

# EXHIBIT 4

**From:** [Parsigian, Jeanifer](#)  
**To:** [Butwin, Jake R.](#); [Ruskin, Bradley I.](#); [sledingham@proskauer.com](mailto:sledingham@proskauer.com); [Angela.Krahulik@icemiller.com](mailto:Angela.Krahulik@icemiller.com); [Lauren.Baldwin@icemiller.com](mailto:Lauren.Baldwin@icemiller.com); [AGordon@paulweiss.com](mailto:AGordon@paulweiss.com); [MGoodman@paulweiss.com](mailto:MGoodman@paulweiss.com); [Vernon.cassin@bakerbotts.com](mailto:Vernon.cassin@bakerbotts.com); [Richard.harper@bakerbotts.com](mailto:Richard.harper@bakerbotts.com); [Adam Lauridsen](#); [Holly.Minnis@icemiller.com](mailto:Holly.Minnis@icemiller.com)  
**Cc:** [Gordon, Ben](#); [Bovia, Jasmine A.](#); [Perreault, Kelly](#)  
**Subject:** 2311 Racing LLC et al. v. NASCAR LLC et al. (24-cv-00886-KDB-SCR)  
**Date:** Friday, March 21, 2025 10:49:24 AM  
**Attachments:** [image001.jpg](#)

---

Counsel,

Following up on yesterday's meet & confer, Plaintiffs are willing to compromise by limiting the relevant time period: **January 1, 2016 to December 31, 2024**. The start of our time period coincides with start of the NASCAR Cup Series' charter system which makes it the relevant period for the purpose of the analyses we intend to do relating to anticompetitive effects and damages.

Restating here our narrowed requests for reference that we are willing to accept to satisfy the subpoena (for the narrowed time-period noted above):

1. A declaration or documents sufficient to show the percentage and types of revenue (e.g. media, ticket, concession, etc.) that are shared with or among League and teams.
2. A declaration or documents sufficient to show the formula for the split among the teams and league of each category of revenue.
3. A declaration or documents sufficient to show the amounts of revenues shared with or retained by the league and the teams.
4. Documents sufficient to show the valuations of expansion or current teams.
5. The League Constitution, by-laws, and collective bargaining agreement

Please let us know if your clients agree to the above proposal. We remain available for further discussions if helpful.

If we cannot reach agreement, Plaintiffs will file a motion to compel on March 31.

Best,  
Jeanifer

## **Jeanifer Parsigian**

### **Partner**

Winston & Strawn LLP  
101 California Street  
San Francisco, CA 94111-5891

D: +1 415-591-1469

F: +1 415-591-1400

[Email | \[winston.com\]\(http://winston.com\)](mailto:jeanifer.parsigian@winston.com)

*Not admitted to practice in California*



Please consider the environment before printing this e-mail.