appropriate.
4. "Total Income" – we maintain our position that Plaintiffs' income separate and apart from the royalty payments at issue in this case is completely irrelevant to Plaintiffs' claims or to any appropriate and legally-cognizable defense in this case. Your request also seeks information regarding total income (not just royalty income) received by Plaintiffs from wrestling organizations that are not defendants in this case. We submit that such information regarding non-defendant-generated income is likewise completely irrelevant to any legitimate issue in this case. In addition, your request for total income information does not appear to be appropriately limited to the relevant time frame in this case.
5. "Fee Agreements and Related Documents" – we are in a position to make the additional representations you have requested as part of resolving the dispute over producing the requested fee agreements. We have requested all of the fee agreements from every lawyer who has worked on this case, and we expect to have received all of them by Aug. 7. Therefore, we will be able to make the additional representations having seen all of the documents. In addition, Plaintiffs can answer your question about whether any other attorneys who have not formally entered an appearance, or who are known to you to be seeking to enter an appearance, have been involved in the case in any way or have a financial interest in the outcome of the case, including but not limited to Attorney Konstantine Kyros. Are you prepared to negotiate a resolution of our dispute regarding these requests in exchange for such additional information and representations?

6. "Attorney Who Contacted Bagwell" – we continue to adhere to our statement in my earlier letter that we will disclose in our supplemental responses the identity of the attorney who contacted Bagwell in 2015 in the event Bagwell can identify that attorney at this point in time.

We remain willing, of course, to discuss any of these items further in another call or calls in an effort to resolve any remaining questions or disagreements.

Thank you,

Eric
