From: Mari2much@aol.com
Sent: Tuesday, October 4, 2011 5:42 PM
To: Johanningmeier,Rich <rjohanningmeier@ncaa.org>
Cc: Najjar, Ameen <anajjar@ncaa.org>
Subject: NCAA INVESTIGATION
Attach: SHAPIRO NEVIN NCAA PROPOSAL.pdf

Gentlemen, as per your request, attached please find a copy of a cover letter and two (2) invoice attachments from attorney Maria Elena Perez. Should you have any additional questions or comments, please feel free to contact my office at your earliest convenience. Looking forward to your response, I am,

Very truly yours,

Beth Lopez
Beth Lopez, Legal Assistant to
Attorney Maria Elena Perez, Esq.
145 Madeira Avenue, Suite 310
Coral Gables, Florida 33134

MARIA ELENA PÉREZ, P.A.
ATTORNEY AT LAW

145 MADEIRA AVENUE
SUITE 310
CORAL GABLES, FLORIDA 33134

TELEPHONE (305) 461-3100
FACSIMILE (305) 461-3444

October 4th, 2011

NCAA
1802 Alonzo Watsford Senior Drive
Indianapolis, IN. 46202

REF: **NCAA INVESTIGATION OF THE UNIVERSITY OF MIAMI ATHLETIC PROGRAM**

Dear Mr. Johanningmeier:

First and foremost attached please find a copy of the requested invoice and estimated cost proposal. Please note that I was extremely conservative with my time, and I will delegate as much as possible to my paralegal in order to cut expenses. The depositions will be of the following individuals: (1) Michael Huyghue; (2) Sean Allen; (3) Mario Sanchez; (4) [redacted] (5) [redacted] (6) [redacted] (7) [redacted] (8) [redacted] (9) [redacted]. Although they are not included in the depositions listed, I also propose that the owners and employees of Grazie and Prime 112 restaurant be deposed after having an investigator confirm who at those establishments have information we want to flesh out during the course of a deposition. Additionally, the FBI 302 report summaries that were already prepared for the NCAA are for both Mr. Shapiro and [redacted], are also laden with information that you may find useful, as both Mr. Shapiro and Mr. [redacted] reported certain matters regarding Mr. Shapiro and his relationship with some University of Miami athletes and coaches to the FBI.

Along that same vein, the deposition of [redacted], who is a victim/investor of Mr. Shapiro will also prove useful to your investigation, as [redacted] purportedly admitted on the record to witnessing certain events between Mr. Shapiro and the basketball team coach and assistant coach, as well as various University of Miami Basketball players who were also present at a function witnessed by [redacted]. Lastly, the documents referenced in one (1) of the two (2) attached invoiced are already ready for production, however, as I indicated during the course of our last conversation, I was hesitant to forward any work until the issue of the expenses and legal fees were clarified and resolved with the full understanding of both parties.

Thank you for your time and anticipated cooperation in this matter. Looking forward to your response, I am,

Very truly yours,

Maria Elena Pérez, Esq.
Enclosure(s)

INVOICE

Maria Elena Perez, Esq.
145 Madeira Avenue
Suite 310
Coral Gables, Fl. 33134
Office: (305) 461-6778
Fax: (305) 461-3444
Email: Mari2much@aol.com

BILL FOR:
NCAA
1802 Alonzo Watsford Senior Dr.
Indianapolis, IN. 46202
ATTN: RICHARD JOHANNINGMEIER

Invoice Date 10/4/2011

REF: NCAA INVESTIGATION DOCUMENT PRODUCTION

WORK DESCRIPTION	HOURS EXPENDED	AMOUNT
1. FBI 302 Report Summaries	2.5 HRS.	$625.00
2. [redacted] Deposition -- Motion to Unseal	10.0 HRS.	$2,500.00
3. Wachovia Bank Account 2002 through 2009	1.0 HRS.	$250.00
4. American Express Records 2004 through 2005	1.0 HRS.	$250.00
5. CITI Credit Card Statements 2002-2003; 2002-2005; 2006	1.5 HRS.	$375.00
6. AT&T Phone Records	2.0 HRS.	$500.00
7. Discovery from Federal Case	2.5 HRS.	$625.00
	TOTAL HRS: 20.5 HRS @$250.00 PER HR.	**$5,125.00**
Copy Costs: ($0.18 per page)		
CITI Statements	59 copies	$10.62
Axcess Sports, Buchwalds, & Riviera Yatch Docs.	27 copies	$4.86
Wachovia Bank Statements, 02-09	246 copies	$44.28
American Express	199 copies	$35.82
20 CDs Containing Additional Bank statements & Governtment Discovery		$240.16
Courier Costs for CD copies Sent to Accord Productions		$50.00
	TOTAL COSTS INCURRED:	**$385.74**
	TOTAL	$5,510.74

COMMENTS/NOTES:

INVOICE

Maria Elena Perez, Esq.
145 Madeira Avenue
Suite 310
Coral Gables, Fl. 33134
Office: (305) 461-6778
Fax: (305) 461-3444
Email: Mari2much@aol.com

BILL FOR:
NCAA
1802 Alonzo Watsford Senior Dr.
Indianapolis, IN. 46202
ATTN: RICHARD JOHANNINGMEIER

Invoice Date 10/4/2011

NCAA DEPOSITION PROPOSAL

WORK DESCRIPTION	AMOUNT
1. Virtual Office Service Agreement for October 24-28, 2011 and October 31st, 2011	$2,280.00
2. Court Reporter Fee for 6 Full Days at $290.00 Per Day	$1,740.00
3. Transcript Costs--$4.25 Per Page (Expedited Fee for 7 Day Service)	$0.00
4. Subpoena Service for 9 Individuals of Which 5 are out of Miami-Dade County and therefore they need to be served with an out-of-state process server.	$1,000.00
5. Copy Costs--Exhibits to be used during depositions	$500.00
ESTIMATED ATTORNEY TIME:	
25 HRS. at a rate of $250.00 per hour	$6,250.00
ESTIMATED PARALEGAL TIME:	
30 HRS. at a rate of $80.00 per hour	$2,400.00
TOTAL ESTIMATED AMOUNT	**$14,420.00**
TOTAL	$14,420.00

COMMENTS/NOTES: