

June 11, 2018

**BY ELECTRONIC MAIL**

Gloria Allred, Esq.  
Allred, Maroko & Goldberg  
6300 Wilshire Boulevard  
Suite 1500  
Los Angeles, CA 90048

Re: Your June 4, 2018 Letter

Dear Ms. Allred:

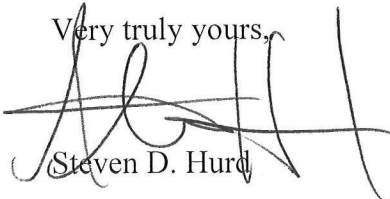
Thank you for your June 4, 2018 letter to NFL Commissioner Roger Goodell concerning your representation of five former cheerleaders for the Houston Texans.

The NFL agrees that cheerleaders, like all other employees of the clubs, have the right to work in a safe, positive and respectful environment, free from harassment and discrimination and without fear of retaliation. The league also agrees that all club employees, including cheerleaders, should be paid consistent with the requirements of federal, state and local law.

As you know, however, the league office does not employ cheerleaders or other club employees, nor does it dictate whether clubs have or do not have cheerleaders, nor any aspect of their cheerleader programs. Some clubs choose not to have cheerleaders at all. As such, the NFL cannot comment on the assertions you make in your letter, except to say that where issues have been raised, including concerning compliance with wage and hour provisions of law, those issues have been addressed by the relevant club or clubs, and the league office has taken steps to inform all clubs about the importance of those issues.

Beyond that, the league office has undertaken a renewed effort during this offseason to encourage all clubs with cheerleader programs to review all aspects of those programs to ensure that they are not simply lawful, but appropriate, and consistent with the principles articulated above. Consistent with that approach, the league office has been working with clubs so that each club maintains an appropriate and supportive workplace.

Very truly yours,

  
Steven D. Hurd

SDH:dm

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