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Sixth Night Coalition

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF YOLO**

Sixth Night Coalition,

*Petitioner,*

v.

Regents of the University of California,

*Respondent.*

CASE NO. CV2025-2061

**PETITION FOR WRIT OF  
MANDATE OR, IN THE  
ALTERNATIVE, COMPLAINT  
FOR DECLARATORY AND  
INJUNCTIVE RELIEF**

**INTRODUCTION**

1. This action is brought under the Public Records Act (California Government Code §§ 7920.000 *et seq.*) (“PRA”) for declaratory relief and a writ of mandate. Petitioner also seeks issuance of a writ under those provisions of the California Constitution securing public access to government documents and records. *See* Cal. Const., Art 1 § 3(b)(1).

2. Petitioner seeks to secure compliance of Respondent Regents of the University of California (“Regents”) in responding substantively and completely to Petitioner’s requests under the Public Records Act (“PRA”).

3. Respondent Regents have ignored or responded only partially to several PRA requests submitted by Petitioner.

4. Petitioner was thus left with no choice other than to initiate this legal action to enforce its right to complete responses, and to enforce Respondent Regents' obligation to provide complete responses.

## JURISDICTION AND VENUE

5. This Court has jurisdiction over this matter pursuant to Section 10 of Article VI of the California Constitution, Code of Civil Procedure Sections 1085 and 1060, California Government Code Sections 7923.000 through 7923.115, and California Education Code Section 92957.

6. Venue is proper in this Court as the public records at issue are located within the County of Yolo, and events giving rise to the claims occurred in the County of Yolo.

## PARTIES

7. Petitioner Sixth Night Coalition is an unincorporated association, most of whose members reside in the County of Yolo. Sixth Night Coalition operates/has operated under the name Stop Davis Antisemitism and used the related email address of stopdavisantisemitism@gmail.com. It has also used the email alias of davisoctober7th@gmail.com.

8. Respondent Regents of the University of California form a corporation which administers the University of California, a public trust. Regents are vested with the legal title to, and the management and disposition of, the property of the University of California, and are the legal custodian of the records at issue in this lawsuit. Regents possesses the power to sue and be sued on behalf of the University of California. Cal. Const. Art. 9, § 9.

9. At all relevant times hereto, Regents have been a “state agency” as that term is defined in California Government Code Section 7920.540.

10. Regents maintain their primary administrative offices at 1111 Franklin Street, 12th Floor, Oakland, CA 94607, and the Office of The General Counsel of The Regents has offices at 1111 Franklin Street, 8th Floor, Oakland, California 94607. Regents are a legal resident of Alameda County, California, and are amenable to service of process in Alameda County.

11. Sixth Night Coalition is a member of the public under the PRA, Cal. Gov. Code section 7920.520.

1           12. Sixth Night Coalition is beneficially interested in the outcome of these proceedings  
2 and has a clear, present, and substantial right to the relief sought herein and has no adequate remedy  
3 at law apart from that sought in this petition.

4                           **DISCLOSURE REQUIREMENTS UNDER THE**  
5                           **CALIFORNIA PUBLIC RECORDS ACT**

6           13. The State of California enacted its Public Records Act for the explicit purpose of  
7 increasing freedom of information by giving the public access to information in possession of  
8 public agencies. *See CBS, Inc. v. Block*, 42 Cal 3d. 646,651 (1986). The California legislature  
9 proclaimed that “[i]mplicit in the democratic process is the notion that government should be  
10 accountable for its actions. In order to verify accountability,” the legislature continued, the public  
11 “must have access to government files. Such access permits checks against the arbitrary exercise of  
12 official power and secrecy in the political process.” *CBS*, 42 Cal.3d at 651.

13           14. The PRA requires that all records “containing information relating to the conduct of  
14 the public’s business prepared, owned, used, or retained by any state or local agency” must be made  
15 publicly available for inspection and copying upon request, unless those records are exempt from  
16 disclosure. Cal. Gov. Code §§ 7922.525(a)-(b); 7920.530. If a respondent claims that some  
17 documents are exempt from disclosure, it must disclose all non-exempt material. Cal. Gov. Code §  
18 792.525.

19           15. “All public records are subject to disclosure unless the Legislature has expressly  
20 provided to the contrary.” *Sierra Club v Superior Court*, 57 Cal.4th 157, 165-66 (2013).

21           16. If a respondent claims that any request is completely or partially denied, that claim  
22 must be in writing and must set forth the names and titles or position of each person responsible for  
23 the denial. Cal. Gov. Code §§ 7922.540 (a)-(b).

24           17. The California Constitution also guarantees that the records of public agencies be  
25 open to the public. Laws such as the PRA and education code must be “broadly construed” if it  
26 furthers the people’s right to access and “narrowly construed” if it limits the right of access. Cal.  
27 Const. Art. 1, § 3(b)(2).  
28

18. Should the PRA requestor prevail in litigation, “the court shall award court costs and attorney fees to the requestor.” Cal. Gov. Code § 7923.115(a).

## FACTUAL ALLEGATIONS

19. University of California, Davis (“UC Davis”), is a branch of the University of California and is managed, administered and controlled by Respondent Regents. For convenience and specificity, this pleading refers to events occurring on the campus there and refers to faculty and staff for this branch as “UC Davis”; but as stated, Respondent Regents are responsible for all actions attributed herein to UC Davis, and Regents are the custodian of the records at issue in this lawsuit.

20. Since Hamas' October 7, 2023, attack on Israel during which hundreds of Hamas terrorists and other Gazans slaughtered, dismembered and tortured, raped, and kidnapped hundreds of Israelis, the UC Davis campus has been afflicted by open advocacy of violence and disruptive, harassing, and sometimes violent conduct particularly targeting Jews and Israelis. In most cases, UC Davis ignored this conduct, and in some cases UC Davis or its officers, staff, and teaching staff actively fostered and/or participated in it.

21. Examples of the advocacy of violence, and disruptive, harassing, and violent behavior, include:

- a. On October 10, 2023—a mere three days after Hamas perpetrated the worst slaughter of Jews since the Holocaust—UC Davis Assistant Professor Jemma DeCristo tweeted a threat against “Zionist journalists” on her X account (handle @jemmaisOKeh). Her post stated: “one group of ppl we have easy access to in the US is all these zionist journalists who spread propaganda and misinformation...they have houses with addresses, kids in school... they can fear their bosses, but they should fear us more,” accompanied by a knife emoji, an axe emoji, and three blood drop emojis.
- b. On December 23, 2023, Associated Students of UC Davis (ASUCD) Internal Vice President Aaminah Muhammad (ucdvcepresident)—a UC Davis student who is paid by UC Davis for her work as ASUCD IVP—reposted a call for death and violence against Zionists and a celebration of Hamas’ humiliation of an Israeli hostage that Batool Mohammed, vice president of UC Davis’ chapter of Students for Justice in Palestine (“SJP”), posted to Instagram the same date. The post included “i don’t care about them [zionists]! i wake up daily and pray for their d3@th and pray for their forever sentencing to hell. zionists are visious they are evil. they are not people they are not humans, they are devils wallah.” Mohammad’s post also supported terrorism: “i wholeheartedly with everything in me support every armed palestinian resistance group.”

- c. During the May 10, 2024 graduation ceremony for UC Davis School of Law, several graduating law school students spoiled the event for Jews and Israelis, and others, by exploiting the forum to advocate for Hamas and the Palestinians and against Israel. Quite a few students sported keffiyehs over their gowns, displayed Palestinian flags, signs such as “From the river to the sea” and “Resistance until victory,” and the inverted red triangle Hamas uses to target and threaten attack. University officials did nothing to prevent or stop the ceremony’s politicization.
- d. Between May 12 and May 18, 2024, there was an encampment on UC Davis Quad featuring anti-Israel graffiti, graffiti with terrorist group symbols, and signs with violent rhetoric posted around the “walls” of the encampment. A Jewish professor was physically obstructed from entering near the encampment to hear a talk. A Jewish community member giving a walking tour of UC Davis to a transfer student and her family were approached by a man with an oversized umbrella who shoved the umbrella into one of their faces, and hurled a variety of profanities and obscenities at them. Certain UC Davis faculty members actively supported the encampment, including conducting classes within this hostile-to-Jews area.
- e. The university allowed groups of masked individuals to invade classrooms and disrupt classes on May 27 and 28, 2024. The disrupters used drums and bullhorns, shouted that those present were complicit in “genocide”, chanted pro-Palestine chants, and carried signs. Campus police did not intervene. In one of the disrupted classes, a Jewish student (a descendant of Holocaust survivors) with an anxiety disorder suffered a panic attack when a mob of masked, screaming/chanting individuals broke into his classroom and stopped directly in front of him. Having a fight-or-flight reflex, he threw a water bottle at the invaders. Incredibly, UC Davis then investigated the Jewish victim for misconduct, although in the end it did not press charges. Additionally, the student was harassed by other students. The university also referred him to counseling, and did the same for other Jews who complained about the classroom invasions. To the best of our clients’ knowledge, not a single classroom invader has faced any adverse consequences for their actions on May 27-28.
- f. On October 7, 2024, exactly one year after the October 7, 2023 massacre, protestors (many with completely covered faces) disrupted classes and other events at the Memorial Union by marching through the building while chanting anti-Israel, anti-Zionist slogans with a drum and a loudspeaker/sound system. Chants included: “From the river to the sea, Palestine will be free”; “From the sea to the river, Palestine will live forever”; “There is only one solution: Intifada revolution”; “Intifada, Intifada Long live the Intifada”; “Israel doesn’t even have the right to exist”; and “2,4,6,8 We don’t want a Jewish state.” The disruptions were organized by a group called Students for Justice in Palestine. UC Davis police and other UC Davis administrators did nothing to stop them or enforce the anti-masking laws, despite requests from community members.
- g. On March 11, 2025, UC Davis Revolutionary Student Union and Students for Justice in Palestine chapter staged a “protest” event in the center of campus. In the presence of SJP members, followers, and faculty members, the keynote speaker openly advocated violence, specifically:

The sixth principle in which I’ve seen people waiver the most and get the most muddled is to support the right of resistance against Zionism

by any means necessary. This doesn't mean supporting resistance through art or literature or existence. *This means supporting armed resistance first and foremost. Armed resistance is the foundation of the Palestinian movement towards liberation; it's something you need to fully support and you cannot say you are part of this movement at all if you don't.* There is a narrative that we say Free Palestine but we don't agree with what resistance movements are doing. This is false. We need to back the resistance proudly (*emphasis added*).

22. Several individuals disturbed by these events, including UC Davis faculty, UC Davis alumni, and Davis community members—mostly but not entirely Jews—decided to pool their efforts to identify and expose what was happening at UC Davis.

23. Using the email aliases [davisoctober7th@gmail.com](mailto:davisoctober7th@gmail.com) and [stopdavisantisemitism@gmail.com](mailto:stopdavisantisemitism@gmail.com), petitioner Sixth Night Coalition submitted several records requests under the Public Records Act. Between June 2, 2024, and December 2, 2024, petitioner made 29 PRA submissions containing 70 specific records requests. All of these requests are itemized in the chart below.

| #                 | PRA number   | Req date | # | Request                                                                                                                                                                            |
|-------------------|--------------|----------|---|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>COLOR CODE</b> |              |          |   |                                                                                                                                                                                    |
|                   | Blue-Grey    |          |   | Policies.                                                                                                                                                                          |
|                   | Yellow       |          |   | NO RECORDS PRODUCED.                                                                                                                                                               |
|                   | Light Orange |          |   | Needle-in-haystack. UCD responded w/ gen. website.                                                                                                                                 |
|                   | Light Green  |          |   | Closed by UCD.                                                                                                                                                                     |
|                   | Light Teal   |          |   | Records produced [and considered closed?]                                                                                                                                          |
| 1                 | UCDPRA24303  | 06/02/24 | 1 | All specific provisions of all applicable policies, rules, regulations, and guidelines relevant to the responsibility of those using University space for non-academic activities. |
|                   | UCDPRA24303  | 06/02/24 | 2 | All specific provisions of all applicable policies, rules, regulations, and guidelines relevant to use of the Quad for protests, education, tabling, or other activities.          |
|                   | UCDPRA24303  | 06/02/24 | 3 | All specific provisions of all applicable policies, rules, regulations, and guidelines related to the Encampment.                                                                  |

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|----|---------------|----------|----|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1  | UCDPRA24303   | 06/02/24 | 4  | All specific provisions of all policies, rules, regulations, and guidelines that UC Davis considered might govern the Encampment or behavior of its occupants, irrespective of whether UC Davis actually considered them to be applicable to the Encampment.                                                                                                                                                                                                                                                                                                                                                                                  |
| 2  |               |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 3  |               |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 4  |               |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 5  | 2 UCDPRA24314 | 06/07/24 | 5  | 1. All records referring or related to PULP becoming a student organization.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 6  |               |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 7  | UCDPRA24314   | 06/07/24 | 6  | 2. All records comprising, referring or relating to any meeting or communication between any UC Davis representative and any representative of PULP or the Encampment.                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 8  |               |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 9  |               |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 10 | UCDPRA24314   | 06/07/24 | 7  | 3. All records of communications by or between any UC Davis representative(s) referring or relating to PULP or the Encampment.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 11 |               |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 12 | UCDPRA24314   | 06/07/24 | 8  | 4. All records referring or relating to whether any of the organizers, occupants, or supporters of PULP or the Encampment are or are not students.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 13 |               |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 14 | 3 UCDPRA24325 | 06/12/24 | 9  | Regarding the non-student organizers, occupants, or supporters of PULP or the Encampment, all records referring or relating their identities and affiliations or potential affiliations with anti-Israel, anti-Zionist, pro-Palestinian, anarchist, anti-capitalist, or anti-American organizations, including but not limited to: American Muslims for Palestine, National Students for Justice in Palestine, the Popular Front for the Liberation of Palestine, Hamas, Islamic Jihad, the Council on American Islamic Relations, Jewish Voice for Peace, J Street, J Street U, the Party for Socialism and Liberation, and Cops off Campus. |
| 15 |               |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 16 |               |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 17 |               |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 18 |               |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 19 |               |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 20 |               |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 21 |               |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 22 | UCDPRA24325   | 06/12/24 | 10 | All records referring or relating to any arrests, convictions, or other criminal background of any of the organizers, occupants, or supporters of PULP or the Encampment.                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 23 |               |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 24 |               |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 25 | UCDPRA24325   | 06/12/24 | 11 | All records referring or relating to any faculty members or staff members who have supported or participated in the Encampment.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 26 |               |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 27 |               |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 28 |               |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |

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|----|-------------|-------------|----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1  | UCDPRA24325 | 06/12/24    | 12       | All records comprising, referring, or relating to communications between any individual involved in planning the Whole Earth Festival, and any person, group, or organization associated with the Encampment.                                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                          |
| 2  |             |             |          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                          |
| 3  |             |             |          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                          |
| 4  | UCDPRA24325 | 06/12/24    | 13       | All records referring or relating to communications between any UCD staff or administrators and those associated with ASUCD meetings June 6 and May 16 including but not limited to video and audio, etc. AMENDED 07/07/24 to cover: Subjects include: Zionism, Jews, Muslims, Arabs, Palestine, Gaza, boycott, divestment, encampment, October 7, the ASUCD resolution accusing six professors of harassment, compliance with the Ralph Brown Open Meeting Act. |                                                                                                                                                                                                                                          |
| 5  |             |             |          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                          |
| 6  |             |             |          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                          |
| 7  |             |             |          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                          |
| 8  |             |             |          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                          |
| 9  |             |             |          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                          |
| 10 |             |             |          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                          |
| 11 | 4           | UCDPRA24326 | 06/13/24 | 14                                                                                                                                                                                                                                                                                                                                                                                                                                                               | All records referring or relating to HDAPP complaints by faculty or staff relating to antisemitism, anti-Zionism, Jew-hatred, or threats or harassment of Jewish members of the UC Davis community, from October 7, 2023 to the present. |
| 12 |             |             |          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                          |
| 13 |             |             |          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                          |
| 14 |             |             |          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                          |
| 15 | 5           | UCDPRA24331 | 06/18/24 | 15                                                                                                                                                                                                                                                                                                                                                                                                                                                               | All records comprising, referring, or relating to communications from, to, or between any UC Davis representative, relating to moving the venue of the Whole Earth Festival.                                                             |
| 16 |             |             |          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                          |
| 17 |             |             |          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                          |
| 18 |             |             |          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                          |
| 19 |             | UCDPRA24331 | 06/18/24 | 16                                                                                                                                                                                                                                                                                                                                                                                                                                                               | All records referring or relating to any discussions or decisions about how UC Davis would handle the Picnic Day Parade if non-entrants participated in the parade.                                                                      |
| 20 |             |             |          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                          |
| 21 |             |             |          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                          |
| 22 |             | UCDPRA24331 | 06/18/24 | 17                                                                                                                                                                                                                                                                                                                                                                                                                                                               | All records referring or relating to HDAAP complaints by faculty or staff relating to antisemitism, anti-Zionism, Jew-hatred, or threats or harassment of Jewish members of the UC Davis community, from October 7, 2023 to the present. |
| 23 |             |             |          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                          |
| 24 |             |             |          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                          |
| 25 |             | UCDPRA24331 | 06/18/24 | 18                                                                                                                                                                                                                                                                                                                                                                                                                                                               | All records referring or relating to HDAAP complaints by students relating to antisemitism, anti-Zionism, Jew-hatred, or threats or harassment of Jewish members of the UC Davis community, from October 7, 2023 to the present.         |
| 26 |             |             |          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                          |
| 27 |             |             |          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                          |

