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January 27, 2003

Via Fax

Jerry S. McDevitt, Esq.
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Henry W. Oliver Building
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RE: SSAI vs. World Wrestling Federation Entertainment, Inc. (WWFE)
DN X05 CV-00-0180933S

Dear Jerry:

As is so often the case, the attitude and approach contained in your letter of earlier this afternoon is neither productive nor consistent with Connecticut practice. We obtained additional documents from our client in the middle of last week. Following our normal discovery protocol we had the documents copied, Bates numbered and labeled in accordance with the requirements of our confidentiality agreement. Last Friday despite my attendance at a deposition in Bradford PA, I sent notice to you by fax that we were supplementing SSAI's production with these documents and I sent the documents by hand delivery to your local counsel. With a copy of that notice, I sent you the documents by Federal Express at your office in Pittsburgh for delivery today. If you have not received them, please let me know and we will place a trace on the package or perhaps you could simply consult with your Connecticut counsel who has had the documents since Friday.

Our handling of this issue is consistent with the requirements of Practice Book §13-15, which require that we "promptly" give you notice when we are required to do so by our continuing duty of disclosure and then to correct or supplement our prior responses. Having given you notice and produced the additional documents, we will now turn to the issue of reviewing and correcting our prior responses as may be appropriate. I believe our duty as counsel for the plaintiff, requires us to carefully review and assist SSAI in correcting and/or supplementing its prior responses and filings in

this matter.

Given the nature of the corrective responses we may be filing, we will not be rushed to meet some artificial 10 day deadline you are interpolating into the rules. Indeed, the timing of this undertaking must be judged in accordance with WWE's prior discovery conduct in this case. In this regard, I am particularly mindful that WWE did not correct its false and misleading privilege log that omitted reference to your private deposition of Mr. Goetz for more than six months. Especially since my time is being committed to the numerous depositions which are proceeding in this case, I do not think it unreasonable if the process of correcting and supplementing our prior written responses and court filings on behalf of SSAI, takes a few more weeks. I know nothing I can say will dissuade you from making further filings with the Court, so we will simply continue to proceed in good faith, and we will see your filings when and if they arrive.

I look forward to seeing you or one of your colleagues at tomorrow's deposition of Ms McMahon.

Very truly yours,



Peter M. Nolin

PMN:pf

cc: Richard Colbert, Esq. (via fax)

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FROM: Peter M. Nolin, Esq.

DATE: January 27, 2003

RE: SSAI v. WWE

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