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August 16, 2011

Chancellor Holden Thorp  
Office of the Chancellor  
103 South Building  
Campus Box 9100  
Chapel Hill, NC 27599-9100

Re: public records request

Dear Chancellor Thorp:

I write on behalf of UNC alumnus E. Vernon F. Glenn, of Mt. Pleasant, South Carolina, who obtained his undergraduate degree from the University of North Carolina in 1972. Pursuant to the North Carolina Public Records Law, G.S. § 132-1 *et seq.*, I request copies of the public records identified in the attached list. We believe that these documents are fully public and are not subject to any exemptions to the Public Records Law.

The NCAA investigation of UNC and its football program has been the subject of extensive public discussion. Likewise, your decision with regard to the termination of Coach Davis has been the subject of intense public discussion and scrutiny, both with regard to its substance and its timing. As you know, the law provides that even documents exempted from the Public Records Law by the State Personnel Act may be released when “the release of such information or the inspection and examination of such file or portion thereof is essential to maintaining the integrity of such department or to maintaining the level or quality of services provided by such department . . . .” G.S. § 126-24. Accordingly, and in keeping with the University motto *lux libertas*, we urge you to consider release pursuant to this integrity exception, even if you consider some of the requested records to be personnel records.

Although it is clear that an individual requesting public records need not disclose his reason for doing so, my client does not mind telling you why he makes this request. Unlike those individuals who have been identified in recent media coverage as considering a class action against the University, he has no interest in such a claim. He seeks information only.

We believe that we have limited our requests to a very specific category of records and narrow time period. In the event that copies of these records are not readily and immediately available, we request to be provided copies of records as they become available. We are happy to receive the documents in whatever medium is most convenient for you – hard copy or electronic – and of course we are happy to pay the actual cost of reproduction of the records.

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If you have any questions with regard to this request, or would like to discuss it, please feel free to call or email me.

Very truly yours,

STEVENS MARTIN VAUGHN & TADYCH, PLLC



C. Amanda Martin

- Copies of all communications in your possession or control – including memoranda, reports, notes, letters, emails, or text messages – since June 21, 2011, with regard to the academic integrity of the University of North Carolina-Chapel Hill
  - to or from the UNC Board of Trustees, collectively or individually;
  - to or from Tom Ross;
  - to or from Dick Baddour; or
  - to or from anyone not employed by the University of North Carolina.
  
- Copies of all communications in your possession or control – including memoranda, drafts, notes, letters, emails, or text messages – related to the joint statement released June 21, 2011, on the TarHeelBlue.com website; the July 28, 2011, press conference; or the August 4, 2011, press conference
  - to or from the UNC Board of Trustees, collectively or individually;
  - to or from Tom Ross;
  - to or from Dick Baddour; or
  - to or from anyone not employed by the University of North Carolina.
  
- Copies of all communications in your possession or control – including memoranda, reports, notes, letters, emails, or text messages – since June 20, 2011, with regard to the employment status of Coach Butch Davis
  - to or from the UNC Board of Trustees, collectively or individually;
  - to or from Tom Ross;
  - to or from Dick Baddour; or
  - to or from anyone not employed by the University of North Carolina.
  
- Copies of all communications in your possession or control – including memoranda, reports, notes, letters, emails, or text messages – with regard to any analysis of the feedback received by the University or any of its employees regarding the termination of the employment of Coach Butch Davis.
  
- Copies of all communications in your possession or control – including reports, notes, letters, emails, or text messages – or authorizations since June 15, 2010, with regard to the possibility of UNC offering, proposing or otherwise assessing self-imposed penalties and punishments or voluntarily accepting penalties of the NCAA
  - to or from the UNC Board of Trustees, collectively or individually;
  - to or from Tom Ross;
  - to or from Dick Baddour; or
  - to or from anyone not employed by the University of North Carolina.
  
- Copies of all appointment books, calendars, daily schedules, and travel records/receipts - - including schedule changes and amendments – for Chancellor Thorp from June 20 through July 28.