|    |   |             |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|----|---|-------------|----------|----|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1  | 6 | UCDPRA24332 | 06/18/24 | 19 | All records referring or relating to HDAAP complaints by faculty or staff relating to antisemitism, anti-Zionism, Jew-hatred, or threats or harassment of Jewish members of the UC Davis community, from January 1, 2010 October 6, 2023                                                                                                                                                                                                          |
| 2  |   |             |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 3  |   |             |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 4  |   | UCDPRA24332 | 06/18/24 | 20 | All records referring or relating to HDAAP complaints by students relating to antisemitism, anti-Zionism, Jew-hatred, or threats or harassment of Jewish members of the UC Davis community, from January 1, 2010 October 6, 2023.                                                                                                                                                                                                                 |
| 5  |   |             |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 6  |   |             |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 7  |   |             |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 8  |   | UCDPRA24332 | 06/18/24 | 21 | All records referring or relating to HDAAP complaints by students relating to Islamophobia, or threats or harassment of Muslim or Arab members of the UC Davis community, from January 1, 2010 to the present.                                                                                                                                                                                                                                    |
| 9  |   |             |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 10 |   |             |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 11 |   | UCDPRA24332 | 06/18/24 | 22 | All records referring or relating to any disciplinary action UC Davis has taken against any individual for: violating university policies prohibiting harassment or intimidation of members of the UC Davis Jewish community; committing vandalism in ostensible support of Palestine or against Israel, Zionists or Jews; violating UC Davis's reasonable time, place, and manner requirements for assembly, protest, campus speech, or tabling. |
| 12 |   |             |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 13 |   |             |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 14 |   |             |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 15 |   |             |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 16 |   |             |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 17 |   |             |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 18 | 7 | UCDPRA24347 | 06/26/24 | 23 | All records comprising video, photographs or other documentation related to graffiti at any UC Davis campus or facility that contains the following words or images: Free, Palestine, river, sea, genocide, blood, bloody hands, Israel, Nakba, PFLP, maps of Israel or Palestine, or other references to current anti-Israel or pro-Palestine rhetoric.                                                                                          |
| 19 |   |             |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 20 |   |             |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 21 |   |             |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 22 |   |             |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 23 |   |             |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 24 |   | UCDPRA24347 | 06/26/24 | 24 | All records referring or relating to complaints Students for Justice in Palestine HDAAP complaints by students relating to antisemitism, anti-Zionism, Jew-hatred, or threats or harassment of Jewish members of the UC Davis community, from January 1, 2010 October 6, 2023.                                                                                                                                                                    |
| 25 |   |             |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 26 |   |             |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 27 |   |             |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 28 |   |             |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                   |

|    |               |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|----|---------------|----------|----|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1  | UCDPRA24347   | 06/26/24 | 25 | All records referring or relating to all funds received from (or nationals of) Qatar, Saudi Arabia, the Arab League, or the Islamic Republic of Iran from September 11, 2001 to the present.                                                                                                                                                                                                                                              |
| 2  |               |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 3  |               |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 4  | UCDPRA24347   | 06/26/24 | 26 | All records referring or relating to the funding sources for each of the following organizations: Students for Justice in Palestine, Davis PSL chapter (Party for Socialism and Liberation), PULP (Popular University for the Liberation of Palestine), sfsucdavis (students for socialism at UCD), Spartacus youth club Davis, law students for a free Palestine, and Davis Graduate, Medical, Veterinary, and Law Students 4 Palestine. |
| 5  |               |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 6  |               |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 7  |               |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 8  |               |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 9  |               |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 10 | 8 UCDPRA24355 | 06/30/24 | 27 | Copies of all Instagram, blogs, and other social media content, tee-shirts and other paraphernalia (hereinafter "content"), by or on behalf of Tana Gallery, and/or the Department of Chicana/Chicano Studies, relating to antisemitism, Jews, Palestine, Hamas, PFLP, PULP, Hesbollah, SJP, the UC Davis Encampment, or "anticolonialism", from August 31, 2023 to the present.                                                          |
| 11 |               |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 12 |               |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 13 |               |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 14 |               |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 15 | UCDPRA24355   | 06/30/24 | 28 | All metadata related to the creation, generation, and/or posting of such content, including but not limited to the date and time of creation, generation, and posting, IP addresses of the hardware used, associated user IDs, whether such hardware is property of the University of California or the State of California, to which University officials, such hardware is assigned, but name, classification, department, etc.         |
| 16 |               |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 17 |               |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 18 |               |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 19 |               |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 20 |               |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 21 | UCDPRA24355   | 06/30/24 | 29 | All documents relating to the decision to delete or hide such content from public view on or about June 25 or June 26, 2024.                                                                                                                                                                                                                                                                                                              |
| 22 |               |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 23 | UCDPRA24355   | 06/30/24 | 30 | Documents describing funding of the Tana Gallery.                                                                                                                                                                                                                                                                                                                                                                                         |
| 24 | UCDPRA24355   | 06/30/24 | 31 | All policies and laws governing the use of University and/or state property for political purposes, and for supporting or promoting terrorist activities or organizations.                                                                                                                                                                                                                                                                |
| 25 |               |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 26 |               |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 27 |               |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 28 |               |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                           |

|    |    |             |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|----|----|-------------|----------|----|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1  | 9  | UCDPRA24365 | 07/04/24 | 32 | All records comprising, referring or relating to any meeting or communication between Chancellor, Gary May, Ari Kelman, and/or Karl Englebach, and representatives of Davis Faculty for Israel, Aggies for Israel, Hillel, or other Jewish organizations, faculty, staff, or students.                                                                                                                                                                                                                                                                                                                                          |
| 2  |    |             |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 3  |    |             |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 4  |    |             |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 5  |    | UCDPRA24365 | 07/04/24 | 33 | All applications and records relating to requests for permission to use any UC Davis space or resources (classrooms, open spaces, quad) and/or amplification for activities, lectures, teach-ins, encampments, films, and other gatherings from Sept 1, 2023 through June 30, 2024 from Students for Justice in Palestine, Davis PSL chapter (Party for Socialism and Liberation), PULP (Popular University for the Liberation of Palestine), sfsucdavis (students for socialism at UCD), Spartacus youth club Davis, law students for a free Palestine, and Davis Graduate, Medical, Veterinary, and Law Students 4 Palestine. |
| 6  |    |             |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 7  |    |             |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 8  |    |             |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 9  |    |             |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 10 |    |             |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 11 |    |             |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 12 |    |             |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 13 |    |             |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 14 |    | UCDPRA24365 | 07/04/24 | 34 | All records referring or relating to UC Davis's or the University of California's assessment of each congressional inquiry of any American university leader by the House of Representatives Committee of Education and the Workforce since October 7, 2023.                                                                                                                                                                                                                                                                                                                                                                    |
| 15 |    |             |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 16 |    |             |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 17 |    | UCDPRA24365 | 07/04/24 | 35 | The current employment status of Eddie Lampkin.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 18 |    |             |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 19 |    | UCDPRA24365 | 07/04/24 | 36 | All communications relating or referring to any of the above.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 20 |    | UCDPRA24365 | 07/04/24 | 37 | All documents relating to audits or assessments evaluating how any of the above content "promote[s] the role of art and culture as a viable community-building strategy" between UC Davis and the greater Woodland community."                                                                                                                                                                                                                                                                                                                                                                                                  |
| 21 |    |             |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 22 |    |             |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 23 |    |             |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 24 | 10 | UCDPRA24369 | 07/09/24 | 38 | 1. All records, irrespective of time, referring or relating to the decision to turn off the sprinkler system on the Quad during the encampment.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 25 |    |             |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 26 |    |             |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 27 |    |             |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 28 |    |             |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |

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|----|-------------|----------|----|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1  | UCDPRA24369 | 07/09/24 | 39 | 2. All records, irrespective of time, referring or relating to the cost or projected cost to restore the Quad after removal of the encampment, and sources or potential sources of funding.                                                                                                         |
| 2  |             |          |    |                                                                                                                                                                                                                                                                                                     |
| 3  |             |          |    |                                                                                                                                                                                                                                                                                                     |
| 4  | UCDPRA24369 | 07/09/24 | 40 | 3. All records, irrespective of time, referring or relating to the incremental or total cost associated with the encampment and sources or potential sources of funding.                                                                                                                            |
| 5  |             |          |    |                                                                                                                                                                                                                                                                                                     |
| 6  |             |          |    |                                                                                                                                                                                                                                                                                                     |
| 7  | UCDPRA24369 | 07/09/24 | 41 | 4. All records describing the meaning of each the symbols in the graffiti left behind on the Quad after the encampment was removed.                                                                                                                                                                 |
| 8  |             |          |    |                                                                                                                                                                                                                                                                                                     |
| 9  | UCDPRA24369 | 07/09/24 | 42 | 5. All records describing the meaning of each of the symbols that was displayed on the signs outside the encampment.                                                                                                                                                                                |
| 10 |             |          |    |                                                                                                                                                                                                                                                                                                     |
| 11 | UCDPRA24369 | 07/09/24 | 43 | 6. All records identifying who or what "Al Oassam" is that was chanted by UAW on campus on or about June 11, 2024.                                                                                                                                                                                  |
| 12 |             |          |    |                                                                                                                                                                                                                                                                                                     |
| 13 | UCDPRA24369 | 07/09/24 | 44 | 7. All records discussing whether UAW's protest on or about June 11, 2024 violated UC's restraining order against UAW.                                                                                                                                                                              |
| 14 |             |          |    |                                                                                                                                                                                                                                                                                                     |
| 15 | UCDPRA24369 | 07/09/24 | 45 | 8. All records relating or referring to George Habash and/or Leila Khaled.                                                                                                                                                                                                                          |
| 16 |             |          |    |                                                                                                                                                                                                                                                                                                     |
| 17 | UCDPRA24369 | 07/09/24 | 46 | 9. All records relating or referring to the Party for Socialism and Liberation and/or Cops Off Campus.                                                                                                                                                                                              |
| 18 | UCDPRA24369 | 07/09/24 | 47 | 10. All records relating or referring to conferral of the 2024 University Medal upon Brooke Morey.                                                                                                                                                                                                  |
| 19 |             |          |    |                                                                                                                                                                                                                                                                                                     |
| 20 | UCDPRA24369 | 07/09/24 | 48 | 11. All records relating or referring to Hannah Zeltzer, Stanford McConnehey, Batool Alawadi, and/or Yara Kaadan.                                                                                                                                                                                   |
| 21 |             |          |    |                                                                                                                                                                                                                                                                                                     |
| 22 | UCDPRA24369 | 07/09/24 | 49 | 12. All records relating or referring to Lysandra Dasilva, Nathan Orr, and/or Cheyenne Xiong.                                                                                                                                                                                                       |
| 23 | UCDPRA24369 | 07/09/24 | 50 | 13. All records relating or referring to the "National SJP 2024 Summer School."                                                                                                                                                                                                                     |
| 24 |             |          |    |                                                                                                                                                                                                                                                                                                     |
| 25 | UCDPRA24369 | 07/09/24 | 51 | 14. All records of communications, relating to any of the above items, directed to, by, or copying any of the following: Chancellor Gary May, Mike Sweeny, Ari Kelman, Joe Farrow, any other representative of the Chancellor's Office, UCOP, the Office of Student Affairs, HDAAP, or UC Davis PD. |
| 26 |             |          |    |                                                                                                                                                                                                                                                                                                     |
| 27 |             |          |    |                                                                                                                                                                                                                                                                                                     |
| 28 |             |          |    |                                                                                                                                                                                                                                                                                                     |

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|----|----|--------------|----------|----|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1  | 11 | UCDPRA24402  | 07/25/24 | 52 | Is Eddie Lampkin still employed by UC Davis? This question stems from a multitude of documentation of his antisemitism, anti-Americanism, and pro-terrorism. Furthermore, his use of UC Davis equipment to produce artistic pieces demonstrating his pro-terrorism is waste, fraud, and abuse of taxpayer-funded services.                                                                                                                                                                                                                                                                                                                                                                                                  |
| 2  |    |              |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 3  |    |              |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 4  |    |              |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 5  |    |              |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 6  | 12 | UCDPRA24466  | 08/29/24 | 53 | Is it accurate that “candidates are sought with research and teaching interests in war and critical militarisms embedded in understandings of settler colonialism and empire” for an Assistant Professor of Asian American Studies at UC Davis? Revised to: Please provide us any documents reflecting the hiring date of Mr. Jose Manuel Santillana Blanco. Additionally any hiring documents reflecting to whom was on his hiring panel and who made the hiring selection for him. <a href="https://americanstudies.ucdavis.edu/post-doc/jose-santillana-blanco">https://americanstudies.ucdavis.edu/post-doc/jose-santillana-blanco</a> We are specifically looking if his hiring date came after October 7, 2023. Thank |
| 7  |    |              |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 8  |    |              |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 9  |    |              |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 10 |    |              |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 11 |    |              |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 12 |    |              |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 13 |    |              |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 14 | 13 | UCDPRA24528  | 10/07/24 | 54 | Paperwork re whether 10/7/24 SJP event was authorized.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 15 |    |              |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 16 | 14 | UCDPRA 24533 | 10/11/24 | 55 | All records comprising, referring or relating to any meeting or communication between or from UCD administrators related to implementation of President Drake’s August 19, 2024 letter to the UC community from President Drake regarding UC campus climate efforts                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 17 |    |              |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 18 |    |              |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 19 |    |              |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 20 | 15 | UCDPRA 24534 | 10/11/24 | 56 | All records comprising, referring or relating to any request for the South MU patio or quad areas on October 7, 2024 including tabling of organizations.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 21 |    |              |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 22 | 16 | UCDPRA 24535 | 10/11/24 | 57 | All records comprising, referring or relating to any statement to employees with offices in Mrak Hall regarding lockdown of Mrak, work from home, or dismissal between October 7, 2023 and October 11, 2024 including reason for change of work location.                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 23 |    |              |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 24 |    |              |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 25 |    |              |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 26 |    |              |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 27 |    |              |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 28 |    |              |          |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |

