

From: [Heaphy, Timothy](#)
To: [Jeffrey F Konya](#); [Todd Jason Kress](#)
Cc: [May, Dustin](#); [Carroll, Fiona](#)
Subject: RE: Meeting for MW Review
Date: Wednesday, November 13, 2024 6:55:21 AM

This Message Is From an External Sender

This message came from outside your organization.

[Report Suspicious](#)

Thanks, Jeff. Coach Kress – we'll send you and the others on this email chain a Zoom invitation for this meeting at 1 pm PST tomorrow (Thursday, 11/14).

Looking forward to talking soon.

Tim Heaphy

Timothy J. Heaphy
Willkie Farr & Gallagher LLP
1875 K Street, N.W. | Washington, DC 20006-1238
Direct: [+1 202 303 1068](tel:+12023031068) | Mobile: [REDACTED]
theaphy@willkie.com | [vCard](#) | [www.willkie.com bio](http://www.willkie.com/bio)

From: Jeffrey Konya <jeff.konya@sjsu.edu>
Sent: Tuesday, November 12, 2024 9:52 PM
To: Todd Kress <todd.kress@sjsu.edu>
Cc: May, Dustin <dmay@calstate.edu>; Heaphy, Timothy <THeaphy@willkie.com>
Subject: Meeting for MW Review

***** EXTERNAL EMAIL *****

Coach Kress,

Per our discussion earlier today, the Mountain West Conference has informed the University that it is reviewing allegations of misconduct during the game against Colorado State on October 2, 2024. Specifically, the Conference is looking into allegations of contest manipulation and the targeting of harm towards a SJSU player. The Mountain West has hired independent, former volleyball coaches to review the game film and statistics as part of this review. In addition, the Mountain West has hired the law firm of Willkie Farr & Gallagher to conduct a review of the allegations. Attorney [Timothy Heaphy](#) is taking the lead on this review and is copied here. The Mountain West has requested to interview you in connection with this review. The Mountain West has informed

the University that the interviews with relevant SJSU team personnel and players is the final part of their review, and the Mountain West would like this completed as soon as possible. I will also plan to attend the interviews, along with University Counsel in his capacity as attorney for San Jose State. To be clear, University Counsel does not represent any employees individually. You may bring an advisor to this interview, including your own counsel.

As an employee of the University, the University requires that you participate in this review. Your meeting with Mr. Heaphy will take place, via Zoom, at 1pm. The Zoom session will take place at the Athletics Administration Building in the Conference Room. The meeting is anticipated to last 30 minutes. Please plan accordingly.

Thanks,

Jeff Konya
Director of Athletics
San Jose State University
Department of Intercollegiate Athletics



Important Notice: This email message is intended to be received only by persons entitled to receive the confidential information it may contain. Email messages to clients of Willkie Farr & Gallagher LLP presumptively contain information that is confidential and legally privileged; email messages to non-clients are normally confidential and may also be legally privileged. Please do not read, copy, forward or store this message unless you are an intended recipient of it. If you have received this message in error, please forward it back. Willkie Farr & Gallagher LLP is a limited liability partnership organized in the United States under the laws of the State of Delaware, which laws limit the personal liability of partners.

If you have any questions, please feel free to contact me. I look forward to seeing you on Thursday.
Thank you.

Alex Parker

Cell # - [REDACTED]

Message from Director of Athletics, re: Investigation

[REDACTED]

Per the discussion earlier today, the Mountain West Conference has informed the University that it is reviewing allegations of misconduct during the game against Colorado State on October 2, 2024. Specifically, the Conference is looking into allegations of contest manipulation and the targeting of harm towards a SJSU player. The Mountain West has hired independent, former volleyball coaches to review the game film and statistics as part of this review. In addition, the Mountain West has hired the law firm of Willkie Farr & Gallagher to conduct a review of the allegations. Attorney [Timothy Heaphy](#) is taking the lead on this review and is copied here. The Mountain West has requested to interview you in connection with this review, and the University encourages you to participate. I will also plan to attend the interviews, along with University Counsel in his capacity as attorney for San Jose State. To clarify, University Counsel (nor the Athletics Director) does not represent any students individually. You may bring an advisor to this interview, including family members, your own counsel, and/or other advisor. The Mountain West has informed the University that the interviews with relevant SJSU team personnel and players is the final part of their review, and the Mountain West would like this completed as soon as possible.

If you would like to meet with Mr. Heaphy (or his representative), the University plans to schedule 30 minute sessions for the interview on the evening of November 14, 2024 between 4pm and 9pm. Please contact me, Alex Parker, the Interim Associate AD for Compliance at alex.parker@sjsu.edu, to specify a time slot. The interview will be held at the SJSU Athletics Administration building in the Conference Room, and these offices are located on 7th Street across from the football stadium.

If you have any questions, please do not hesitate to contact me.

With Respect,

Jeff

Important Notice: This email message is intended to be received only by persons entitled to receive the confidential information it may contain. Email messages to clients of Willkie Farr & Gallagher LLP presumptively contain information that is confidential and legally privileged; email messages to non-clients are normally confidential and may also be legally privileged. Please do not read, copy, forward or store this message unless you are an intended recipient of it. If you have received this message in error, please forward it back. Willkie Farr & Gallagher LLP is a limited liability partnership organized in the United States under the laws of the State of Delaware, which laws limit the personal liability of partners.