THE UNIVERSITY
of NORTH CAROLINA
at CHAPEL HILL

OFFICE OF UNIVERSITY COUNSEL

110 BYNUM HALL
CAMPUS BOX 9105
222 EAST CAMERON AVENUE
CHAPEL HILL, NC 27599-9105

T 919.962.1219
F 919.843.1617

December 21, 2010

Ms. Amanda Martin
Stevens Martin Vaughn & Tadych, PLLC
1101 Haynes Street, Suite 100
Raleigh, North Carolina 27604-1455

Re: The News and Observer Publishing Company v. Baddour, et al.

Dear Ms. Martin:

This letter is a follow-up to the mandatory mediation in this matter held on Monday, December 13, 2010, pursuant to North Carolina General Statutes 7A-38.3E.

As you know, paragraph 18(b) of the Complaint requests the "Names of all individuals and organizations that provided impermissible benefits to any UNC football players."

Over the past three months, the University has released documents identifying the following as persons determined to have provided impermissible benefits to UNC football players:

Omar Brown
Mahlon Carey
Vernon Davis
Christopher Hawkins
Michael Katz
Hakeem Nicks
A.J. Machado
Todd Stewart
Jennifer Wiley
A person from Miami whose full name is not known

To date, the University has not made any specific determinations about "organizations" that may have provided impermissible benefits to UNC football players. Some of the individuals listed above may be affiliated with organizations or other individuals that were outside the scope of the University's investigation. According to the website for Rosenhaus Sports, Mr. Katz is the company's Director of Marketing and Client Services. Mr. Stewart may be affiliated with Pro Sports Financial. Mr. Vernon Davis may have included his brother, Mr. Vontae Davis, in some contacts with UNC football players. Mr.

Hawkins may have included Mr. Martin Blazer in some contacts with UNC football players. The website for Blazer Capital Management, LLC, states that Mr. Blazer is that company's founder and principal owner.

A number of media outlets have reported that Kentwan Balmer may have provided impermissible benefits to a Carolina football player and that Gary Wichard of Pro Tect Management had impermissible contact with a Carolina football player.

This is a complete list of all of the individuals and organizations identified by the University at this time, in public records or otherwise, as having provided impermissible benefits to one or more UNC football players.

Based on the parties' agreement, I understand that this letter satisfies the University's obligation to provide the information requested in paragraph 18(b) of the Complaint such that this paragraph no longer is an issue in the pending lawsuit. If I have misunderstood what we agreed to, please let me know as soon as possible.

As we have discussed, the University remains open to any proposal that will narrow the issues before the Court. If you or your clients identify other areas of potential agreement, we look forward to working with you as best we can.

Very truly yours,

Leslie Chambers Strohm

Leslie Chambers Strohm
Vice Chancellor and General Counsel