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| 1  | 17 | UCDPRA 24536 | 10/11/24 | 58 | All records comprising, referring or relating to meetings including senior administration (Chancellor, chief of staff, Vice Chancellors, Chief Counsel, etc) and important campus leaders (including Police Chief) regarding understanding symbology of encampment graffiti between May 6, 2024 and October 10, 2024.                                                                              |
| 2  |    |              |          |    |                                                                                                                                                                                                                                                                                                                                                                                                    |
| 3  |    |              |          |    |                                                                                                                                                                                                                                                                                                                                                                                                    |
| 4  |    |              |          |    |                                                                                                                                                                                                                                                                                                                                                                                                    |
| 5  | 18 | UCDPRA 24537 | 10/11/24 | 59 | All records comprising, referring or relating to job announcements in College of Arts and Sciences that included colonialism in job vacancy announcement between January 1, 2020 and October 10, 2024.                                                                                                                                                                                             |
| 6  |    |              |          |    |                                                                                                                                                                                                                                                                                                                                                                                                    |
| 7  |    |              |          |    |                                                                                                                                                                                                                                                                                                                                                                                                    |
| 8  | 19 | UCDPRA 24538 | 10/11/24 | 60 | All records comprising, referring or relating to training required and completed by student senators related to principles of community, professionalism, Roberts Rules of Order, proper conduct by a governing body, and DEI from September 1 2023 through October 10, 2024.                                                                                                                      |
| 9  |    |              |          |    |                                                                                                                                                                                                                                                                                                                                                                                                    |
| 10 |    |              |          |    |                                                                                                                                                                                                                                                                                                                                                                                                    |
| 11 |    |              |          |    |                                                                                                                                                                                                                                                                                                                                                                                                    |
| 12 | 20 | UCDPRA 24539 | 10/11/24 | 61 | All records relating or referring to the Party for Socialism and Liberation and/or Cops Off Campus between September 1, 2023 and October 10, 2024.                                                                                                                                                                                                                                                 |
| 13 |    |              |          |    |                                                                                                                                                                                                                                                                                                                                                                                                    |
| 14 | 21 | UCDPRA24568  | 10/23/24 | 62 | All records discussing whether UAW's protest on or about June 11, 2024 violated the restraining order is The Regents of the University of California v. International Union, United Automobile, Aerospace and Agricultural Implement Workers of America, AFL-CIO, Local Union 4800, Orange County Superior Court #30-2024-01403666-CU-MC-CXC, and the restraining order was filed on June 7, 2024. |
| 15 |    |              |          |    |                                                                                                                                                                                                                                                                                                                                                                                                    |
| 16 |    |              |          |    |                                                                                                                                                                                                                                                                                                                                                                                                    |
| 17 |    |              |          |    |                                                                                                                                                                                                                                                                                                                                                                                                    |
| 18 |    |              |          |    |                                                                                                                                                                                                                                                                                                                                                                                                    |
| 19 |    |              |          |    |                                                                                                                                                                                                                                                                                                                                                                                                    |
| 20 | 22 | UCDPRA24569  | 10/23/24 | 63 | All records of communications, relating to any of the images painted on the quad within the encampment, directed to, by, or copying any of the following: Chancellor Gary May, Mike Sweeny, Ari Kelman, Joe Farrow, any other representative of the Chancellor's Office, UCOP, the Office of Student Affairs, HDAAP, or UC Davis PD from the start of the encampment until October 10, 2024.       |
| 21 |    |              |          |    |                                                                                                                                                                                                                                                                                                                                                                                                    |
| 22 |    |              |          |    |                                                                                                                                                                                                                                                                                                                                                                                                    |
| 23 |    |              |          |    |                                                                                                                                                                                                                                                                                                                                                                                                    |
| 24 |    |              |          |    |                                                                                                                                                                                                                                                                                                                                                                                                    |
| 25 |    |              |          |    |                                                                                                                                                                                                                                                                                                                                                                                                    |
| 26 |    |              |          |    |                                                                                                                                                                                                                                                                                                                                                                                                    |
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| 1  | 23 | UCDPRA24570 | 10/23/24 | 64 | All records of communications, relating or referring to the Party for Socialism and Liberation and/or Cops Off Campus between September 1, 2023 and October 22, 2024 directed to, by, or copying any of the following: Chancellor Gary May, Mike Sweeny, Ari Kelman, Joe Farrow, any other representative of the Chancellor's Office, UCOP, the Office of Student Affairs, HDAAP, or UC Davis PD. |
| 2  |    |             |          |    |                                                                                                                                                                                                                                                                                                                                                                                                   |
| 3  |    |             |          |    |                                                                                                                                                                                                                                                                                                                                                                                                   |
| 4  |    |             |          |    |                                                                                                                                                                                                                                                                                                                                                                                                   |
| 5  |    |             |          |    |                                                                                                                                                                                                                                                                                                                                                                                                   |
| 6  | 24 | UCDPRA24571 | 10/23/24 | 65 | Documentation regarding funding sources and amounts for UCD account 3-8060144, and account associated with Students for Justice in Palestine from January 2020 through October 20, 2024.                                                                                                                                                                                                          |
| 7  |    |             |          |    |                                                                                                                                                                                                                                                                                                                                                                                                   |
| 8  |    |             |          |    |                                                                                                                                                                                                                                                                                                                                                                                                   |
| 9  | 25 | UCDPRA24577 | 10/27/24 | 66 | Documentation related to reserving Storer 1322 October 17th at 7:30.                                                                                                                                                                                                                                                                                                                              |
| 10 |    |             |          |    |                                                                                                                                                                                                                                                                                                                                                                                                   |
| 11 | 26 | UCDPRA24578 | 10/28/24 | 67 | Documentation related to funding for KDVS radio station from January 1 2020 through October 26, 2024.                                                                                                                                                                                                                                                                                             |
| 12 |    |             |          |    |                                                                                                                                                                                                                                                                                                                                                                                                   |
| 13 | 27 | UCDPRA24579 | 10/27/24 | 68 | All records of communication and documentation related to campus event Noura Erakat live stream regarding November 1 presentation at King law school including and not limited to room requests and financial remuneration.                                                                                                                                                                       |
| 14 |    |             |          |    |                                                                                                                                                                                                                                                                                                                                                                                                   |
| 15 |    |             |          |    |                                                                                                                                                                                                                                                                                                                                                                                                   |
| 16 | 28 | UCDPRA24651 | 12/02/24 | 69 | UC Davis Policy and Procedure Manual Chapter 270, Properties Use and Extracurricular Activities Interim Section 20, Use and Reservation of University Properties/Event Arrangements dated 12/16/2003                                                                                                                                                                                              |
| 17 |    |             |          |    |                                                                                                                                                                                                                                                                                                                                                                                                   |
| 18 |    |             |          |    |                                                                                                                                                                                                                                                                                                                                                                                                   |
| 19 | 29 | UCDPRA24652 | 12/02/24 | 70 | Prior versions of UC Davis Policy and Procedure Manual Chapter 310, Communications and Technology Interim Section 27, Temporary Postings                                                                                                                                                                                                                                                          |
| 20 |    |             |          |    |                                                                                                                                                                                                                                                                                                                                                                                                   |
| 21 |    |             |          |    |                                                                                                                                                                                                                                                                                                                                                                                                   |

22           24.     E-correspondence from UC Davis confirming the above requests is attached (Exhibit  
23 "A").<sup>1</sup>

24           25.     Unfortunately, UC Davis stonewalled a number of these requests, providing no or  
25 only partial responses.  
26

27 \_\_\_\_\_  
28 <sup>1</sup> Petitioner has done its best to assemble only the confirming emails, but in the case of requests UCDPRA24402, UCDPRA24533, UCDPRA24534, and UCDPRA24535, that was not entirely possible.

**UC Davis Failed to Produce Records Without Explanation**

26. For 28 of these 70 specific requests, UC Davis ignored its own self-imposed due dates and produced no records, responsive or otherwise. The requests (described in the fifth column of the above chart at ¶23) are as follows: request numbers 5-18, 22-23, 25-26, 33, 38-40, 58, 62-65, and 68. They are highlighted in yellow on the above chart (¶23).

**The Policies Identified By UC Davis Postdate Request/Need Earlier Versions**

27. Seven of Petitioner's PRA requests sought university policies, rules, regulations, and/or guidelines on certain issues. These are request numbers 1-4, 31, and 69-70. They are highlighted in blue-grey on the chart (¶23 above).

28. UC Davis responded by sending current policies and/or links to various policies, but the university has recently revised several of its policies. With some exceptions, the links provided pull up current policies rather than the ones in effect at the time the requests were submitted. Additionally, some of the policies indicate that they were revised during the 2023-24 school year. Either way, our clients have not been furnished with the responsive policies applicable during all of the 2023-24 school year.

29. The missing responsive policies are denoted in the following chart:

| Policy                                            | Effective Date                                | Missing For                                                   |
|---------------------------------------------------|-----------------------------------------------|---------------------------------------------------------------|
| 270-05 Campus Organizations                       | 06/27/24                                      | 08/15/22-06/27/24                                             |
| 270-16 Fundraising on University Property         | 12/20/23                                      | 10/28/12 &/or<br>11/18/19-12/20/23                            |
| 270-20 Interim Use and Reservation                | 11/03/03-12/16/03;<br>09/19/24                | 12/16/03-09/19/24                                             |
| 310-25 Distribution of Information and Literature | 09/08/23, rev. 02/29/24                       | 09/08/23-02/29/24                                             |
| 400-01 Freedom of Expression                      | 02/27/24-08/21/24;<br>09/19/24, rev. 10/03/24 | 09/19/19-01/04/24;<br>01/04/24-02/27/24;<br>08/21/24-09/19/24 |

**Some UC Davis Responses Pointed Petitioner to a Needle In Haystack**

30. Regarding four of the 70 requests, UC Davis responded by citing to a general website. These are request numbers 19-21 and 24. They are highlighted in orange on the above chart (¶23).

31. Evidently, UC Davis believes it has fulfilled its duty by providing our clients with a haystack in which the requested information is hidden. California Government Code Section

7922.545 actually states that the agency may satisfy its obligation by “directing a member of the public to the location on the internet website where the public record is posted” (emphasis added).

32. Petitioner asked Respondent to provide a link to the webpage containing the requested information, or to provide the actual records that contain the requested information. Respondent ignored this request.

### **UC Davis Closed Several Requests Without Production**

33. UC Davis closed 21 of the 70 requests without producing any records. Numbered cumulatively, they are request numbers 27-29, 32, 34-37, 41-52, and 61, highlighted in light green in the above chart (¶23). This determination constituted a categorical refusal to respond.

### **Petitioner Presented its Concerns to UC Davis and Reiterated its Records Requests, But UC Davis Still Violated PRA Law By Improperly Failing to Produce Requested Records**

34. By letter dated February 11, 2025, petitioner (through counsel) sent UC Davis a letter demanding responses to those PRA requests to which it had produced no responses, and demanding more complete responses to those PRA requests to which the university responded only partially.<sup>2</sup> A copy of this letter is attached (Exhibit “B”).

35. As explained below, the refusals to produce records are legally insupportable.

- a. Request No. 27 (from UCDPRA24355) (“TANA Request”): The PRA request sought copies of all Instagram, blogs, and other social media content, tee-shirts and other paraphernalia (hereinafter “content”), by or on behalf of Tana Gallery, and/or the Department of Chicana/Chicano Studies, relating to antisemitism, Jews, Palestine, Hamas, PFLP, PULP, Hesbollah [a/k/a Hezbollah], SJP, the UC Davis Encampment, or “anticolonialism”, from August 31, 2023 to the present. UC Davis responded: “Pursuant to the California Public Records Act, UC Davis has conducted a reasonable search and determined that there are no responsive records.” Despite this denial, TANA’s website does in fact contain responsive material.
- b. Request No. 28 (from UCDPRA24355): The PRA request sought all metadata related to the creation, generation, and/or posting of such content, including but not limited to the date and time of creation, generation, and posting, IP addresses of the hardware used, associated user IDs, whether such hardware is property of the University of California or the State of California, to which University officials, such hardware is assigned, but name, classification, department, etc. UC Davis responded: “Based on the finding for item 1 [regarding the TANA Request discussed at No. 27 above], UC

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<sup>2</sup> In the course of preparing this pleading, petitioner revised the information in the chart attached to petitioner’s February 11 letter to respondent UC Davis. Petitioner clarified that one of the items listed under UCDPRA24577 in the February 11 chart was duplicative of UCDPRA24578, and could not confirm that UCDPRA24540 was sent. Therefore, petitioner has reduced the total number of individual items requested to 70. (The February 11 letter had identified 72 items.)

1 Davis has determined that there are no responsive records.” Given the  
2 inadequacy of UC Davis’ response to the TANA Request, Petitioner asked  
UC Davis to revise its response to this request as well.

3 c. Request No. 29 (from UCDPRA24355): The PRA request sought all  
4 documents relating to the decision to delete or hide the content sought in the  
5 TANA Request from public view on or about June 25 or June 26, 2024. UC  
6 Davis responded: “Based on the finding for item 1, UC Davis has determined  
that there are no responsive records.” Again, given the inadequacy of UC  
Davis’ response to the TANA Request, Petitioner asked UC Davis to revise  
its response to this request too.

7 d. Request No. 32 (from UCDPRA24365): The PRA request sought records of  
8 “any meeting or communication between Chancellor, Gary May, Ari  
9 Kelman, and/or Karl Englebach, and representatives of Davis Faculty for  
Israel, Aggies for Israel, Hillel, or other Jewish organizations, faculty, staff,  
or students.”

10 UC Davis denied the request as too burdensome. Specifically, UC Davis  
11 stated:

12 We have reviewed your request and must respectfully deny it in its  
13 current form. Even “a clearly framed request” may be unduly  
14 burdensome if it “requires an agency to search an enormous volume  
15 of data for a ‘needle in the haystack’ or conversely, ...compels the  
16 production of a huge volume of material.” California First  
17 Amendment Coalition v. Superior Ct. (1998) 67 Cal. App. 4th 159,  
18 166. The request, as submitted, is not limited to specific  
communications or other types of documents. Nor is it limited to a  
timeframe or specific key words search. These parameters are  
necessary for us to be able to conduct a search pursuant to the  
California Public Records Act. Additionally, an overbroad collection,  
such as this, may comprise of records that may be exempt from  
disclosure for the following reasons:

- 19 • Records that protect individual privacy under the Federal  
20 Educational Rights and Privacy Act (“FERPA”) (20 U.S.C.  
21 1232g, student privacy), FERPA is a federal law that protects  
the privacy of records directly pertaining to students, and  
generally prohibits the disclosure of such records to the public  
without the consent of the affected student(s). (34 CFR 99.30  
and 99.31).
- 22 • Personnel records. Gov. Code section § 7927.700 also allows  
23 for the non-disclosure of personnel records since disclosure  
24 would constitute an “unwarranted invasion of personal  
privacy.”
- 25 • Records exempt pursuant to the attorney-client privilege and  
26 attorney work product doctrine [Government Code Section  
7927.705].

27 Our office would like to assist you to make a focused request for  
28 identifiable records. If you feel you can focus this request to a  
reasonable number of specific records, please let me know and we

will continue to work with you to provide the documents you seek.

Petitioner's February 11, 2025, letter took UC Davis up on its suggestion and narrowed the scope of its PRA request. It limited the time period of the request to October 7, 2023-Present; and the parties to the request to those specifically identified above, i.e., any communications (including but not limited to emails, letters, and/or memoranda) between Chancellor Gary May, Ari Kelman, and/or Karl Englebach; with Davis Faculty for Israel, Aggies for Israel, and/or Hillel. To date, UC Davis has not responded as required by Cal. Gov't Code § 7922.535(a)-(b) by notifying Petitioner whether it has any responsive records; nor has it produced any responsive records to Petitioner.

- e. Request No. 34 (from UCDPRA24365): The PRA request sought records related to the U.S. House investigation, specifically, records "referring or relating to UC Davis' or the University of California's assessment of each congressional inquiry of any American university leader by the House of Representatives Committee of Education and the Workforce since October 7, 2023." UC Davis responded by denying this as "not a records request" and as "unclear".

Contrary to UC Davis' purported response, this records request is clear; Petitioner seeks UC Davis' records referring or relating to the U.S. House of Representatives Committee on Education and the Workforce investigation(s) of antisemitism in higher education that began following Hamas' October 7, 2023 attack. That includes, but is not limited, to all emails, letters, and/or memoranda concerning same. Naturally, it includes any correspondence between UC Davis and the Congressional committee directly, and any communication with any members of the committee such as Congresswoman Virginia Foxx, but it is broader than that. For example, it covers internal memoranda discussing any committee requests.

- f. Request No. 37 (from UCDPRA24365): The PRA request sought: "All documents relating to audits or assessments evaluating how any of the above content 'promote[s] the role of art and culture as a viable community-building strategy' between UC Davis and the greater Woodland community." [sic] UC Davis responded: "Not a records request." Contrary to UC Davis' comments, this is a clear records request; Petitioner seeks any assessments and/or audits done of the anti-Zionist materials identified in item 27 above and how it promoted UC Davis' purpose in setting up/supporting TANA.

- g. Request Nos. 41-42 (from UCDPRA24369): These PRA requests sought all records describing the meaning of each the symbols displayed on the encampment signs or in graffiti left on the Quad. UC Davis responded that these were informational and not records requests. Contrary to UC Davis' response, these are records requests. Petitioner seeks UC Davis records discussing the meaning of symbols in encampment signs and/or graffiti. By way of example, this request would apply to any emails and/or memoranda by UC Davis staffers describing, asking about, or explaining Hamas-supporters' use of an inverted red triangle to signify support for the Hamas terror organization.

- h. Request No. 43 (from UCDPRA24369): The PRA request sought all records identifying who or what "Al Qassam" is that was chanted by UAW on campus on or about June 11, 2024. UC Davis responded that these were informational and not records requests. Contrary to UC Davis' response, this is a records request. A simple search for any UC Davis records (including but

not limited to emails, letters, and/or memoranda referring to Al Qassam) should produce the responsive records; but UC Davis has not produced them to Petitioner.

- i. Request No. 44 (from UCDPRA24369): The PRA request sought all records discussing whether UAW’s protest on or about June 11, 2024 violated the University of California’s restraining order against UAW. UC Davis responded: “Records do not exist, because there is no restraining order against the UAW at UC Davis.”

UC Davis’ response is disingenuous at best. There was a restraining order against UAW, signed June 7, 2024, in the case of *Regents of the University of California v. UAW*, Case No. 30-2024-01403666-CU-MC-CXC, Superior Court of California, County of Orange. To the best of Petitioner’s knowledge, the order was effective throughout the University of California system; it was not limited to UCLA. Petitioner’s request seeks UC Davis records discussing the relationship between the June 7 injunction and the June 11 protest.

- j. Request No. 45 (from UCDPRA24369): The PRA request sought records referring/relating to George Habash, Leila Khaled. UC Davis responded:

The University’s ability to share personal information it maintains about individuals is governed by, among other laws, the California Information Practices Act (“IPA;” Calif. Civil Code § 1798 *et seq.*). In general, the IPA prohibits the University from disclosing “personal information” (broadly defined to include “any information that is maintained by an agency that identifies or describes an individual”), except in certain specified circumstances. The only IPA exception permits disclosure of such information if it is otherwise subject to disclosure under the California Public Records Act, which generally requires disclosure of public records. However, the PRA itself contains many exemptions to the general disclosure requirement, one of which is the privacy exemption § 7927.700 which provides that an agency is not required to disclose “Personnel, medical, or similar files, the disclosure of which would constitute an unwarranted invasion of personal privacy.” Therefore, under the PRA we would not conduct a search for the terms “George Habash” and/or “Leila Khaled.”

UC Davis’ response is nonsensical. **Both Habash and Khaled are recognized terrorists, and Habash is dead.**<sup>3</sup> UC Davis’ response appears designed to protect purported privacy records of recognized terrorists and/or a dead person. Contrary to the implication of UC Davis’ response, Habash and Khaled are not minors, UC Davis students, or US citizens, nor did

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<sup>3</sup> This is confirmed in State Department and other records. See US Department of State, Country Reports on Terrorism 2023, <https://www.state.gov/reports/country-reports-on-terrorism-2023/> (entry for the terrorist group Popular Front for the Liberation of Palestine identifies George Habash as its founder); National Counterterrorism Center, Counter Terrorism Guide, Popular Front for the Liberation of Palestine (PFLP), [https://www.dni.gov/nctc/ftos/pflp\\_fto.html](https://www.dni.gov/nctc/ftos/pflp_fto.html) (“George Habash [DECEASED] Founder and leader from 1967 to 2000; died in 2008 of natural causes”); ADL, “Leila Khaled: In Her Own Words” (October 2, 2020), <https://www.adl.org/resources/article/leila-khaled-her-own-words> (“Leila Khaled is a longtime active leader of the Popular Front for the Liberation of Palestine (PFLP) and is well-known for her role in the hijacking of two civilian airliners, TWA Flight 840 in 1969 (bound for Tel Aviv from Rome) and El Al flight 219 in 1970 (traveling from Amsterdam to New York City)”).

