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March 2, 2001

VIA CERTIFIED MAIL

Myles Brand, President
INDIANA UNIVERSITY
Office of University Counsel
Bryan Hall 211
107 South Indiana Avenue
Bloomington, Indiana 47405-7000

Re: Tort Claims Notice Pursuant to Indiana Code §34-13-3 et seq.

Dear Mr. Brand:

The law firm of Yates & Leal, LLP by way of Russell E. Yates, represents Robert M. Knight.

Notice is hereby given of a tort claim pursuant to Indiana Code §34-13-3, *et seq.*, arising from the wrongful termination of Robert M. Knight and violation of his rights under the policies of Indiana University and the Indiana Open Door Law, IC 5-14-1.5, *et seq.* which occurred in and around September 2000 and the months following, continuing to this date, by an employee of Indiana University, Myles Brand, and its Board of Trustees. More specifically, Mr. Knight's legal claims against Indiana University, Myles Brand, and the Board of Trustees stemming from this wrongful termination include: (1) violation of the Indiana Open Door Law, (2) slander, (3) intentional infliction of emotional distress, (4) tortious interference with potential contracts, including employment, and (5) libel. The resulting damages to Mr. Knight include lost income, pain and suffering, mental humiliation, and interference with his ability to obtain subsequent employment, all totaling in excess of \$7,000,000. All of these actions undertaken by the Board of Trustees and Mr. Brand are well known to all at the Indiana University, but Indiana University has failed to appropriately handle the actions of its board or its president.

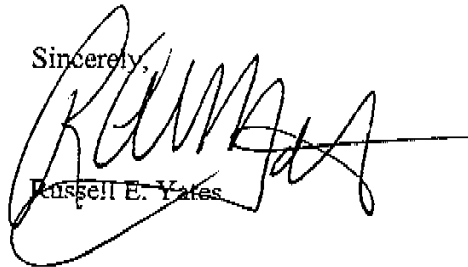
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Should Indiana University, Myles Brand, and the Board of Trustees desire to amicably resolve this matter, please contact Russell E. Yates at the number and address contained herein.

Sincerely,



Russell E. Yates

cc: Robert M. Knight

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