

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, ss.)	SUPERIOR COURT
)	CIVIL DEPARTMENT
)	CIVIL ACTION NO: 00-4988G
)	
DAVID LEE MEGGETT)	
Plaintiff)	
)	
VS.)	
)	
NEW ENGLAND PATRIOTS LIMITED)	
PARTNERSHIP, BERTRAM ZARINS, M.D.,)	
MICHAEL G. WILSON, M.D. AND RONALD)	
O'NEIL)	

PLAINTIFF DAVID MEGGETT'S ANSWERS TO
REQUESTS FOR ADMISSIONS FROM DEFENDANT NEW ENGLAND PATRIOTS
LIMITED PARTNERSHIP

Comes now plaintiff, David Meggett by and through his undersigned attorneys, and answers Defendant's request for admissions as follows:

1. In 1995, the Plaintiff set a career-low record of 8.5 yards per kick return.

RESPONSE: Plaintiff objects to this Request for Admission because it asks for information not readily available to Plaintiff or his counsel. Plaintiff's counsel has written counsel for the Defendants to ask for the underlying data that counsel has available to him so that it can fairly answer this request. Counsel suggested that Plaintiff's counsel buy a book that would provide these answers. This level of research goes beyond Plaintiff's due diligence requirement. Plaintiff also objects because the phrase "kick return" is ambiguous because, given the context, it could be a punt or a kickoff return. Therefore, plaintiff cannot admit or deny this request.

2. In 1995, the Plaintiff's 8.5 years per punt return average ranked 17th of 21 qualified returners (20+ punt returns).

RESPONSE: Plaintiff objects to this Request for Admission because it asks for information

not readily available to Plaintiff or his counsel. Plaintiff's counsel has written counsel for the Defendants to ask for the underlying data that counsel has available to him so that it can fairly answer this request. Defendants' counsel refused suggesting that Plaintiff's counsel buy a book that would provide these answers. This level of research goes beyond Plaintiff's due diligence requirement. Therefore, plaintiff cannot admit or deny this request.

3. After averaging 3.67 touchdowns per season in 1989-1994, the Plaintiff averaged 1.67 touchdowns per season in 1995-1997.

RESPONSE: Plaintiff objects to this Request for Admission because it asks for information not readily available to Plaintiff or his counsel. Plaintiff's counsel has written counsel for the Defendants to ask for the underlying data that counsel has available to him so that it can fairly answer this request. Defendants' counsel refused suggesting that Plaintiff's counsel buy a book that would provide these answers. This level of research goes beyond Plaintiff's due diligence requirement. Therefore, plaintiff cannot admit or deny this request.

4. In 1997 the Plaintiff did not have a punt or kick return touchdown for only the second time in his nine-year career.

RESPONSE: Plaintiff objects to this Request for Admission because it asks for information not readily available to Plaintiff or his counsel. Plaintiff's counsel has written counsel for the Defendants to ask for the underlying data that counsel has available to him so that it can fairly answer this request. Defendants' counsel refused suggesting that Plaintiff's counsel buy a book that would provide these answers. This level of research goes beyond Plaintiff's due diligence requirement. Therefore, plaintiff cannot admit or deny this request.

5. In 1997, the Plaintiff set career-low records in reception, receiving yards, rushing attempts, rushing yards and offensive playtime percentage.

RESPONSE: Plaintiff objects to this Request for Admission because it asks for information not readily available to Plaintiff or his counsel. Plaintiff's counsel has written counsel for the Defendants to ask for the underlying data that counsel has available to him so that it can fairly answer this request. Defendants' counsel refused suggesting that Plaintiff's counsel buy a book

that would provide these answers. This level of research goes beyond Plaintiff's due diligence requirement. Therefore, plaintiff cannot admit or deny this request.