Petitioner's request seek medical information or other information that could be considered confidential.

- k. Request No. 46 (from UCDPRA24369): The PRA request sought records about the Party for Socialism and Liberation and/or Cops Off Campus. UC Davis responded that this was not a records request and that the request was supposedly unclear.

Contrary to UC Davis' comments, the record request is clear. Nevertheless, in its February 11, 2025 letter, Petitioner agreed to limit it to all records referring to Party for Socialism and Liberation and/or Cops Off Campus, including but not limited to emails, letters, and/or memoranda, for the time period October 7, 2023-present.

- l. Request No. 47 (from UCDPRA24369): The PRA request sought records regarding conferral of the 2024 University Medal on Brooke Morey. UC Davis responded with a link to a UC Davis public relations feature story, and otherwise denied the request, claiming that "student records" are private education records under FERPA (20 USC § 1232g) and exempt under PRA (Gov't Code § 7927.700). This response is, again, disingenuous. Petitioner did not seek personal records of Brooke Morey, but rather records about the UC Davis' decision to confer the award upon Morey, and the basis for that decision.

- m. Request No. 48 (from UCDPRA24369): The PRA request sought records relating/referring to Hannah Zeltzer, Stanford McConnehey, Batool Alawadi, and/or Yara Kaadan. UC Davis responded that any response would violate the California Information Practices Act (CA Civil Code § 1798 *et seq.*) and be exempt under PRA § 7927.700.

UC Davis' claim, that every UC Davis record referring or relating to these students is protected from disclosure, is difficult to credit given that all four students named are anti-Zionist activists who were in the news in relation to campus disruptions since October 7, 2023. For example, McConnehey is or was the spokesman for the Popular University for the Liberation of Palestine (PULP) when it set up the encampment at UC Davis in 2024. Kaadan, Alawadi, and Zeltzer are all activists with Students for Justice in Palestine, an organization which has disrupted several campuses to such an extent that they saw fit to suspend or terminate the organization. Petitioner's February 11, 2025 letter asked UC Davis to check whether these names came up in disclosable records, such as memoranda about the encampment, divestment vote, and general harassment of Jews on campus; UC Davis failed to respond to this inquiry or to provide responsive records.

- n. Request No. 49 (from UCDPRA24369): This PRA request sought records relating/referring to Lysandra Dasilva, Nathan Orr, and/or Cheyenne Xiong. UC Davis responded that any response would violate the California Information Practices Act (CA Civil Code § 1798 *et seq.*) and be exempt under PRA § 7927.700.

As Petitioner explained in the February 11 letter, these three individuals were **arrested for vandalizing the UC Davis campus.**<sup>4</sup> It is not credible that UC

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<sup>4</sup> See Yolo County District Attorney's Office Press Release, "Felony Charges Filed After Vandalism Incident on UC Davis Campus" (May 29, 2024), <https://yoloda.org/felony-charges-filed-after-vandalism-incident-on-uc-daviscampus/>

Davis would have zero records concerning the vandalism incidents and/or the one student's (Xiong's) involvement in them, records neither protected from disclosure by the California Information Practices Act nor exempt under the PRA.

o. Request No. 50 (from UCDPRA24369): The PRA request sought records relating or referring to "National SJP 2024 Summer School." UC Davis responded that this was not a records request and/or was unclear. Although Petitioner maintains that the initial request was clear, in its February 11, 2025 letter, Petitioner agreed to limit it to all records referring to National SJP 2024 Summer School (or some permutation thereof, such as National Students for Justice in Palestine 2024 Summer School), including but not limited to emails, letters, and/or memoranda. UC Davis failed to respond to this narrowed request or to provide responsive records.

p. Request No. 61 (from UCDPRA24539): The PRA request sought records regarding the "Party for Socialism and Liberation and/or Cops Off Campus between September 1, 2023 and October 10, 2024". UC Davis responded that the request was "overly broad" and "we are not able to conduct university-wide searches."

Contrary to UC Davis' comments, the record request is clear. Nevertheless, in its February 11, 2025 letter, Petitioner agreed to limit it to all records specifically referring to Party for Socialism and Liberation and/or Cops Off Campus, including but not limited to emails, letters, and/or memoranda, for the stated time period, similarly to the way it narrowed Request No. 46 in the same February 11 letter.

36. Also in the February 11 letter, Petitioner notified UC Davis that it was withdrawing Request Nos. 35 and 36 (both from UCDPRA24365); Request No. 51 (from UCDPRA24369); and Request No. 52 from (UCDPRA24402). (To reiterate, the numbering system is taken from the chart, ¶23 above.)

37. Respondent ignored the February 11, 2025, letter.

38. On March 11, 2025, petitioner (through counsel) sent a follow-up letter demanding a response to the February 11 demand letter within two weeks. A copy of this letter is attached (Exhibit "C").

39. Two weeks came and went with absolutely no response from UC Davis.

40. On April 10, 2025—four and a half weeks after petitioner's counsel sent its March 11 letter (Exhibit "C") and eight and a half weeks after petitioner's counsel sent its February 11

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("On May 24, 2024, Lysandra Dasilva, 31, of Davis, Nathan Orr, 30, of Davis, and Cheyenne Xiong, 20, of Hayfork, were arrested on suspicion of vandalism, after an act of vandalism occurred on UC Davis campus... Dasilva and Xiong were also charged with a one count of Resisting or Obstructing Public Officer, Peace Officer or Emergency Medical Technician.").

1 letter (Exhibit “B”)—petitioner’s counsel received an email from Heather Urzua, Legal Operations  
2 Manager, UC Legal – UC Davis Office of the Campus Counsel (Exhibit “D”). The April 10 email  
3 “confirm[ed] receipt” of counsel’s letter and asserted: “We will need an extended amount of time to  
4 thoroughly review your letter and spreadsheet and respond accordingly. We appreciate the narrowed  
5 information pertaining to some requests and will apply to those still open.”

6 41. UC Davis’ April 10 response failed to supply the missing records, failed to state  
7 clearly whether UC Davis had responsive records, and failed to state when those records would be  
8 provided. PRA law requires state agencies to provide the latter two within ten days after receiving  
9 an original PRA request. Cal. Gov’t Code § 7922.535(a)-(b). In this case, months after petitioner  
10 originally submitted the PRA requests, UC Davis failed and refused to provide this basic  
11 information even after receiving a subsequent, follow-up inquiry.

12 42. UC Davis never responded further. As of July 10, 2025, three months after it sent the  
13 April 10 email, UC Davis had still failed to remedy the deficiencies identified in the February 11  
14 letter.

15 43. That period is well beyond the length of time in which a public agency would be  
16 expected to respond to the requests submitted between June 2, 2024, and December 2, 2024.

17 **COUNT I**  
18 **(Writ of Mandate For Violation of Public Records Act)**  
19 **Cal. Gov. Code §§ 7920.000 *et seq.***

20 44. Petitioner incorporates by reference the allegations set forth in the preceding  
21 paragraphs as though set forth at length herein.

22 45. As noted above, the PRA imposed a clear ministerial duty on Respondent Regents  
23 (acting directly or through its agents at UC Davis) to determine, within ten (10) days after receiving  
24 Petitioner’s June 2, 2024-December 2, 2024, PRA requests, whether it was in possession of  
25 responsive, disclosable records. Once Regents determined that Petitioner’s requests sought  
26 disclosable public records, the PRA also imposed a clear duty on it to specify in its notification the  
27 estimated date and time when the requested records would be made available. *See* Cal. Gov. Code §  
28 7922.535(a).

46. As detailed above, Respondent Regents have failed to produce complete responses to Petitioner's PRA requests.

47. Regents have failed to perform their duties as required by the PRA, in violation of the California Constitution, Art. I, § 3, and the California Public Records Act, Cal. Gov. Code §§ 7920.000 *et seq.* Regents have thereby caused Petitioner to file suit to obtain the desired relief.

48. Petitioner has an immediate, vital, and beneficial interest in, and right to, Regents' performance of the aforementioned duties.

49. Petitioner has no other plain, speedy, and adequate remedy at law.

50. There are no material issues of fact necessary to the resolution of this matter that are or can be disputed.

51. Section 10 of Article VI of the California Constitution provides that superior courts and their judges have original jurisdiction in proceedings for extraordinary relief in the nature of mandamus, certiorari, and prohibition. California Government Code section 7923.000 permits any person to institute proceedings for injunctive or declaratory relief or writ of mandate to enforce his or her right to inspect or to receive a copy of any public record under the PRA. Code of Civil Procedure section 1085 authorizes the Court to issue a writ of mandate to Regents to compel performance of the aforementioned mandatory duties under the PRA.

**COUNT II**  
**(Declaratory Judgment and Injunctive Relief)**

52. Petitioner incorporates by reference the allegations set forth in the preceding paragraphs as though set forth at length herein.

53. An actual controversy exists between Petitioner and Respondent Regents regarding Regents' mandatory duties under the Public Records Act.

54. Regents' failure to perform their clear duties under the Public Records Act. is a violation of both statutes.

55. Petitioner is being irreparably harmed by Regents' failure to perform their duties under the Public Records Act., and they will continue to be irreparably harmed unless Regents are compelled to comply with the law.

1           56.     Petitioner has no plain, speedy, and adequate remedy at law.

2                                   **PRAYER FOR RELIEF**

3           WHEREFORE, Petitioner Sixth Night Coalition respectfully prays this Court:

4           1.       For issuance of a writ of mandate ordering Regents of the University of California to  
5 provide all records responsive to Petitioner's PRA requests as set forth above;

6           2.       Alternatively, if the Court does not order immediate production of the records  
7 requested, that it order Respondent to show cause why the records should not be released and  
8 prepare a log of withheld records, and thereafter issue a writ of mandate and injunction ordering the  
9 requested records to be disclosed;

10          3.       For an Order of declarative and injunctive relief, including but not limited to,  
11 declaring that the withheld materials are public records as defined by Government Code section  
12 7920.530, subdivision (a) in that they contain information relating to the conduct of the people's  
13 business, prepared, owned and retained by Respondent, and are subject to disclosure as writings of a  
14 public agency under Article 1, § 3(b) of the California Constitution; and declaring that Respondent  
15 violated the PRA by failing to promptly respond to Petitioner as they were required by law so to do,  
16 and also by failing to produce the requested responsive documents to Petitioner; and enjoining  
17 Regents to provide the requested records;

18          4.       For a finding that Petitioner is the prevailing party in this action;

19          5.       For an award of attorney fees and costs to Petitioner pursuant to Government Code  
20 section 7923.115 or any other applicable law;

21          6.       For judgment accordingly; and  
22  
23  
24  
25  
26  
27  
28

7. For such other and further relief as the Court may deem just and proper.

By:   
Mark Javitch (Local Counsel)  
**Javitch Law Office**  
3 East 3rd Avenue Suite 200  
San Mateo CA 94401  
Phone: (650) 781-8000  
Email: [mark@javitchlawoffice.com](mailto:mark@javitchlawoffice.com)

Johanna E. Markind (*Pro Hac Vice* to be filed)  
Lori Lowenthal Marcus (*Pro Hac Vice* to be filed)  
Jerome M. Marcus (*Pro Hac Vice* to be filed)  
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*Attorneys for Petitioner*  
Sixth Night Coalition

Dated: July 11, 2025

# **Exhibit Cover Page**

**EXHIBIT A**



Davis October 7th <davisoctober7th@gmail.com>

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**RE: Request UCDPRA24303**

1 message

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**Public Record** <publicrecords@ucdavis.edu>

Fri, Jun 7, 2024 at 2:32 PM

To: "DavisOctober7th@gmail.com" <DavisOctober7th@gmail.com>

Cc: Public Record <publicrecords@ucdavis.edu>

Dear Requester,

Please see the notes and links below in response to your public records request submitted on Sunday, June 2, 2024.

With the delivery of this email and the records herein we are considering your request, **UCDPRA24303**, closed. Should you have any questions or wish to request additional records please contact [publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu) or call (530) 754-6295.

Thank you,

Lara

**LARA H. STILLING**

**Information Practices Analyst**

**UC Legal – UC Davis Office of the Campus Counsel**

One Shields Avenue, Davis, CA 95616

(530) 752-3189

<https://campuscounsel.ucdavis.edu>

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1. All specific provisions of all applicable policies, rules, regulations, and guidelines relevant to the responsibility of those using University space for non-academic activities.

a. **Local Policy:** <https://ucdavispolicy.ellucid.com/documents/view/247/active/>

b. **UC Policy:** <https://policy.ucop.edu/doc/2710524/PACAOS-40>

2. All specific provisions of all applicable policies, rules, regulations, and guidelines relevant to use of the Quad for protests, education, tabling, or other activities.
  - a. The above policies apply to the Quad
  - b. Policy on tabling: <https://ucdavispolicy.ellucid.com/documents/view/367/active/>
3. All specific provisions of all applicable policies, rules, regulations, and guidelines related to the Encampment.
  - a. I think you may be looking for the Freedom of Expression policy which lists most of the time, place, and manner (TPM) regulations, but if not, please be more specific: <https://ucdavispolicy.ellucid.com/documents/view/37/active/>
4. All specific provisions of all policies, rules, regulations, and guidelines that UC Davis considered might govern the Encampment or behavior of its occupants, irrespective of whether UC Davis actually considered them to be applicable to the Encampment.
  - a. The above links are policies that may relate to this request, with the Freedom of Expression policy likely being the most relevant: <https://ucdavispolicy.ellucid.com/documents/view/37/active/>

No Name

---

**From:** [publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu) <[publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu)>

**Sent:** Sunday, June 2, 2024 7:10 PM

**To:** [DavisOctober7th@gmail.com](mailto:DavisOctober7th@gmail.com)

**Cc:** Public Record <[publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu)>

**Subject:** We received your request - UCDPRA24303

## Request Received Confirmation

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Your request has been received and a UC Davis Information Practices Coordinator will contact you within 10 calendar days\*. If you need immediate assistance, you may contact a member of our team at (530) 754-6295 or [publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu).

*\*Calendar days start from the first business day following the submission of your request.*



Davis October 7th <davisoctober7th@gmail.com>

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## We received your request - UCDPRA24314

3 messages

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**publicrecords@ucdavis.edu** <publicrecords@ucdavis.edu>

Fri, Jun 7, 2024 at 8:01 PM

To: DavisOctober7th@gmail.com

Cc: publicrecords@ucdavis.edu

## Request Received Confirmation

Your request has been received and a UC Davis Information Practices Coordinator will contact you within 10 calendar days\*. If you need immediate assistance, you may contact a member of our team at (530) 754-6295 or [publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu).

*\*Calendar days start from the first business day following the submission of your request.*

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**Public Record** <publicrecords@ucdavis.edu>

Mon, Jun 17, 2024 at 4:01 PM

To: "DavisOctober7th@gmail.com" <DavisOctober7th@gmail.com>

Cc: Public Record <publicrecords@ucdavis.edu>

Dear requester,

This email is to acknowledge your Public Records Act request submitted below. Appropriate UC Davis offices are being notified of your request and a search for the information is underway. All information identified as responsive to your request will be reviewed and made available for your access in accordance with relevant law and University policy. The estimated date for production is on or around August 9, 2024.

Although the requested records have not yet been gathered or reviewed, it is possible records may contain information exempt from disclosure pursuant to the Public Records Act and FERPA. However, this communication is not a determination regarding whether the requested records are necessarily exempt from disclosure. This office will provide you with a status update after the records have been reviewed.

If you have questions, please contact [publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu).

Sincerely,

**ASTRID DAVIS**

Information Practices Coordinator/Records Manager

UC Legal – UC Davis Office of the Campus Counsel

One Shields Avenue

Davis, CA 95616



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**From:** Public Record <[publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu)>  
**Sent:** Monday, June 10, 2024 4:34 PM  
**To:** Public Record <[publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu)>  
**Subject:** RE: We received your request - UCDPRA24314

Anonymous requester. Ack due date 6/17/24

1. All records referring or related to PULP becoming a student organization.
2. All records comprising, referring or relating to any meeting or communication between any UC Davis representative and any representative of PULP or the Encampment.
3. All records of communications by or between any UC Davis representative(s) referring or relating to PULP or the Encampment.
4. All records referring or relating to whether any of the organizers, occupants, or supporters of PULP or the Encampment are or are not students.

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**From:** [publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu) <[publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu)>  
**Sent:** Friday, June 7, 2024 8:01 PM  
**To:** [DavisOctober7th@gmail.com](mailto:DavisOctober7th@gmail.com)  
**Cc:** Public Record <[publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu)>  
**Subject:** We received your request - UCDPRA24314

## Request Received Confirmation

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Your request has been received and a UC Davis Information Practices Coordinator will contact you within 10 calendar days\*. If you need immediate assistance, you may contact a member of our team at (530) 754-6295 or [publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu).

