

Law Offices of Craig P. Alexander

24681 La Plaza, Suite 250

Dana Point, CA 92629

Office: 949-481-6400 Facsimile: 949-242-2545

E-mail: craig@craigalexanderlaw.com

VIA ELECTRONIC (BRENDA.GEE@UCSF.EDU) AND U.S. MAIL

December 30, 2022

Ms. Brenda Gee
University of California, San Francisco
Office of the Executive Vice Chancellor and Provost
513 Parnassus Ave., S-115
San Francisco, CA 94143-0400

RE: California Public Records Act Requests (New) of Pro-Life San Francisco and Kristin Turner – CPRA Request No. Please advise

Dear Ms. Gee:

This firm represents Ms. Kristin Turner and Pro-Life San Francisco.

Under the **California Public Records Act § 6250 *et seq.***, Pro-Life San Francisco and Kristin Turner (“Requestors”) respectfully request to inspect all public records in the possession or control of the University of California, San Francisco (“UCSF”), for the following:

Request No. 1

Any and all communications (written (paper) or electronic or “e-mail”) by or between any staff / employees / volunteers of the Women's Options Center 6G, Zuckerberg San Francisco General Hospital, UCSF Center for Pregnancy Options, UCSF Women’s Health Center, and the UCSF Mount Zion Medical Center regarding the following (which we also offer as search terms for these communications):

- labor induction termination
- labor induction abortion
- labor induction termination AND elective
- labor induction abortion AND elective
- spontaneous abortion
- spontaneous delivery

My client is not interested in any disclosures of patients’ identities and thus if a responsive document has the name or other identifying information (SSN, home address,

etc.) of the patient in it, we ask that the University redact that portion of the record and deliver to us the remainder of the responsive document.

The time period for this request is from January 1, 2008 and the present date.

Request No. 2

Any and all communications (written (paper) or electronic or “e-mail”) between staff / employees / volunteers of UCSF’s IRB, the Human Research Protection Program, and the below listed grantees of NIH funding regarding fetal tissue donation, tissue collection, collection frequency, abortion appointments, pregnancy tissue, elective abortion, or labor induction. This specifically includes, but is not limited to, all minutes of meetings of the Human Research Protection Program.

- Arnold Kriegstein
<https://reporter.nih.gov/project-details/10165826>
- Julie Sneddon
<https://reporter.nih.gov/project-details/10124385>
- Joanna Halkias
<https://reporter.nih.gov/project-details/10196937>
- Elze Rackaityte
<https://reporter.nih.gov/project-details/9828772>
- Aparna Bhaduri
<https://reporter.nih.gov/project-details/9915985>
- Hanna Retallack
<https://reporter.nih.gov/project-details/9748849>
- Cheryl Stoddart
<https://reporter.nih.gov/project-details/9915757>
- Sarah Knox
<https://reporter.nih.gov/project-details/9404873>
- Peter Haggie
<https://reporter.nih.gov/project-details/9512925>
- David Rowitch - P01NS083513
<https://reporter.nih.gov/project-details/9525442>
- Timothy Henrich
<https://reporter.nih.gov/project-details/9546482>
- Sharof Tugizov
<https://reporter.nih.gov/project-details/9222002>
- Tracey Woodruff
<https://reporter.nih.gov/project-details/9320030>
- Jay Levy
<https://reporter.nih.gov/project-details/9052116>
- Nancy McNamara
<https://reporter.nih.gov/project-details/9056355>
- Trevor Burt
<https://reporter.nih.gov/project-details/9100632>

- Philip Ballard
<https://reporter.nih.gov/project-details/8788423>
- Samuel Hawgood
<https://reporter.nih.gov/project-details/8788424>
- Leland Dobbs
<https://reporter.nih.gov/project-details/8788425>
- Anne Marie Gillespie
<https://reporter.nih.gov/project-details/8788429>
- Marina Bershteyn
<https://reporter.nih.gov/project-details/8875791>
- Eric Huang
<https://reporter.nih.gov/project-details/8881355>
- Yuet Kan
<https://reporter.nih.gov/project-details/8917047>
- Dieter Gruenert
<https://reporter.nih.gov/project-details/8917048>
- Laurence Baskin
<https://reporter.nih.gov/project-details/8899340>

The time period for this request is from January 1, 2013 and the present date.

This request is for any and all writings and communications (including but not limited to, letters, electronic communications, e-mails, text messages, notes, fetal tissue logs, memorandums, messages) whether or not those communications are stored in your agencies' files and/or servers, it's consultants, or on the personal devices / accounts of your officials and employees such as private electronic mail accounts or cellular telephones. *City of San Jose v. Superior Court (Smith)* (2017) 2 Cal. 5th 608. This also includes any responsive records on cellular telephones issued by the Regents to any of Regents' employees.

**REQUEST FOR INFORMATION IN ELECTRONIC FORMAT PURSUANT TO
GOVERNMENT CODE SECTION 6253.9 (A) (2) & (E).**

We are seeking these records in any and all electronic formats your office keeps them in. Under the Public Records Act, you are required to deliver the information in whatever electronic format it is in no matter whether it is Excel, Word, WordPerfect or some other program or programs. Government Code section 6253.9 (a) (2) & (e). **Our request extends to receipt of this information in the electronic format your office maintains these records in.** Delivery of this information to me by electronic mail (Craig P. Alexander (craig@craigalexanderlaw.com)) or via a thumb drive or via a disk is fine. I can supply your agency with a thumb drive if needed. *Please advise what electronic format these records are kept in.*

In addition, if there are documents that satisfy this request that are in **both** electronic and paper formats, we offer to receive the electronic version of those records and forgo

inspection and potential photocopying of those paper copies. It is hoped that this will save your agency and us our time, trouble and expense.

If you anticipate that data compilation, extraction, or programming will be required to satisfy a request (per Section 6253.9(b)), please provide a written estimate and justification / explanation for same.

REQUEST FOR INSPECTION OF DOCUMENTS

For any records not delivered electronically, once we or our agent have had an opportunity to inspect these records, we will designate which documents we will wish to obtain copies from your office and its agents, employees, consultants, etc.

Also, on May 28, 2020 the California Supreme Court ruled that an agency may not charge a requestor of responsive documents for the act of searching for those documents or for review and redaction of any portion of a responsive document where the agency is claiming it is subject to an exemption or privilege. *National Lawyers Guild v. City of Hayward, et al* (2020) 9 Cal. 5th 488.

The California Public Records Act requires that public records responses be made within 10 days. If access to the records I am requesting will take longer, please contact me with information about when I might expect copies or the ability to inspect the requested records.

If you deny any or all of this request, please cite each specific statutory exemption you feel justifies the refusal to release the information and which official authorized the withholding of the responsive documents in whole or in part. Also, please provide all segregable portions of otherwise exempt material.

If you wish to discuss any of our requests for documents, please do not hesitate to contact me. Govt. Code section 6253.1.

Thank you in advance for your courtesy and cooperation in this matter.

Very truly yours,

Craig Alexander

Craig P. Alexander