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March 30, 2017

VIA ELECTRONIC MAIL

Mr. Greg Sankey
Chair, NCAA Division I Committee on Infractions
National Collegiate Athletic Association
P.O. Box 6222
Indianapolis, IN 46206-6222

Re: The University of North Carolina at Chapel Hill — Case No. 00231

Dear Mr. Sankey:

The University of North Carolina at Chapel Hill (the University) asked that the following be included in the enforcement staff's response to your March 16, 2017, letter to all parties.

As it relates to a new time schedule for the processing of this case, it is vital for all parties to have an adequate time period after Ms. Crowder's interview to thoroughly analyze and digest her testimony. If there is a need for additional witness testimony and/or document gathering based on her statements, the University is committed to conducting such efforts with efficiency and care, but cannot agree to rush through such efforts. The University submits that a period of seven days after the completion of Ms. Crowder's interview is required to review whether there is any need for additional investigation. After that time, the University would work with the enforcement staff and other parties to submit a briefing schedule.

The University shares the Panel's desire not to delay this case; however, our shared desire for expedition should not override the responsibility of all parties to present relevant facts to the Panel. Principles of fairness require that the Panel afford the parties an appropriate period of time to evaluate what may be learned from Ms. Crowder. Our concerns over fairness, which we have expressed in our prior correspondence, were heightened through comments in the March 16 letter. A few weeks ago, the University was concerned when the Panel rejected its request for a two-week extension to file its Response. Given the changing nature of the NCAA's

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allegations against the University, that request was a modest one. Part of the rationale given for not granting the two-week extension was that the case had been slotted for a June hearing. The March 16 letter was the first time the University had been notified of a June hearing date.

The University's concerns over fairness were further heightened when your March 16 letter suggested witnesses for potential interviews, including individuals who have been discredited. It is the University's position that there is no NCAA bylaw that allows the Panel to suggest witnesses when its role is as the impartial adjudicator. Moreover, for particular individuals to be referenced as potential witnesses suggests that the Panel is being influenced by media reports and not the record of the case. The University has been clear that the merits of this matter should not be prejudged and that the focus of the case should be on the record that the parties have worked to develop. The University notes its objection to this infractions case being tried based on media reports before a hearing on the merits has even taken place.

Sincerely,

BOND, SCHOENECK & KING, PLLC



Richard J. Evrard

RJE/gm

cc: Mr. Elliott Abrams
Ms. Lissa Broome
Mr. Bubba Cunningham
Chancellor Carol Folt
Mr. Joel McGormley
Mr. Mark Merritt
Mr. Randall Roden
Mr. Bill Thomas