*\*Calendar days start from the first business day following the submission of your request.*



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**From:** Public Record <[publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu)>  
**Sent:** Thursday, June 13, 2024 9:47 AM  
**To:** Public Record <[publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu)>  
**Subject:** RE: We received your request - UCDPRA24325

1. Regarding the non-student organizers, occupants, or supporters of PULP or the Encampment, all record referring or relating their identities and affiliations or potential affiliations with anti-Israel, anti-Zionist, pro-Palestinian, anarchist, anti-capitalist, or anti-American organizations, including but not limited to: American Muslims for Palestine, National Students for Justice in Palestine, the Popular Front for the Liberation of Palestine, Hamas, Islamic Jihad, the Council on American Islamic Relations, Jewish Voice for Peace, J Street, J Street U, the Party for Socialism and Liberation, and Cops off Campus.
2. All records referring or relating to any arrests, convictions, or other criminal background of any of the organizers, occupants, or supporters of PULP or the Encampment.
3. All records referring or relating to any faculty members or staff members who have supported or participated in the Encampment.
4. All records comprising, referring, or relating to communications between any individual involved in planning the Whole Earth Festival, and any person, group, or organization associated with the Encampment.
5. All records referring or relating to communications between any UCD staff or administrators and those associated with ASUCD meetings June 6 and May 16 including but not limited to video and audio, etc..

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**From:** [publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu) <[publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu)>  
**Sent:** Wednesday, June 12, 2024 8:24 PM  
**To:** [DavisOctober7th@gmail.com](mailto:DavisOctober7th@gmail.com)  
**Cc:** Public Record <[publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu)>  
**Subject:** We received your request - UCDPRA24325

## Request Received Confirmation

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Your request has been received and a UC Davis Information Practices Coordinator will contact you within 10 calendar days\*. If you need immediate assistance, you may contact a member of our team at (530) 754-6295 or [publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu).

*\*Calendar days start from the first business day following the submission of your request.*



Davis October 7th <davisoctober7th@gmail.com>

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## We received your request - UCDPRA24326

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**Public Record** <publicrecords@ucdavis.edu>

Mon, Jun 24, 2024 at 4:32 PM

To: "DavisOctober7th@gmail.com" <DavisOctober7th@gmail.com>

Cc: Public Record <publicrecords@ucdavis.edu>

Dear requester,

The purpose of this email is to confirm that we continue to work on your public records request received on June 13, 2024. As allowed pursuant to California Government Code § 7922.535, we require additional time to respond to your request.

We will respond to your request with a determination no later than the close of business on July 8, 2024.

If you have questions, please contact [publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu).

Sincerely,

**ASTRID DAVIS**

Information Practices Coordinator/Records Manager

UC Legal – UC Davis Office of the Campus Counsel

One Shields Avenue

Davis, CA 95616

<https://campuscounsel.ucdavis.edu/>



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**From:** Public Record <[publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu)>  
**Sent:** Friday, June 14, 2024 9:41 AM  
**To:** Public Record <[publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu)>  
**Subject:** RE: We received your request - UCDPRA24326

All records referring or relating to HDAPP complaints by faculty or staff relating to antisemitism, anti-Zionism, Jew-hatred, or threats or harassment of Jewish members of the UC Davis community, from October 7, 2023 to the present.

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**From:** [publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu) <[publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu)>  
**Sent:** Thursday, June 13, 2024 8:18 PM  
**To:** [Davisoctober7th@gmail.com](mailto:Davisoctober7th@gmail.com)  
**Cc:** Public Record <[publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu)>  
**Subject:** We received your request - UCDPRA24326

## Request Received Confirmation

---

Your request has been received and a UC Davis Information Practices Coordinator will contact you within 10 calendar days\*. If you need immediate assistance, you may contact a member of our team at (530) 754-6295 or [publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu).

*\*Calendar days start from the first business day following the submission of your request.*

# Subject: RE: We received your request - UCDPRA24331



**Public Record** <publicrecords@ucdavis.edu>  
to Public Record

Thu, Jun 20, 2024, 1

1. All records comprising, referring, or relating to communications from, to, or between any UC Davis representative, relating to moving the venue of the Whole Earth Festival.
2. All records referring or relating to any discussions or decisions about how UC Davis would handle the Day Parade if if non-entrants participated in the parade.
3. All records referring or relating to HDAAP complaints by faculty or staff relating to antisemitism, anti-Zionism, Jew- or threats or harassment of Jewish members of the UC Davis community, from October 7, 2023 to the present.
4. All records referring or relating to HDAAP complaints by students relating to antisemitism, anti-Zionism, Jew-hatred threats or harassment of Jewish members of the UC Davis community, from October 7, 2023 to the present.

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**From:** [publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu) <[publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu)>

**Sent:** Tuesday, June 18, 2024 6:48 PM

**To:** [DavisOctober7th@gmail.com](mailto:DavisOctober7th@gmail.com)

**Cc:** Public Record <[publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu)>

**Subject:** We received your request - UCDPRA24331

## Request Received Confirmation

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Your request has been received and a UC Davis Information Practices Coordinator will contact you within 10 calendar days\*. If you need immediate assistance, you may contact a member of our team at (530) 754-6295 or [publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu).

*\*Calendar days start from the first business day following the submission of your request.*

## Subject: RE: we received your request - UCDPRA24332



**Public Record** <publicrecords@ucdavis.edu>  
to Public Record

Thu, Jun 20, 2024, 1

1. All records referring or relating to HDAAP complaints by faculty or staff relating to antisemitism, anti-Zionism, Jew- or threats or harassment of Jewish members of the UC Davis community, from January 1, 2010 to October 6, 2023.
2. All records referring or relating to HDAAP complaints by students relating to antisemitism, anti-Zionism, Jew-hatred threats or harassment of Jewish members of the UC Davis community, from January 1, 2010 to October 6, 2023.
3. All records referring or relating to HDAAP complaints by students relating to Islamophobia, or threats or harassment of Muslim or Arab members of the UC Davis community, from January 1, 2010 to the present.
4. All records referring or relating to any disciplinary action UC Davis has taken against any individual for: violating university policies prohibiting harassment or intimidation of members of the UC Davis Jewish community; committing vandalism; ostensible support of Palestine or against Israel, Zionists or Jews; violating UC Davis's reasonable time, place, and requirements for assembly, protest, campus speech, or tabling.

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**From:** [publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu) <publicrecords@ucdavis.edu>

**Sent:** Tuesday, June 18, 2024 6:55 PM

**To:** [DavisOctober7th@gmail.com](mailto:DavisOctober7th@gmail.com)

**Cc:** Public Record <[publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu)>

**Subject:** We received your request - UCDPRA24332

### Request Received Confirmation

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Your request has been received and a UC Davis Information Practices Coordinator will contact you within 10 calendar days\*. If you need immediate assistance, you may contact a member of our team at (530) 754-6295 or [publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu).

*\*Calendar days start from the first business day following the submission of your request.*

## Subject: RE: we received your request - UCDPRA24347



**Public Record** <publicrecords@ucdavis.edu>  
to Public Record

Thu, Jun 27, 2024,

1. All records comprising video, photographs or other documentation related to graffiti at any UC Davis car or facility that contains the following words or images: Free, Palestine, river, sea, genocide, blood, black hands, Israel, Nakba, PFLP, maps of Israel or Palestine, or other references to current anti-Israel or pro Palestine rhetoric.
2. All records referring or relating to complaints Students for Justice in Palestine HDAAP complaints by students relating to antisemitism, anti-Zionism, Jew-hatred, or threats or harassment of Jewish members of the UC Davis community, January 1, 2010 to October 6, 2023.
3. All records referring or relating to all funds received from (or nationals of) Qatar, Saudi Arabia, the Arab League, or Islamic Republic of Iran from September 11, 2001 to the present.
4. All records referring or relating to the funding sources for each of the following organizations: Students for Justice in Palestine, Davis PSL chapter (Party for Socialism and Liberation), PULP (Popular University for Liberation of Palestine), sfsucdavis (students for socialism at UCD), Spartacus youth club Davis, law students for a free Palestine, and Davis Graduate, Medical, Veterinary, and Law Students 4 Palestine.

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**From:** [publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu) <[publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu)>

**Sent:** Wednesday, June 26, 2024 11:24 PM

**To:** [Davisoctober7th@gmail.com](mailto:Davisoctober7th@gmail.com)

**Cc:** Public Record <[publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu)>

**Subject:** We received your request - UCDPRA24347

## Request Received Confirmation

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Your request has been received and a UC Davis Information Practices Coordinator will contact you within 10 calendar days\*. If you need immediate assistance, you may contact a member of our team at (530) 754-6295 or [publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu).

*\*Calendar days start from the first business day following the submission of your request.*



Davis October 7th <davisoctober7th@gmail.com>

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**RE: We received your request - UCDPRA24355**

1 message

**Public Record** <publicrecords@ucdavis.edu>

Thu, Jul 11, 2024 at 8:27 AM

To: "DavisOctober7th@gmail.com" <DavisOctober7th@gmail.com>

Cc: Public Record <publicrecords@ucdavis.edu>

Dear Requester,

The purpose of this email is to confirm that we continue to work on your public records request below. As allowed pursuant to California Government Code section § 7922.535(b), we require additional time to respond to your request.

We will respond to your request with a determination no later than the close of business on Wednesday, July 24, 2024.

Should you have any questions, please contact our office at [publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu).

Sincerely,

Information Practices Team

UC Legal – UC Davis Office of the Campus Counsel

[UC Davis Office of the Campus Counsel](#)

[publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu)

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**From:** Public Record <[publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu)>

**Sent:** Monday, July 1, 2024 8:32 AM

**To:** Public Record <[publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu)>

**Subject:** FW: We received your request - UCDPRA24355

1. Copies of all Instagram, blogs, and other social media content, tee-shirts and other paraphernalia (hereinafter "content"), by or on behalf of Tana Gallery, and/or the Department of Chicana/Chicano Studies, relating to antisemitism, Jews, Palestine, Hamas, PFLP, PULP, Hesbollah, SJP, the UC Davis Encampment, or "anticolonialism", from August 31, 2023 to the present.

2. All metadata related to the creation, generation, and/or posting of such content, including but not limited to the date and time of creation, generation, and posting, IP addresses of the hardware used, associated user IDs, whether such hardware is property of the University of California or the State of California, to which University officials, such hardware is assigned, but name, classification, department, etc.

3. All documents relating to the decision to delete or hide such content from public view on or about June 25 or June 26, 2024.

4. Documents describing funding of the Tana Gallery.

5. All policies and laws governing the use of University and/or state property for political purposes, and for supporting or promoting terrorist activities or organizations.

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**From:** [publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu) <[publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu)>

**Sent:** Sunday, June 30, 2024 2:44 PM

**To:** [Davisoctober7th@gmail.com](mailto:Davisoctober7th@gmail.com)

**Cc:** Public Record <[publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu)>

**Subject:** We received your request - UCDPRA24355

## Request Received Confirmation

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Your request has been received and a UC Davis Information Practices Coordinator will contact you within 10 calendar days\*. If you need immediate assistance, you may contact a member of our team at (530) 754-6295 or [publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu).

*\*Calendar days start from the first business day following the submission of your request.*



Davis October 7th <davisoctober7th@gmail.com>

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**RE: We received your request - UCDPRA24365**

1 message

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**Public Record** <publicrecords@ucdavis.edu>

Fri, Jul 12, 2024 at 3:51 PM

To: "DavisOctober7th@gmail.com" <DavisOctober7th@gmail.com>

Cc: Public Record <publicrecords@ucdavis.edu>

Dear Requester,

The purpose of this email is to confirm that we continue to work on your public records request below. As allowed pursuant to California Government Code section § 7922.535(b), we require additional time to respond to your request.

We will respond to your request with a determination no later than the close of business on Friday, July 26<sup>th</sup>, 2024.

Should you have any questions, please contact our office at [publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu).

Sincerely,

Information Practices Team

UC Legal – UC Davis Office of the Campus Counsel

[UC Davis Office of the Campus Counsel](#)

[publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu)

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**From:** Public Record <[publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu)>

**Sent:** Friday, July 5, 2024 8:12 AM

**To:** Public Record <[publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu)>

**Subject:** FW: We received your request - UCDPRA24365

1. All records comprising, referring or relating to any meeting or communication between Chancellor, Gary May, Ari Kelman, and/or Karl Englebach, and representatives of Davis Faculty for Israel, Aggies for Israel, Hillel, or other Jewish organizations, faculty, staff, or students.
2. All applications and records relating to requests for permission to use any UC Davis space or resources (classrooms, open spaces, quad) and/or amplification for activities, lectures, teach-ins, encampments, films, and other gatherings from Sept 1, 2023 through June 30, 2024 from Students for Justice in Palestine, Davis PSL chapter (Party for Socialism and Liberation), PULP (Popular University for the Liberation of Palestine), sfsucdavis (students for socialism at UCD), Spartacus youth club Davis, law students for a free Palestine, and Davis Graduate, Medical, Veterinary, and Law Students 4 Palestine.
3. All records referring or relating to UC Davis's or the University of California's assessment of each congressional inquiry of any American university leader by the House of Representatives Committee of Education and the Workforce since October 7, 2023.
4. The current employment status of Eddie Lampkin.
5. All communications relating or referring to any of the above.

6. All documents relating to audits or assessments evaluating how any of the above content "promote[s] the role of art and culture as a viable community-building strategy" between UC Davis and the greater Woodland community."

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**From:** [publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu) <[publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu)>

**Sent:** Thursday, July 4, 2024 5:20 PM

**To:** [DavisOctober7th@gmail.com](mailto:DavisOctober7th@gmail.com)

**Cc:** Public Record <[publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu)>

**Subject:** We received your request - UCDPRA24365

## Request Received Confirmation

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Your request has been received and a UC Davis Information Practices Coordinator will contact you within 10 calendar days\*. If you need immediate assistance, you may contact a member of our team at (530) 754-6295 or [publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu).

*\*Calendar days start from the first business day following the submission of your request.*



Davis <stopdavisantisemitism@gmail.com>

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**RE: We received your request - UCDPRA24369**

1 message

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**Public Record** <publicrecords@ucdavis.edu>

Fri, Jul 19, 2024 at 4:28 PM

To: "Stopdavisantisemitism@gmail.com" <Stopdavisantisemitism@gmail.com>

Cc: Public Record <publicrecords@ucdavis.edu>

Dear Requester,

The purpose of this email is to confirm that we continue to work on your public records request, below. As allowed pursuant to California Government Code § 7922.535, we require additional time to respond to your request, due to the following circumstance:

- The need for consultation with the appropriate department to search for potentially responsive records

We will respond to your request no later than the close of business on Friday, August 2<sup>nd</sup>, 2024 with an estimated date that responsive documents will be made available.

Should you have any questions, please contact our office at (530)754-6295 or via email at [publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu)

Thank you,

**Heather Urzua**

**Legal Operations Manager**

**UC Legal – UC Davis Office of the Campus Counsel**

One Shields Avenue, Davis, CA 95616

Phone: 530-754-6295

<https://campuscounsel.ucdavis.edu/>

1. All records, irrespective of time, referring or relating to the decision to turn off the sprinkler system on the Quad during the encampment.
2. All records, irrespective of time, referring or relating to the cost or projected cost to restore the Quad after removal of the encampment, and sources or potential sources of funding.

3. All records, irrespective of time, referring or relating to the incremental or total cost associated with the encampment and sources or potential sources of funding.
4. All records describing the meaning of each the symbols in the graffiti left behind on the Quad after the encampment was removed.
5. All records describing the meaning of each of the symbols that was displayed on the signs outside the encampment.
6. All records identifying who or what "Al Qassam" is that was chanted by UAW on campus on or about June 11, 2024.
7. All records discussing whether UAW's protest on or about June 11, 2024 violated UC's restraining order against UAW.
6. All records relating or referring to George Habash and/or Leila Khaled.
7. All records relating or referring to the Party for Socialism and Liberation and/or Cops Off Campus.
8. All records relating or referring to conferral of the 2024 University Medal upon Brooke Morey.
9. All records relating or referring to Hannah Zeltzer, Stanford McConnehey, Batool Alawadi, and/or Yara Kaadan.
10. All records relating or referring to Lysandra Dasilva, Nathan Orr, and/or Cheyenne Xiong.
11. All records relating or referring to the "National SJP 2024 Summer School".
12. All records of communications, relating to any of the above items, directed to, by, or copying any of the following: Chancellor Gary May, Mike Sweeny, Ari Kelman, Joe Farrow, any other representative of the Chancellor's Office, UCOP, the Office of Student Affairs, HDAAP, or UC Davis PD.

We expect that any such documents or portions thereof withheld on the ostensible basis of attorney-client privilege will be appropriately redacted to properly only withhold actually privileged information, and any documents withheld in their entirety will be properly identified and disclosed.

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**From:** [publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu) <[publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu)>

**Sent:** Tuesday, July 9, 2024 6:25 AM

**To:** [Stopdavisantisemitism@gmail.com](mailto:Stopdavisantisemitism@gmail.com)

**Cc:** Public Record <[publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu)>

**Subject:** We received your request - UCDPRA24369

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## Request Received Confirmation

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Your request has been received and a UC Davis Information Practices Coordinator will contact you within 10 calendar days\*. If you need immediate assistance, you may contact a member of our team at (530) 754-6295 or [publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu).

*\*Calendar days start from the first business day following the submission of your request.*



Davis October 7th <davisoctober7th@gmail.com>

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## Re: We received your request - UCDPRA24402

1 message

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**Davis October 7th** <davisoctober7th@gmail.com>

Fri, Aug 2, 2024 at 3:23 AM

To: Public Record <publicrecords@ucdavis.edu>

Bcc: deannemeyer@gmail.com

UCD, he is listed right on your Tana Gallery facility page at <https://tana.ucdavis.edu/about>.

If he is indirectly paid through UC Davis funds, we just need a simple acknowledgment.

