

From: Christine Williams

Sent: Monday, December 8, 2025 11:17 AM

To: 'Daniel Stillman' <DStillman@ohaganmeyer.com>

Cc: McFarland, Robert W. <rmcfarland@mcguirewoods.com>; Sharada Pandey <SPandey@ohaganmeyer.com>; Winn, Kathryn Y. <kwinn@mcguirewoods.com>

Subject: RE: Letter from D. Stillman Regarding Name Change to Batten University [IMAN-ACTIVE.FID647178]

Good morning Dan –

I hope you had a nice weekend and thank you for the materials. In the interest of time, I am switching to an email response:

- We know everyone's time is valuable, so we do not want to waste any in the meeting on superfluous matters. We are well-versed in the history of the University and all that has been said to the press. To the extent that was going to be part of any presentation on the University's part, it is unnecessary.
- As is clear from our communications, we are seeking a substantive discussion on the decision-making process regarding the name change. There are no documents on the website that we requested. We have studied what is available. While we understand your position on "discovery," a productive meeting requires a shared set of facts. We request the University bring the "Early Analysis" (Agenda Item III.A) and "Consultations and Interviews" reports (Item III.B) for in-camera inspection during the meeting, even if copies are not provided. Same with the infamous white paper to the extent that is not included in either of the above.
- While the decision to change the name was made by the Board, it was only possible – and remains so – with the Batten family's permission. We believe a representative from the family would be an important part of the meeting and again, request their presence. To that end, is it possible for two other Board of Trustee members to attend in place of Dr. Black and Ms. Cordova? Both are non-voting participants in this decision, and we remain unclear on Dr. Black's role (nor does he appear to be a paid employee of the University according to available financial records).
- I believe this was your intent, but we are planning for there to be an open dialogue during the meeting with opportunities to ask questions, etc. throughout. My clients will also make an introduction and have materials to share.
- Finally, Mr. Robert Valvaho, Mr. Greg Plummer, and Mr. John Boyle will be attending the meeting with me on Thursday.

Thanks,

Christine Williams, Esq.

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