6. Six of 10 players with 964+ kick return yards two years ago (1999) are not currently on an active NFL roster.

RESPONSE: Plaintiff objects to this Request for Admission because it asks for information not readily available to Plaintiff or his counsel. Plaintiff's counsel has written counsel for the Defendants to ask for the underlying data that counsel has available to him so that it can fairly answer this request. Defendants' counsel refused suggesting that Plaintiff's counsel buy a book that would provide these answers. This level of research goes beyond Plaintiff's due diligence requirement. Therefore, plaintiff cannot admit or deny this request.

7. Eight of Seventeen players with 38+ kick returns two years ago (1999) are not currently on an active NFL roster.

RESPONSE: Plaintiff objects to this Request for Admission because it asks for information not readily available to Plaintiff or his counsel. Plaintiff's counsel has written counsel for the Defendants to ask for the underlying data that counsel has available to him so that it can fairly answer this request. Defendants' counsel refused suggesting that Plaintiff's counsel buy a book that would provide these answers. This level of research goes beyond Plaintiff's due diligence requirement. Therefore, plaintiff cannot admit or deny this request.

8. In July 1997, the Plaintiff took a 22.2% pay cut (\$1M in 97-99) to avoid being release by the team.

RESPONSE: Denied.

9. Only 31 of approximately 550 vested veterans took a pay cut in 1997.

RESPONSE: Plaintiff objects to this Request for Admission because it asks for information not readily available to Plaintiff or his counsel. Plaintiff's counsel has written counsel for the Defendants to ask for the underlying data that counsel has available to him so that it can fairly answer this request. Defendants' counsel refused suggesting that Plaintiff's counsel buy a book that would provide these answers. This level of research goes beyond Plaintiff's due diligence

requirement. Therefore, plaintiff cannot admit or deny this request.

10. Ten of Thirty-four (29%) 1996 Pro Bowlers with 7+ accrued seasons were not in NFL in 1999.

RESPONSE: Plaintiff objects to this Request for Admission because it asks for information not readily available to Plaintiff or his counsel. Plaintiff's counsel has written counsel for the Defendants to ask for the underlying data that counsel has available to him so that it can fairly answer this request. Defendants' counsel refused suggesting that Plaintiff's counsel buy a book that would provide these answers. This level of research goes beyond Plaintiff's due diligence requirement. Therefore, plaintiff cannot admit or deny this request.

11. Sixteen of Thirty-four players (47%) were not in NFL in 2000.

RESPONSE: Plaintiff objects to this Request for Admission because it asks for information not readily available to Plaintiff or his counsel. Plaintiff's counsel has written counsel for the Defendants to ask for the underlying data that counsel has available to him so that it can fairly answer this request. Defendants' counsel refused suggesting that Plaintiff's counsel buy a book that would provide these answers. This level of research goes beyond Plaintiff's due diligence requirement. Plaintiff also does not understand this incomprehensible request. Therefore, plaintiff cannot admit or deny this request.

12. Twenty of Thirty-four players (59%) were gone in 2001 season.

RESPONSE: Plaintiff objects to this Request for Admission because it asks for information not readily available to Plaintiff or his counsel. Plaintiff's counsel has written counsel for the Defendants to ask for the underlying data that counsel has available to him so that it can fairly answer this request. Defendants' counsel refused suggesting that Plaintiff's counsel buy a book that would provide these answers. This level of research goes beyond Plaintiff's due diligence requirement. Plaintiff also does not understand this incomprehensible request. Therefore, plaintiff cannot admit or deny this request.

13. In 1997, the Plaintiff was the oldest player in the NFL to have 20 or more punt returns.

RESPONSE: Plaintiff objects to this Request for Admission because it asks for information not readily available to Plaintiff or his counsel. Plaintiff's counsel has written counsel for the Defendants to ask for the underlying data that counsel has available to him so that it can fairly answer this request. Defendants' counsel refused suggesting that Plaintiff's counsel buy a book that would provide these answers. This level of research goes beyond Plaintiff's due diligence

requirement. Therefore, plaintiff cannot admit or deny this request.