But if he is no longer an employee at your Tana Gallery, please remove him from your [@ucdavis.edu](https://tana.ucdavis.edu) webpage.

Thank you.

On Aug 2, 2024, at 1:52 AM, Public Record <[publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu)> wrote:

Good afternoon,

As responded to within UCDPRA24365 on July 25<sup>th</sup>, 2024, no employee was found matching the name “Eddie Lampkin”. Are you able to provide any other information to assist in our search? We have two directory options that are available as a public resource, [UC Davis Directory](#) and [Compensation at the University of California: Annual Wage \(ucop.edu\)](#).

Thank you,

**Heather Urzua**

**Legal Operations Manager**

**UC Legal – UC Davis Office of the Campus Counsel**

One Shields Avenue, Davis, CA 95616

Phone: 530-754-6295

<https://campuscounsel.ucdavis.edu/>

Is Eddie Lampkin still employed by UC Davis?

This question stems from a multitude of documentation of his antisemitism, anti-Americanism, and pro-terrorism.

Furthermore, his use of UC Davis equipment to produce artistic pieces demonstrating his pro-terrorism is waste, fraud, and abuse of taxpayer-funded services.

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**From:** [publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu) <[publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu)>  
**Sent:** Thursday, July 25, 2024 10:55 AM  
**To:** [davisoctober7th@gmail.com](mailto:davisoctober7th@gmail.com)  
**Cc:** Public Record <[publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu)>  
**Subject:** We received your request - UCDPRA24402

## Request Received Confirmation

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Your request has been received and a UC Davis Information Practices Coordinator will contact you within 10 calendar days\*. If you need immediate assistance, you may contact a member of our team at (530) 754-6295 or [publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu).

*\*Calendar days start from the first business day following the submission of your request.*



Davis October 7th &lt;davisoctober7th@gmail.com&gt;

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**RE: PRA for UC Davis Hiring Announcement UCDPRA24466**

1 message

**Public Record** <publicrecords@ucdavis.edu>

Tue, Sep 24, 2024 at 10:09 AM

To: "DavisOctober7th@gmail.com" &lt;DavisOctober7th@gmail.com&gt;

Cc: Public Record &lt;publicrecords@ucdavis.edu&gt;

Dear Requester,

Please see the attached documents regarding your public records request. Please note, a search waiver was approved for Professor Blanco (attached) waiving the recruitment for this appointment, so there was no search committee for this position. The search waiver was approved based on the "President's and Chancellor's Postdoctoral Fellowship Recipient" category, which is allowable based on the "[Guidelines Search Waivers and Search Exemptions for Academic Appointees at the University of California](#)". Additionally, redactions have been applied to information in the attached records that is protected from disclosure pursuant to § 7927.700 of the California Government Code, which provides that an agency is not required to disclose "Personnel, medical, or similar files, the disclosure of which would constitute an unwarranted invasion of personal privacy."

With the delivery of this email and the records herein we are considering your request closed. Should you have any questions or wish to request additional records please contact [publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu) or call (530) 754-6295.

Thanks,

Lara

**Lara H. Stilling****Information Practices Analyst****UC Legal – UC Davis Office of the Campus Counsel**

One Shields Avenue, Davis, CA 95616

Phone: 530-752-3189

<https://campuscounsel.ucdavis.edu/>

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**From:** Public Record <[publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu)>**Sent:** Thursday, September 12, 2024 4:15 PM**To:** Davis October 7th <[davisoctober7th@gmail.com](mailto:davisoctober7th@gmail.com)>

**Cc:** Public Record <[publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu)>

**Subject:** RE: PRA for UC Davis Hiring Announcement UCDPRA24466

Dear Requester,

This email is to acknowledge your Public Records Act request submitted below. Appropriate University of California offices are being notified of your request and a search for the information is underway. All information identified as responsive to your request will be reviewed, and made available for your access, in accordance with relevant law and University policy. The estimated date for production of the requested records is on or around October 17, 2024.

Your request number is **UCDPRA24466**. Please feel free to 'reply all' should you have any questions or need additional information as we work to complete your request. Please feel free to visit our [Campus Counsel](https://campuscounsel.ucdavis.edu) website for additional information concerning records requests.

Thanks,

Lara

**LARA H. STILLING**

**Information Practices Analyst**

**UC Legal – UC Davis Office of the Campus Counsel**

One Shields Avenue, Davis, CA 95616

(530) 752-3189

<https://campuscounsel.ucdavis.edu>

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**From:** Davis October 7th <[davisoctober7th@gmail.com](mailto:davisoctober7th@gmail.com)>

**Sent:** Friday, September 6, 2024 4:01 PM

**To:** Public Record <[publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu)>

**Cc:** UCOP-PRA <[pra@ucop.edu](mailto:pra@ucop.edu)>; Office of the Chancellor <[officeofthechancellor@ucdavis.edu](mailto:officeofthechancellor@ucdavis.edu)>; Michael Drake ([Michael.Drake@ucop.edu](mailto:Michael.Drake@ucop.edu)) <[michael.drake@ucop.edu](mailto:michael.drake@ucop.edu)>; Max Migdail <[Max.Migdail@sen.ca.gov](mailto:Max.Migdail@sen.ca.gov)>; Garrett Layton <[garrett.layton@asm.ca.gov](mailto:garrett.layton@asm.ca.gov)>

**Subject:** Re: PRA for UC Davis Hiring Announcement UCDPRA24454

UC Davis, we understand your technicality.

Please provide us any documents reflecting the hiring date of Mr. Jose Manuel Santillana Blanco. Additionally any hiring documents reflecting to whom was on his hiring panel and who made the hiring selection for him. <https://americanstudies.ucdavis.edu/post-doc/jose-santillana-blanco>

We are specifically looking if his hiring date came after October 7, 2023. Thank you.

Davis October 7th Coalition

On Fri, Sep 6, 2024 at 2:00 PM Public Record <[publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu)> wrote:

Dear Requester,

Your request is informational in nature and are not associated with a specific document. However, there are many publicly available websites for you to conduct your research. Please see [Welcome - AP Recruit \(ucdavis.edu\)](#) where you may search for positions you are interested in.

If you would like to request specific documents after you've had a chance to review all available online information, please submit a request for records via email or online portal. With the delivery of this email, we are considering your request closed.

Thank you,

**Heather Urzua**

**Legal Operations Manager**

**UC Legal – UC Davis Office of the Campus Counsel**

One Shields Avenue, Davis, CA 95616

Phone: 530-754-6295

<https://campuscounsel.ucdavis.edu/>

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**From:** Davis October 7th <[davisoctober7th@gmail.com](mailto:davisoctober7th@gmail.com)>

**Sent:** Tuesday, September 3, 2024 9:27 AM

**To:** Public Record <[publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu)>

**Subject:** Re: PRA for UC Davis Hiring Announcement

Thank you.

On Tue, Sep 3, 2024 at 8:28 AM Public Record <[publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu)> wrote:

Dear Requester,

As required under the California Public Records Act (Government code § 7922.535), UC Davis will acknowledge your request no later than the close of business on September 8, 2024. Please note, Government code § 7922.535(a) only requires a public agency to make a determination within 10 days as to whether or not a request is seeking records that are publicly disclosable and, if so, to provide the estimated date that the records will be made available. If additional time is needed to make a determination, Government code § 7922.535(b) allows for an additional 14 days.

Thanks,

Lara

**Lara H. Stilling**

**Information Practices Analyst**

**UC Legal – UC Davis Office of the Campus Counsel**

One Shields Avenue, Davis, CA 95616

Phone: 530-752-3189

<https://campuscounsel.ucdavis.edu/>

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**From:** Davis October 7th <[davisoctober7th@gmail.com](mailto:davisoctober7th@gmail.com)>

**Sent:** Friday, August 30, 2024 3:10 PM

**To:** Public Record <[publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu)>; UCOP-PRA <[pra@ucop.edu](mailto:pra@ucop.edu)>

**Cc:** Garrett Layton <[garrett.layton@asm.ca.gov](mailto:garrett.layton@asm.ca.gov)>; Max Migdail <[Max.Migdail@sen.ca.gov](mailto:Max.Migdail@sen.ca.gov)>; Tim Hoppe <[timothy.hoppe@ucop.edu](mailto:timothy.hoppe@ucop.edu)>; Michael Drake ([Michael.Drake@ucop.edu](mailto:Michael.Drake@ucop.edu)) <[michael.drake@ucop.edu](mailto:michael.drake@ucop.edu)>; Office of the Chancellor <[officeofthechancellor@ucdavis.edu](mailto:officeofthechancellor@ucdavis.edu)>

**Subject:** Re: PRA for UC Davis Hiring Announcement

UC Davis,

Please confirm our PRA filing for:

"Is it accurate that "candidates are sought with research and teaching interests in war and critical militarisms embedded in understandings of settler colonialism and empire" for an Assistant Professor of Asian American Studies at UC Davis?" We are asking because your employee posted that as a statement. If you need the attachments resent, please ask.

If you need clarification, please ask. Thank you.

The Davis October 7th Coalition

On Thu, Aug 29, 2024 at 12:00 PM Davis October 7th <[davisoctober7th@gmail.com](mailto:davisoctober7th@gmail.com)> wrote:

UC Davis,

Please see the PRA Request below. Thank you!

----- Forwarded message -----

From: **Davis October 7th** <davisoctober7th@gmail.com>

Date: Thu, Aug 29, 2024 at 11:57 AM

Subject: Re: PRA for UC Davis Hiring Announcement

To: UCOP-PRA <PRA@ucop.edu>

Cc: Office of the Chancellor <officeofthechancellor@ucdavis.edu>, Michael Drake (Michael.Drake@ucop.edu) <Michael.Drake@ucop.edu>, Max Migdail <Max.Migdail@sen.ca.gov>, Garrett Layton <garrett.layton@asm.ca.gov>, Tim Hoppe <Timothy.Hoppe@ucop.edu>

Thank you Regents.

Though we're unsure that UC Davis is in a place to handle responsibility like this. They did hire this professor AFTER he celebrated the October 7th massacre. Attached.

But we will also submit through UC Davis as well.

On Thu, Aug 29, 2024 at 11:36 AM UCOP-PRA <PRA@ucop.edu> wrote:

Hello,

The UC Office of the President (UCOP) has received your Public Records Act request, below. You would need to submit a request directly to the campus using the contact information here:

<https://www.ucop.edu/uc-legal/legal-resources/information-practices/information-practices-coordinators.html>

We consider this request closed.

Sincerely,

UCOP Public Records

UC, Office of the President

[1111 Franklin St.](#)

[Oakland, CA 94607](#)

[pra@ucop.edu](mailto:pra@ucop.edu)

---

**From:** Davis October 7th <davisoctober7th@gmail.com>

**Sent:** Thursday, August 29, 2024 10:34 AM

**To:** UCOP-PRA <PRA@ucop.edu>

**Cc:** Office of the Chancellor <[officeofthechancellor@ucdavis.edu](mailto:officeofthechancellor@ucdavis.edu)>; Michael Drake ([Michael.Drake@ucop.edu](mailto:Michael.Drake@ucop.edu)) <[Michael.Drake@ucop.edu](mailto:Michael.Drake@ucop.edu)>; Max Migdail <[Max.Migdail@sen.ca.gov](mailto:Max.Migdail@sen.ca.gov)>; Garrett Layton <[garrett.layton@asm.ca.gov](mailto:garrett.layton@asm.ca.gov)>; Tim Hoppe <[Timothy.Hoppe@ucop.edu](mailto:Timothy.Hoppe@ucop.edu)>  
**Subject:** PRA for UC Davis Hiring Announcement

**CAUTION: EXTERNAL EMAIL**

UC Regents,

Is it accurate that "candidates are sought with research and teaching interests in war and critical militarisms embedded in understandings of settler colonialism and empire" for an Assistant Professor of Asian American Studies at UC Davis?

Thank you.

The Davis October 7th Coalition

@davisoct7coalition



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**2 attachments**

-  **Santillana Blanco ASA - Asst Prof 3\_Redacted.pdf**  
278K
-  **SWR01529 - Jose Manuel Santillana Blanco Assistant Professor\_Redacted.pdf**  
354K



Davis October 7th &lt;davisoctober7th@gmail.com&gt;

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**RE: SJP Event Today at UC Davis - October 7th - UCDPRA24528**

1 message

**Public Record** <publicrecords@ucdavis.edu>

Thu, Oct 17, 2024 at 3:19 PM

To: "DavisOctober7th@gmail.com" &lt;DavisOctober7th@gmail.com&gt;

Cc: Public Record &lt;publicrecords@ucdavis.edu&gt;

Dear Requester,

Please see the attached documents regarding your public records request. Please note, some information has been redacted to protect the privacy of students, pursuant to The Family Educational Rights and Privacy Act ("FERPA") (20 U.S.C. § 1232g). FERPA is a federal law that protects the privacy of records directly pertaining to students, and generally prohibits the disclosure of such records to the public without the consent of the affected student(s) (34 CFR 99.30 and 99.31).

With the delivery of this email and the records herein we are considering your request closed. Should you have any questions or wish to request additional records please contact [publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu) or call (530) 754-6295.

Thank you,

Lara

**LARA H. STILLING****Information Practices Analyst****UC Legal – UC Davis Office of the Campus Counsel**

One Shields Avenue, Davis, CA 95616

(530) 752-3189

<https://campuscounsel.ucdavis.edu>

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**From:** Davis October 7th <davisoctober7th@gmail.com>**Sent:** Monday, October 7, 2024 9:14 AM**To:** Office of the Chancellor <officeofthechancellor@ucdavis.edu>; Michael Drake (Michael.Drake@ucop.edu) <michael.drake@ucop.edu>; Public Record <publicrecords@ucdavis.edu>**Cc:** UCOP-PRA <pra@ucop.edu>; Garrett Layton <garrett.layton@asm.ca.gov>; Pablo G Reguerin <pgreguerin@ucdavis.edu>; Max Migdail <max.migdail@sen.ca.gov>**Subject:** SJP Event Today at UC Davis - October 7th

UC Davis,

Was today's SJP event at UC Davis approved/authorized by campus leadership?

If so, please provide copies of the approval paperwork authorizing it.



Thank you.

Davis October 7th Coalition

#### 2 attachments

 **October 7 MU Patio Reservation\_Redacted.pdf**  
47K

 **Audit trail of SJP reservation on 10.7.24\_Redacted.pdf**  
788K



Davis &lt;stopdavisantisemitism@gmail.com&gt;

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**We received your request - UCDPRA24533**

2 messages

**publicrecords@ucdavis.edu** <publicrecords@ucdavis.edu>

Fri, Oct 11, 2024 at 7:24 AM

To: stopdavisantisemitism@gmail.com

Cc: publicrecords@ucdavis.edu

## Request Received Confirmation

Your request has been received and a UC Davis Information Practices Coordinator will contact you within 10 calendar days\*. If you need immediate assistance, you may contact a member of our team at (530) 754-6295 or [publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu).

*\*Calendar days start from the first business day following the submission of your request.*

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**Public Record** <publicrecords@ucdavis.edu>

Mon, Oct 21, 2024 at 5:19 PM

To: "stopdavisantisemitism@gmail.com" &lt;stopdavisantisemitism@gmail.com&gt;

Cc: Public Record &lt;publicrecords@ucdavis.edu&gt;

Good afternoon,

I write in response to your public records request below. UC Davis has conducted a search for records and provide the attached records and links.

1. [Policy Manager - MCN Healthcare \(ellucid.com\)](https://ellucid.com)
2. [Chancellor May: Looking Forward to the New Year | UC Davis Leadership](#)

With the delivery of these records and information, we consider request UCDPRA24533 closed. If you have questions, please contact [publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu).

Sincerely,

**ASTRID DAVIS****Information Practices Coordinator/Records Manager****UC Legal – UC Davis Office of the Campus Counsel**

One Shields Avenue

Davis, CA 95616

<https://campuscounsel.ucdavis.edu/>



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**From:** Public Record <[publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu)>  
**Sent:** Friday, October 11, 2024 8:02 AM  
**To:** Public Record <[publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu)>  
**Subject:** FW: We received your request - UCDPRA24533

All records comprising, referring or relating to any meeting or communication between or from UCD administrators related to implementation of President Drake's August 19, 2024 *letter to the UC community from President Drake regarding UC campus climate efforts*

[Quoted text hidden]

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**2 attachments**

-  **Campus Climate Notification Reporting Materials.eml**  
74K
-  **Re\_ Campus Climate Notification Reporting Materials.eml**  
374K



Davis &lt;stopdavisantisemitism@gmail.com&gt;

---

**We received your request - UCDPRA24534**

2 messages

**publicrecords@ucdavis.edu** <publicrecords@ucdavis.edu>

Fri, Oct 11, 2024 at 7:26 AM

To: stopdavisantisemitism@gmail.com

Cc: publicrecords@ucdavis.edu

## Request Received Confirmation

Your request has been received and a UC Davis Information Practices Coordinator will contact you within 10 calendar days\*. If you need immediate assistance, you may contact a member of our team at (530) 754-6295 or [publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu).

*\*Calendar days start from the first business day following the submission of your request.*

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**Public Record** <publicrecords@ucdavis.edu>

Thu, Oct 17, 2024 at 3:30 PM

To: "stopdavisantisemitism@gmail.com" &lt;stopdavisantisemitism@gmail.com&gt;

Cc: Public Record &lt;publicrecords@ucdavis.edu&gt;

Dear Requester,

Please see the attached documents regarding your public records request. Please note, some information has been redacted to protect the privacy of students, pursuant to The Family Educational Rights and Privacy Act ("FERPA") (20 U.S.C. § 1232g). FERPA is a federal law that protects the privacy of records directly pertaining to students, and generally prohibits the disclosure of such records to the public without the consent of the affected student(s) (34 CFR 99.30 and 99.31).

