



Samir B. Dahman | Partner in Charge, Columbus

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*Via First-Class U.S. Mail and Email to [mmerritt@unc.edu](mailto:mmerritt@unc.edu)*

March 6, 2018

Mark Merritt, Vice Chancellor and General Counsel  
The University of North Carolina  
222 East Cameron Avenue, 110 Bynum Hall  
Campus Box #9105  
Chapel Hill, NC 27599-9105

**Re: Spielman v. IMG et al., U.S. District Court for the Southern District of Ohio, Case No. 2:17-cv-612 – FOIA Request.**

Dear Vice Chancellor and General Counsel Merritt,

Charles “Chris” Spielman (“Mr. Spielman”) has initiated the above captioned class-action lawsuit against IMG College, LLC, IMG Worldwide, Inc., and WME Entertainment, dba IMG, dba International Management Group, dba Endeavor LLC (collectively “IMG”) and Nike, Inc. You are receiving this “FOIA Request” because The University of North Carolina (the “University”) has been named as a co-conspirator in the above-captioned lawsuit and you may have relevant information in your possession. If the University or your athletic department is represented by counsel, please let me know so I may communicate through them.

Under North Carolina Public Records Law, G.S. §132-1 *et seq.*, I am requesting copies of records that relate to all potential sources of information related to Mr. Spielman’s case that are within your possession, custody, or control. This includes, but is not limited to, the following over the last 10 years:

- All contracts between your athletic department and IMG or Nike;
- All records of payment, including receipts, breakdowns, checks, etc., between your University and IMG or Nike;
- All marketing programs IMG participated in or sponsored with your University;
- All cloud or otherwise shared drives between your athletic department and IMG or Nike;
- All instances of name, image or likeness (“NIL”) of current or former football players from your University transmitted between your athletic department and IMG or Nike;
- All emails between your athletic department and IMG or Nike relating to the NIL of current or former football players from your University; and



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- Anything produced by IMG or Nike containing the NIL of any current or former football player from your University.

If there are any fees for searching or copying these records, please inform me if the cost will exceed \$150.

Please respond to this request promptly. If it will take you more than 10 days to respond, let me know. If you deny any of this request, please provide specific authority for any such denial.

Thank you and I look forward to hearing from you.

Sincerely,

Samir Dahman  
Partner in Charge, Columbus