From: Najjar, Ameen <anajjar@ncaa.org>
Sent: Wednesday, December 14, 2011 4:20 PM
To: Mari2much@aol.com
Cc: Johanningmeier,Rich <rjohanningmeier@ncaa.org>
Subject: Re: PLEASE REVIEW CORRESPONDENCE FROM COUNSEL FOR SEAN ALLEN

As I mentioned in my previous email, is phone participation by the university possible (listen only)? Under our cooperative principle, I have to notify them.

Sent from my iPhone

On Dec 14, 2011, at 4:10 PM, "Mari2much@aol.com" <Mari2much@aol.com> wrote:

> As the attached correspondence clearly indicates, Mr. Allen and his counsel do not want anyone else to know about the deposition. I am not going to give his attorney a lecture on the Bankruptcy rules, however, it is my clear understanding that Rule 2004 examinations are public proceedings and can be attended by anyone. That being said, I do not want to spook Mr. Allen, and transcripts and video of the deposition will be available and I cannot foresee any grounds that his counsel may have to move to seal same. I do not know how you want to handle this, but I think it is not a good idea to notify the University or their staff. First, I am concerned about intimidation of Mr. Allen, the latter which will not permit for a full discovery and/or admission of all the facts. Also, all questions will be geared toward Mr. Allen's financial relationship with Mr. Shapiro and Capitol investments,however, this would also include an explanation of what Mr. Allen did with all of the money Mr. Shapiro and/or Capitol Investments gave Mr. Allen. I believe it is within Mr. Allen's financial accounting that all will be told. Let me know your thoughts.