With the delivery of this email and the records herein we are considering your request closed. Should you have any questions or wish to request additional records please contact [publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu) or call (530) 754-6295.

Thank you,

Lara

**LARA H. STILLING**

**Information Practices Analyst**

**UC Legal – UC Davis Office of the Campus Counsel**

One Shields Avenue, Davis, CA 95616

(530) 752-3189

<https://campuscounsel.ucdavis.edu>

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**From:** Public Record <[publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu)>  
**Sent:** Friday, October 11, 2024 8:27 AM  
**To:** Public Record <[publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu)>  
**Subject:** FW: We received your request - UCDPRA24534

All records comprising, referring or relating to any request for the South MU patio or quad areas on October 7, 2024 including tabling of organizations.

[Quoted text hidden]

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**2 attachments**



**ProgramCheckInAttendanceByProductTypeDetailReport 10-7-24\_Redacted.pdf**  
205K



**1 Year of Genocide 10-7-24\_Redacted.pdf**  
12K



Davis &lt;stopdavisantisemitism@gmail.com&gt;

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**We received your request - UCDPRA24535**

2 messages

**publicrecords@ucdavis.edu** <publicrecords@ucdavis.edu>

Fri, Oct 11, 2024 at 7:30 AM

To: stopdavisantisemitism@gmail.com

Cc: publicrecords@ucdavis.edu

## Request Received Confirmation

Your request has been received and a UC Davis Information Practices Coordinator will contact you within 10 calendar days\*. If you need immediate assistance, you may contact a member of our team at (530) 754-6295 or [publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu).

*\*Calendar days start from the first business day following the submission of your request.*

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**Public Record** <publicrecords@ucdavis.edu>

Thu, Oct 17, 2024 at 4:15 PM

To: "stopdavisantisemitism@gmail.com" &lt;stopdavisantisemitism@gmail.com&gt;

Cc: Public Record &lt;publicrecords@ucdavis.edu&gt;

Dear Requester,

Please see the attached document regarding your public records request.

With the delivery of this email and the records herein we are considering your request closed. Should you have any questions or wish to request additional records please contact [publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu) or call (530) 754-6295.

Thank you,

Lara

**LARA H. STILLING****Information Practices Analyst****UC Legal – UC Davis Office of the Campus Counsel**

One Shields Avenue, Davis, CA 95616

(530) 752-3189

<https://campuscounsel.ucdavis.edu>

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**From:** Public Record <[publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu)>  
**Sent:** Friday, October 11, 2024 8:37 AM  
**To:** Public Record <[publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu)>  
**Subject:** FW: We received your request - UCDPRA24535

All records comprising, referring or relating to any statement to employees with offices in Mrak Hall regarding lockdown of Mrak, work from home, or dismissal between October 7, 2023 and ) October 11, 2024 including reason for change of work location.

[Quoted text hidden]



**Everbridge - Notification Messages 10.07.23-10.11.24.pdf**  
3798K



Davis <stopdavisantisemitism@gmail.com>

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**RE: We received your request - UCDPRA24536**

1 message

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**Public Record** <publicrecords@ucdavis.edu>

Thu, Oct 31, 2024 at 4:09 PM

To: "stopdavisantisemitism@gmail.com" <stopdavisantisemitism@gmail.com>

Cc: Public Record <publicrecords@ucdavis.edu>

Dear Requester,

The purpose of this email is to confirm that we continue to work on your public records request, below. As allowed pursuant to California Government Code § 7922.535, we require additional time to respond to your request, due to the following circumstance:

- The need for consultation with the appropriate department to search for potentially responsive records

We will respond to your request no later than the close of business on Thursday, November 14<sup>th</sup>, 2024 with an estimated date that responsive documents will be made available.

Should you have any questions, please contact our office at (530)754-6295 or via email at [publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu)

Thank you,

**Heather Urzua**

**Legal Operations Manager**

**UC Legal – UC Davis Office of the Campus Counsel**

One Shields Avenue, Davis, CA 95616

Phone: 530-754-6295

<https://campuscounsel.ucdavis.edu/>

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**From:** Public Record <[publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu)>

**Sent:** Friday, October 11, 2024 8:43 AM

**To:** Public Record <[publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu)>

**Subject:** FW: We received your request - UCDPRA24536

All records comprising, referring or relating to meetings including senior administration (Chancellor, chief of staff, Vice Chancellors, Chief Counsel, etc) and important campus leaders (including Police Chief) regarding understanding symbology of encampment graffiti between May 6, 2024 and October 10, 2024.

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**From:** [publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu) <[publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu)>

**Sent:** Friday, October 11, 2024 7:36 AM

**To:** [stopdavisantisemitism@gmail.com](mailto:stopdavisantisemitism@gmail.com)

**Cc:** Public Record <[publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu)>

**Subject:** We received your request - UCDPRA24536

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## Request Received Confirmation

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Your request has been received and a UC Davis Information Practices Coordinator will contact you within 10 calendar days\*. If you need immediate assistance, you may contact a member of our team at (530) 754-6295 or [publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu).

*\*Calendar days start from the first business day following the submission of your request.*



Davis <stopdavisantisemitism@gmail.com>

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**RE: We received your request - UCDPRA24537**

1 message

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**Public Record** <publicrecords@ucdavis.edu>

Tue, Oct 22, 2024 at 4:11 PM

To: "stopdavisantisemitism@gmail.com" <stopdavisantisemitism@gmail.com>

Cc: Public Record <publicrecords@ucdavis.edu>

Dear Requester,

This email is to acknowledge your Public Records Act request submitted below. Appropriate University of California offices are being notified of your request and a search for the information is underway. All information identified as responsive to your request will be reviewed, and made available for your access, in accordance with relevant law and University policy. The estimated date for production of the requested records is on or around December 2, 2024.

Your request number is **UCDPRA24537**. Please feel free to 'reply all' should you have any questions or need additional information as we work to complete your request. Please feel free to visit our [Campus Counsel](#) website for additional information concerning records requests.

Thanks,

Lara

**LARA H. STILLING**

**Information Practices Analyst**

**UC Legal – UC Davis Office of the Campus Counsel**

One Shields Avenue, Davis, CA 95616

(530) 752-3189

<https://campuscounsel.ucdavis.edu>

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All records comprising, referring or relating to job announcements in College of Arts and Sciences that included colonialism in job vacancy announcement between January 1, 2020 and October 10, 2024.

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**From:** [publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu) <[publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu)>

**Sent:** Friday, October 11, 2024 7:40 AM

**To:** [stopdavisantisemitism@gmail.com](mailto:stopdavisantisemitism@gmail.com)

**Cc:** Public Record <[publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu)>

**Subject:** We received your request - UCDPRA24537

## Request Received Confirmation

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Your request has been received and a UC Davis Information Practices Coordinator will contact you within 10 calendar days\*. If you need immediate assistance, you may contact a member of our team at (530) 754-6295 or [publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu).

*\*Calendar days start from the first business day following the submission of your request.*



Davis <stopdavisantisemitism@gmail.com>

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## RE: We received your request - UCDPRA24538

1 message

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**Public Record** <publicrecords@ucdavis.edu>

Tue, Oct 22, 2024 at 4:10 PM

To: "stopdavisantisemitism@gmail.com" <stopdavisantisemitism@gmail.com>

Cc: Public Record <publicrecords@ucdavis.edu>

Dear Requester,

This email is to acknowledge your Public Records Act request submitted below. Appropriate University of California offices are being notified of your request and a search for the information is underway. All information identified as responsive to your request will be reviewed, and made available for your access, in accordance with relevant law and University policy. The estimated date for production of the requested records is on or around December 2, 2024.

Your request number is **UCDPRA24538**. Please feel free to 'reply all' should you have any questions or need additional information as we work to complete your request. Please feel free to visit our [Campus Counsel](#) website for additional information concerning records requests.

Thanks,

Lara

**LARA H. STILLING**

**Information Practices Analyst**

**UC Legal – UC Davis Office of the Campus Counsel**

One Shields Avenue, Davis, CA 95616

(530) 752-3189

<https://campuscounsel.ucdavis.edu>

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All records comprising, referring or relating to training required and completed by student senators related to principles of community, professionalism, Roberts Rules of Order, proper conduct by a governing body, and DEI from September 1 2023 through October 10, 2024.

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**From:** [publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu) <publicrecords@ucdavis.edu>

**Sent:** Friday, October 11, 2024 7:48 AM

**To:** [stopdavisantisemitism@gmail.com](mailto:stopdavisantisemitism@gmail.com)

**Cc:** Public Record <[publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu)>

**Subject:** We received your request - UCDPRA24538

## Request Received Confirmation

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Your request has been received and a UC Davis Information Practices Coordinator will contact you within 10 calendar days\*. If you need immediate assistance, you may contact a member of our team at (530) 754-6295 or [publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu).

*\*Calendar days start from the first business day following the submission of your request.*



Davis &lt;stopdavisantisemitism@gmail.com&gt;

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**Party for Socialism and Liberation and Cops off Campus - UCDPRA24539**

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**Public Record** <publicrecords@ucdavis.edu>

Mon, Oct 14, 2024 at 10:49 AM

To: "stopdavisantisemitism@gmail.com" &lt;stopdavisantisemitism@gmail.com&gt;

Cc: Public Record &lt;publicrecords@ucdavis.edu&gt;

Dear Requester,

We received the following public records request from you on October 11, 2024:

**“All records relating or referring to the Party for Socialism and Liberation and/or Cops Off Campus between September 1, 2023 and October 10, 2024.”**

I am writing to let you know that we are not able to conduct university-wide searches. Additionally, your request is overly broad and does not identify a specific record(s) maintained by a department or custodian. Please review the [“tips and reminders”](#) for submitting a public records request, which can be found on the Office of the Campus Counsel website (copied here).

- **Identifying Records:** To help us provide records promptly, please provide specific information about the records you seek which may include:
  - Title of the document
  - Subject matter
  - Author's name
  - Date ranges
  - Names of departments, offices or employees who would likely have records

Your request number is **UCDPRA24539**. Please reply to this email with any additional details that will assist with your request. Although a search has not commenced, the information you provide will determine if you we will be able to process your request. **Please respond within 10 business days, or we will consider your request closed.**

Thank you,

Lara

**Lara H. Stilling**

Information Practices Analyst

UC Legal – UC Davis Office of the Campus Counsel

11/3/24, 2:51 PM

Gmail - Party for Socialism and Liberation and Cops off Campus - UCDPRA24539

One Shields Avenue, Davis, CA 95616

Phone: 530-752-3189

<https://campuscounsel.ucdavis.edu/>



Davis &lt;stopdavisantisemitism@gmail.com&gt;

---

**RE: We received your request - UCDPRA24568**

1 message

**Public Record** <publicrecords@ucdavis.edu>

Mon, Nov 4, 2024 at 4:45 PM

To: "stopdavisantisemitism@gmail.com" &lt;stopdavisantisemitism@gmail.com&gt;

Cc: Public Record &lt;publicrecords@ucdavis.edu&gt;

Dear Requester,

Our office received your below public records request. As responded to under public records request #UCDPRA24369 on August 2<sup>nd</sup>, 2024, records do not exist, as there is no restraining order against the UAW at UC Davis.

If you are seeking records related to "The Regents", please contact Office of the President Public Records Office, email link found at: [Office of Public Records guidelines for access | UCOP](#).

Thank you,

**Heather Urzua****Legal Operations Manager****UC Legal – UC Davis Office of the Campus Counsel**

One Shields Avenue, Davis, CA 95616

Phone: 530-754-6295

<https://campuscounsel.ucdavis.edu/>

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**From:** Public Record <[publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu)>**Sent:** Thursday, October 24, 2024 1:13 PM**To:** Public Record <[publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu)>**Subject:** FW: We received your request - UCDPRA24568

All records discussing whether UAW's protest on or about June 11, 2024 violated the restraining order is *The Regents of the University of California v. International Union, United Automobile, Aerospace and Agricultural Implement Workers of America, AFL-CIO, Local Union 4800*, Orange County Superior Court #30-2024-01403666-CU-MC-CXC, and the restraining order was filed on June 7, 2024.

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**From:** [publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu) <[publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu)>

**Sent:** Wednesday, October 23, 2024 8:21 PM

**To:** [stopdavisantisemitism@gmail.com](mailto:stopdavisantisemitism@gmail.com)

**Cc:** Public Record <[publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu)>

**Subject:** We received your request - UCDPRA24568

---

## Request Received Confirmation

---

Your request has been received and a UC Davis Information Practices Coordinator will contact you within 10 calendar days\*. If you need immediate assistance, you may contact a member of our team at (530) 754-6295 or [publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu).

*\*Calendar days start from the first business day following the submission of your request.*



Davis &lt;stopdavisantisemitism@gmail.com&gt;

---

**RE: We received your request - UCDPRA24569**

1 message

**Public Record** <publicrecords@ucdavis.edu>

Mon, Nov 4, 2024 at 2:48 PM

To: "stopdavisantisemitism@gmail.com" &lt;stopdavisantisemitism@gmail.com&gt;

Cc: Public Record &lt;publicrecords@ucdavis.edu&gt;

Dear Requester,

It appears the below request received by our office on October 23<sup>rd</sup>, 2024 is similar in description to the request our office is working on that was received October 11<sup>th</sup>, 2024 under the PRA #UCDPRA24536, copied in below for ease of reference. The slight difference is the updated custodian list, which we thank you for providing.

Before we begin a duplicate process, can you please confirm that these requests are essentially the same? If so, we can incorporate them into one request for you.

**UCDPRA24536, Received October 11<sup>th</sup>, 2024**

All records comprising, referring or relating to meetings including senior administration (Chancellor, chief of staff, Vice Chancellors, Chief Counsel, etc) and important campus leaders (including Police Chief) regarding understanding symbology of encampment graffiti between May 6, 2024 and October 10, 2024.

Thank you,

**Heather Urzua****Legal Operations Manager****UC Legal – UC Davis Office of the Campus Counsel**

One Shields Avenue, Davis, CA 95616

Phone: 530-754-6295

<https://campuscounsel.ucdavis.edu/>

---

**From:** Public Record <publicrecords@ucdavis.edu>**Sent:** Thursday, October 24, 2024 1:15 PM**To:** Public Record <publicrecords@ucdavis.edu>**Subject:** FW: We received your request - UCDPRA24569

All records of communications, relating to any of the images painted on the quad within the encampment, directed to, by, or copying any of the following: Chancellor Gary May, Mike Sweeny, Ari Kelman, Joe Farrow, any other representative of the Chancellor's Office, UCOP, the Office of Student Affairs, HDAAP, or UC Davis PD from the start of the encampment until October 10, 2024.

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**From:** [publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu) <[publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu)>

**Sent:** Wednesday, October 23, 2024 8:29 PM

**To:** [stopdavisantisemitism@gmail.com](mailto:stopdavisantisemitism@gmail.com)

**Cc:** Public Record <[publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu)>

**Subject:** We received your request - UCDPRA24569

---

## Request Received Confirmation

---

Your request has been received and a UC Davis Information Practices Coordinator will contact you within 10 calendar days\*. If you need immediate assistance, you may contact a member of our team at (530) 754-6295 or [publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu).

*\*Calendar days start from the first business day following the submission of your request.*



Davis <stopdavisantisemitism@gmail.com>

---

## We received your request - UCDPRA24570

2 messages

---

**publicrecords@ucdavis.edu** <publicrecords@ucdavis.edu>  
To: stopdavisantisemitism@gmail.com  
Cc: publicrecords@ucdavis.edu

Wed, Oct 23, 2024 at 8:36 PM

## Request Received Confirmation

Your request has been received and a UC Davis Information Practices Coordinator will contact you within 10 calendar days\*. If you need immediate assistance, you may contact a member of our team at (530) 754-6295 or publicrecords@ucdavis.edu.

*\*Calendar days start from the first business day following the submission of your request.*

---

**Public Record** <publicrecords@ucdavis.edu>  
To: "stopdavisantisemitism@gmail.com" <stopdavisantisemitism@gmail.com>  
Cc: Public Record <publicrecords@ucdavis.edu>

Mon, Nov 4, 2024 at 2:38 PM

Dear Requester,

The purpose of this email is to confirm that we continue to work on your public records request, below. As allowed pursuant to California Government Code § 7922.535, we require additional time to respond to your request, due to the following circumstance:

- The need for consultation with the appropriate department to search for potentially responsive records

We will respond to your request no later than the close of business on Monday, November 18<sup>th</sup>, 2024 with an estimated date that responsive documents will be made available.

Should you have any questions, please contact our office at (530)754-6295 or via email at publicrecords@ucdavis.edu.

