

Exhibit I

Joseph, David C.

From: Krumholz, Richard
Sent: Wednesday, December 31, 2008 10:50 AM
To: 'Cary Ichter'
Cc: 'Robert Blackwell'; Joseph, David C.
Subject: RE: Ashenoff

Cary,

1. We are not producing documents that evidence any actions taken against other wrestlers for alleged drug use as none exist during the relevant timeframe.
2. We are not producing other wrestlers payment information until Mr. Ashenoff communicates some basis for his belief that TNA has discriminated against him on the basis of pay, which you have refused to do. You have likewise refused to provide what category of wrestler you believe is similarly situated. As such, we believe your request is overreaching.

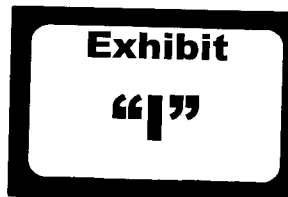
Also, we have not heard anything or been produced any information re your deficiencies in your discovery responses, including i) the failure to produce any information in response to TNA's 2nd set of interrogatories (i.e. the failure to identify any Dr. or pharmacist that prescribed medications to Ashenoff), ii) the failure to produce known correspondence with other TNA wrestlers, and iii) the failure to provide any rehab facilities where Ashenoff has been treated. We will likewise be filing a motion to compel and for costs concerning these issues.

Richard

From: Cary Ichter [mailto:cichter@adorno.com]
Sent: Wednesday, December 31, 2008 10:39 AM
To: Krumholz, Richard
Subject: Ashenoff

Richard: I had asked that we have your final word on the issues related to our discovery disputes by yesterday. As we have heard nothing from you, I am filing our motion to compel today. Cary

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Cary Ichter	
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APP-33

01/07/2009