14. In 1997, the Plaintiff was the 2nd oldest player in the NFL to have 20 or more kick returns, and the oldest "Herschel Walker" retired after the 1997 season.

RESPONSE: Plaintiff objects to this Request for Admission because it asks for information not readily available to Plaintiff or his counsel. Plaintiff's counsel has written counsel for the Defendants to ask for the underlying data that counsel has available to him so that it can fairly answer this request. Defendants' counsel refused suggesting that Plaintiff's counsel buy a book that would provide these answers. This level of research goes beyond Plaintiff's due diligence requirement. Therefore, plaintiff cannot admit or deny this request.

15. In 1997, only 11 % of NFL players were older than the Plaintiff.

RESPONSE: Plaintiff objects to this Request for Admission because it asks for information not readily available to Plaintiff or his counsel. Plaintiff's counsel has written counsel for the Defendants to ask for the underlying data that counsel has available to him so that it can fairly answer this request. Defendants' counsel refused suggesting that Plaintiff's counsel buy a book that would provide these answers. This level of research goes beyond Plaintiff's due diligence requirement. Therefore, plaintiff cannot admit or deny this request.

16. There were 33.5% players older than the Plaintiff who were not in the NFL in 1998.

RESPONSE: Plaintiff objects to this Request for Admission because it asks for information not readily available to Plaintiff or his counsel. Plaintiff's counsel has written counsel for the Defendants to ask for the underlying data that counsel has available to him so that it can fairly answer this request. Defendants' counsel refused suggesting that Plaintiff's counsel buy a book that would provide these answers. This level of research goes beyond Plaintiff's due diligence requirement. Plaintiff also does not understand this incomprehensible request. Therefore, plaintiff cannot admit or deny this request.

17. There were 53.3% of players older than the Plaintiff who were not in the NFL in 1999.

RESPONSE: Plaintiff objects to this Request for Admission because it asks for information not readily available to Plaintiff or his counsel. Plaintiff's counsel has written counsel for the Defendants to ask for the underlying data that counsel has available to him so that it can fairly answer this request. Defendants' counsel refused suggesting that Plaintiff's counsel buy a book that would provide these answers. This level of research goes beyond Plaintiff's due diligence requirement. Plaintiff also does not understand this incomprehensible request. Therefore, plaintiff cannot admit or deny this request.

18. There were 71.8% of players older than the Plaintiff who were not in the NFL in 2000.

RESPONSE: Plaintiff objects to this Request for Admission because it asks for information not readily available to Plaintiff or his counsel. Plaintiff's counsel has written counsel for the Defendants to ask for the underlying data that counsel has available to him so that it can fairly answer this request. Defendants' counsel refused suggesting that Plaintiff's counsel buy a book that would provide these answers. This level of research goes beyond Plaintiff's due diligence requirement. Plaintiff also does not understand this incomprehensible request. Therefore, plaintiff cannot admit or deny this request.

19. In 1990, the Plaintiff was charged with lewdness and soliciting a prostitute after it was alleged he offered to pay an undercover Baltimore, Maryland, police officer for sex.

RESPONSE: Plaintiff objects to this request because it is not remotely relevant to the issues in this litigation.

20. In 1998, the Plaintiff was charged with sexual assault in Toronto, Canada, after an encounter with a prostitute in a Hotel room.

RESPONSE: Plaintiff objects to this request because it is not remotely relevant to the issues in this litigation.

21. In June of 2001, the Plaintiff was charged with third-degree criminal sexual conduct in South Carolina, when a 26 year-old woman alleged he forced her into his car and had sex with her without her permission.

RESPONSE: Plaintiff objects to this request because it is not remotely relevant to the issues in this litigation.

22. The Associated Press article attached correctly quotes the Plaintiff.

RESPONSE: Denied.

I do solemnly declare and affirm under the penalties and pains of perjury that the foregoing Answers to Request for Admission are true and correct to the best of my knowledge, information and belief.

DAVID LEE MEGGETT

Respectfully submitted,

Ronald V. Miller, Jr.