Thank you,

**Heather Urzua**

**Legal Operations Manager**

**UC Legal – UC Davis Office of the Campus Counsel**

One Shields Avenue, Davis, CA 95616

Phone: 530-754-6295

<https://campuscounsel.ucdavis.edu/>

**All records of communications, relating or referring to the Party for Socialism and Liberation and/or Cops Off Campus between September 1, 2023 and October 22, 2024 directed to, by, or copying any of the following: Chancellor Gary May, Mike Sweeny, Ari Kelman, Joe Farrow, any other representative of the Chancellor's Office, UCOP, the Office of Student Affairs, HDAAP, or UC Davis PD.**

---

**From:** Public Record <publicrecords@ucdavis.edu>

**Sent:** Thursday, October 24, 2024 7:51 AM

**To:** Public Record <publicrecords@ucdavis.edu>

**Subject:** FW: We received your request - UCDPRA24570

[Quoted text hidden]



Davis <stopdavisantisemitism@gmail.com>

---

## We received your request - UCDPRA24571

2 messages

---

**publicrecords@ucdavis.edu** <publicrecords@ucdavis.edu>  
To: stopdavisantisemitism@gmail.com  
Cc: publicrecords@ucdavis.edu

Wed, Oct 23, 2024 at 8:46 PM

## Request Received Confirmation

Your request has been received and a UC Davis Information Practices Coordinator will contact you within 10 calendar days\*. If you need immediate assistance, you may contact a member of our team at (530) 754-6295 or publicrecords@ucdavis.edu.

*\*Calendar days start from the first business day following the submission of your request.*

---

**Public Record** <publicrecords@ucdavis.edu>  
To: "stopdavisantisemitism@gmail.com" <stopdavisantisemitism@gmail.com>  
Cc: Public Record <publicrecords@ucdavis.edu>

Fri, Nov 1, 2024 at 3:24 PM

Dear Requester,

This email is to acknowledge your Public Records Act request submitted below. Appropriate UC Davis offices are being notified of your request and a search for the information is underway. All information identified as responsive to your request will be reviewed and made available for your access in accordance with relevant law and University policy. The estimated date for production is on or around December 27, 2024. If there is any change to this date, I will let you know.

Although the requested records have not yet been gathered or reviewed, it is possible records may contain information exempt from disclosure pursuant to the Public Records Act. However, this communication is not a determination regarding whether the requested records are necessarily exempt from disclosure. This office will provide you with a status update after the records have been reviewed.

If you have questions, please contact publicrecords@ucdavis.edu.

Sincerely,

**ASTRID DAVIS**

Information Practices Coordinator/Records Manager

UC Legal – UC Davis Office of the Campus Counsel

One Shields Avenue

Davis, CA 95616

<https://campuscounsel.ucdavis.edu/>



---

**From:** Public Record <publicrecords@ucdavis.edu>  
**Sent:** Thursday, October 24, 2024 3:39 PM  
**To:** Public Record <publicrecords@ucdavis.edu>  
**Subject:** FW: We received your request - UCDPRA24571

Documentation regarding funding sources and amounts for UCD account 3-8060144, and account associated with Students for Justice in Palestine from January 2020 through October 20, 2024

[Quoted text hidden]



Davis <stopdavisantisemitism@gmail.com>

---

**FW: We received your request - UCDPRA24577**

1 message

---

**Public Record** <publicrecords@ucdavis.edu>

Fri, Nov 1, 2024 at 3:27 PM

To: "Stopdavisantisemitism@gmail.com" <stopdavisantisemitism@gmail.com>

Cc: Public Record <publicrecords@ucdavis.edu>

Dear Requester,

This email is to acknowledge your Public Records Act request submitted below. Appropriate UC Davis offices are being notified of your request and a search for the information is underway. All information identified as responsive to your request will be reviewed and made available for your access in accordance with relevant law and University policy. The estimated date for production is on or around December 27, 2024. If there is any change to this date, I will let you know.

Although the requested records have not yet been gathered or reviewed, it is possible records may contain information exempt from disclosure pursuant to the Public Records Act. However, this communication is not a determination regarding whether the requested records are necessarily exempt from disclosure. This office will provide you with a status update after the records have been reviewed.

If you have questions, please contact [publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu).

Sincerely,

**ASTRID DAVIS**

Information Practices Coordinator/Records Manager

UC Legal – UC Davis Office of the Campus Counsel

One Shields Avenue

Davis, CA 95616

<https://campuscounsel.ucdavis.edu/>



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**From:** Public Record <[publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu)>  
**Sent:** Monday, October 28, 2024 7:18 AM  
**To:** Public Record <[publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu)>  
**Subject:** FW: We received your request - UCDPRA24577

Documentation related to reserving Storer 1322 October 17th at 7:30.

---

**From:** [publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu) <[publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu)>  
**Sent:** Sunday, October 27, 2024 1:14 PM  
**To:** [stopdavisantisemitism@gmail.com](mailto:stopdavisantisemitism@gmail.com)  
**Cc:** Public Record <[publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu)>  
**Subject:** We received your request - UCDPRA24577

## Request Received Confirmation

---

Your request has been received and a UC Davis Information Practices Coordinator will contact you within 10 calendar days\*. If you need immediate assistance, you may contact a member of our team at (530) 754-6295 or [publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu).

*\*Calendar days start from the first business day following the submission of your request.*



Davis &lt;stopdavisantisemitism@gmail.com&gt;

---

## We received your request - UCDPRA24578

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**Public Record** <publicrecords@ucdavis.edu>

Fri, Nov 8, 2024 at 11:51 AM

To: "Stopdavisantisemitism@gmail.com" &lt;stopdavisantisemitism@gmail.com&gt;

Cc: Public Record &lt;publicrecords@ucdavis.edu&gt;

Dear requester,

UC Davis has conducted a search and found the following responsive information to your request below

### KDVS Budget

2020-2021 - <https://budget.asucd.ucdavis.edu/units/148/#summary>2021-2022 - <https://budget.asucd.ucdavis.edu/units/148/?year=2021>2022-2023 - <https://budget.asucd.ucdavis.edu/units/148/?year=2022>2023-2024 - <https://budget.asucd.ucdavis.edu/units/148/>

KDVS proposed budget for 2024-2025 comes from the following four revenue sources

1. Primary income source: The [ASUCD Base Fee](#) which is compulsory based fee \$357,250.34
2. Donations through fundraising
3. Self-revenue generation
4. Underwriting

With the delivery of this information, we consider request UCDPRA24578 closed. If you have questions or wish to submit future requests, please contact [publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu).

Sincerely,

**ASTRID DAVIS****Information Practices Coordinator/Records Manager****UC Legal – UC Davis Office of the Campus Counsel**

One Shields Avenue

Davis, CA 95616

<https://campuscounsel.ucdavis.edu/>



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**From:** Public Record <[publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu)>  
**Sent:** Monday, October 28, 2024 7:20 AM  
**To:** Public Record <[publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu)>  
**Subject:** FW: We received your request - UCDPRA24578

Documentation related to funding for KDVS radio station from January 1 2020 through October 26, 2024.

[Quoted text hidden]



Davis <stopdavisantisemitism@gmail.com>

---

**RE: We received your request - UCDPRA24579**

1 message

---

**Public Record** <publicrecords@ucdavis.edu>

Mon, Nov 4, 2024 at 9:58 AM

To: "stopdavisantisemitism@gmail.com" <stopdavisantisemitism@gmail.com>

Cc: Public Record <publicrecords@ucdavis.edu>

Dear Requester,

This email is to acknowledge your Public Records Act request submitted below. Appropriate University of California offices are being notified of your request and a search for the information is underway. All information identified as responsive to your request will be reviewed, and made available for your access, in accordance with relevant law and University policy. The estimated date for production of the requested records is on or around December 9, 2024.

Your request number is **UCDPRA24579**. Please feel free to 'reply all' should you have any questions or need additional information as we work to complete your request. Please feel free to visit our [Campus Counsel](#) website for additional information concerning records requests.

Thanks,

Lara

**LARA H. STILLING**

**Information Practices Analyst**

**UC Legal – UC Davis Office of the Campus Counsel**

One Shields Avenue, Davis, CA 95616

(530) 752-3189

<https://campuscounsel.ucdavis.edu>

---

All records of communication and documentation related to campus event Noura Erakat live stream regarding November 1 presentation at King law school including and not limited to room requests and financial remuneration.

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**From:** [publicrecords@ucdavis.edu](#) <[publicrecords@ucdavis.edu](#)>

**Sent:** Sunday, October 27, 2024 1:27 PM

**To:** [stopdavisantisemitism@gmail.com](#)

**Cc:** Public Record <[publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu)>

**Subject:** We received your request - UCDPRA24579

## Request Received Confirmation

---

Your request has been received and a UC Davis Information Practices Coordinator will contact you within 10 calendar days\*. If you need immediate assistance, you may contact a member of our team at (530) 754-6295 or [publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu).

*\*Calendar days start from the first business day following the submission of your request.*



Davis <stopdavisantisemitism@gmail.com>

---

## RE: We received your request - UCDPRA24651

1 message

---

**Public Record** <publicrecords@ucdavis.edu>

Fri, Dec 6, 2024 at 4:00 PM

To: "stopdavisantisemitism@gmail.com" <stopdavisantisemitism@gmail.com>

Cc: Public Record <publicrecords@ucdavis.edu>

Dear Requester,

Please see the attached document regarding your public records request.

With the delivery of this email and the records herein we are considering your request closed. Should you have any questions or wish to request additional records please contact [publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu) or call (530) 754-6295.

Thank you,

Lara

**Lara H. Stilling**

**Information Practices Analyst**

**UC Legal – UC Davis Office of the Campus Counsel**

One Shields Avenue, Davis, CA 95616

(530) 752-3189

<https://campuscounsel.ucdavis.edu>

---

UC Davis Policy and Procedure Manual  
Chapter 270, Properties Use and Extracurricular Activities  
Interim Section 20, Use and Reservation of University Properties/Event Arrangements  
dated 12/16/2003

---

**From:** [publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu) <[publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu)>

**Sent:** Monday, December 2, 2024 8:20 PM

**To:** [stopdavisantisemitism@gmail.com](mailto:stopdavisantisemitism@gmail.com)

**Cc:** Public Record <[publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu)>

**Subject:** We received your request - UCDPRA24651

# Request Received Confirmation

---

Your request has been received and a UC Davis Information Practices Coordinator will contact you within 10 calendar days\*. If you need immediate assistance, you may contact a member of our team at (530) 754-6295 or [publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu).

*\*Calendar days start from the first business day following the submission of your request.*



**270-20\_11.3.2003 final.pdf**  
12120K



Davis <stopdavisantisemitism@gmail.com>

---

## FW: We received your request - UCDPRA24652

1 message

---

**Public Record** <publicrecords@ucdavis.edu>

Fri, Dec 6, 2024 at 3:58 PM

To: "stopdavisantisemitism@gmail.com" <stopdavisantisemitism@gmail.com>

Cc: Public Record <publicrecords@ucdavis.edu>

Dear Requester,

Please see the attached documents regarding your public records request.

With the delivery of this email and the records herein we are considering your request closed. Should you have any questions or wish to request additional records please contact [publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu) or call (530) 754-6295.

Thank you,

Lara

**Lara H. Stilling**

**Information Practices Analyst**

**UC Legal – UC Davis Office of the Campus Counsel**

One Shields Avenue, Davis, CA 95616

(530) 752-3189

<https://campuscounsel.ucdavis.edu>

---

Prior versions of between 7/1/10 and 7/3/24 UC Davis Policy and Procedure Manual Chapter 310,  
Communications and Technology  
Interim Section 27, Temporary Postings  
Date: 7/3/2024

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**From:** [publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu) <[publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu)>

**Sent:** Monday, December 2, 2024 8:29 PM

**To:** [stopdavisantisemitism@gmail.com](mailto:stopdavisantisemitism@gmail.com)

Cc: Public Record <[publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu)>

Subject: We received your request - UCDPRA24652

## Request Received Confirmation

---

Your request has been received and a UC Davis Information Practices Coordinator will contact you within 10 calendar days\*. If you need immediate assistance, you may contact a member of our team at (530) 754-6295 or [publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu).

*\*Calendar days start from the first business day following the submission of your request.*

---

### 4 attachments



**310-27 (2).pdf**  
161K



**310-27.pdf**  
23K



**Interim 310-27.pdf**  
155K



**310-27 (1).pdf**  
148K

# **Exhibit Cover Page**

**EXHIBIT NUMBER B**

February 11, 2025

By email to [publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu)

Public Records Office  
UC Davis

**Re:   October 7 Coalition and Stop Davis Antisemitism  
      PRA Requests to University of California—Davis**

Dear Sir or Madam:

This office represents the October 7 Coalition (email: [DavisOctober7th@gmail.com](mailto:DavisOctober7th@gmail.com)) and Stop Davis Antisemitism (email: [stopdavisantisemitism@gmail.com](mailto:stopdavisantisemitism@gmail.com)), which both submitted Public Records Act (“PRA”) requests to the University of California Davis (“UC Davis”). Between June 2, 2024, and December 2, 2024, Stop Davis Antisemitism made 29 PRA submissions containing 72 specific records requests. All of these requests are itemized in the attached chart. Unfortunately, UC Davis has yet to produce a single record in response to several of our client’s requests, and has been less than forthcoming in its productions for several others.

### **UCD Failed to Produce Records Without Explanation**

For 29 of these 72 specific requests, UC Davis ignored its own self-imposed due dates and produced no records, responsive or otherwise. The requests (described in the fifth column of the attached chart) are as follows: request numbers 5-18, 22-23, 25-26, 33, 38-40, 58, 63-66, and 68-69. They are highlighted in **yellow** on the attached spreadsheet.

### **Policies Identified Postdate Request/Need Earlier Versions**

Seven of our clients’ PRA requests sought university policies, rules, regulations, and/or guidelines on certain issues. These are request numbers 1-4, 31, and 71-72. They are highlighted in **blue-grey** on the attached spreadsheet.

UC Davis responded by sending current policies and/or links to various policies, but the university has recently revised several of its policies. With some exceptions,<sup>1</sup> the links provided pull up current policies rather than the ones in effect at the time the requests were submitted.

---

<sup>1</sup> The exceptions are UC Davis Policy on Student Conduct and Discipline, effective September 1, 2020; Policy 270-70 regarding Major Events Sponsored by RSOs and Other Non-University Organizations, effective July 18, 2023; Policy 310-27 regarding Temporary Postings, effective July 3, 2024, and prior policies dating back to December 17, 2014; and Policy 400-01 regarding Freedom of Expression, effective January 4, 2024, rev. February 27, 2024.

Additionally, some of the policies indicate that they were revised during the 2023-24 school year. Either way, our clients have not been furnished with the responsive policies applicable during all of the 2023-24 school year.

**We request you provide copies of all missing responsive policies denoted in the following chart:**

| <b>Policy</b>                                     | <b>Effective Date</b>                         | <b>Missing For</b>                                            |
|---------------------------------------------------|-----------------------------------------------|---------------------------------------------------------------|
| 270-05 Campus Organizations                       | 06/27/24                                      | 08/15/22-06/27/24                                             |
| 270-16 Fundraising on University Property         | 12/20/23                                      | 10/28/12 &/or<br>11/18/19-12/20/23                            |
| 270-20 Interim Use and Reservation                | 11/03/03-12/16/03;<br>09/19/24                | 12/16/03-09/19/24                                             |
| 310-25 Distribution of Information and Literature | 09/08/23, rev. 02/29/24                       | 09/08/23-02/29/24                                             |
| 400-01 Freedom of Expression                      | 02/27/24-08/21/24;<br>09/19/24, rev. 10/03/24 | 09/19/19-01/04/24;<br>01/04/24-02/27/24;<br>08/21/24-09/19/24 |

### **Needle In Haystack**

Regarding four of the 72 requests, UCD responded by citing to a general website. These are request numbers 19-21 and 24. They are highlighted in **orange** on the attached spreadsheet.

Evidently, UCD believes it has fulfilled its duty by providing our clients with a haystack in which the requested information is hidden. California Government Code Section 7922.545 actually states that the agency may satisfy its obligation by “directing a member of the public to the *location on the internet website where the public record is posted*” (*emphasis added*). Kindly provide a link to the webpage containing the requested information, or provide actual records that contain the requested information; and not a haystack in which the information is hidden.

### **Closed Without Production**

UCD closed 21 of the 72 requests without producing any records. They are request numbers 27-29, 32, 34-37, 41-52, and 61. (The requests are numbered cumulatively; there is no individual PRA request with 61 subparts.) They are highlighted in **light green** on the attached spreadsheet.

We believe several of these refusals to produce records were legally insupportable. Below we have provided descriptions of the requests and explained our questions about UCD’s closure of the requests:

#### **27 (UCDPRA24355)**

PRA request: Copies of all Instagram, blogs, and other social media content, tee-shirts and other paraphernalia (hereinafter “content”), by or on behalf of Tana Gallery, and/or the Department of Chicana/Chicano Studies, relating to antisemitism, Jews, Palestine, Hamas, PFLP,

PULP, Hesbollah [a/k/a Hezbollah], SJP, the UC Davis Encampment, or “anticolonialism”, from August 31, 2023 to the present.

UCD response: “Pursuant to the California Public Records Act, UC Davis has conducted a reasonable search and determined that there are no responsive records.”<sup>2</sup>

Comment: TANA’s website does in fact contain responsive material. Attached please find a sample of same. We request UCD revise its response to avoid the need for unnecessary litigation/incursion of attorney fees owing to our clients.

**28 (UCDPRA24355)**

PRA request: All metadata related to the creation, generation, and/or posting of such content, including but not limited to the date and time of creation, generation, and posting, IP addresses of the hardware used, associated user IDs, whether such hardware is property of the University of California or the State of California, to which University officials, such hardware is assigned, but name, classification, department, etc.

UCD response: “Based on the finding for item 1, UC Davis has determined that there are no responsive records.”

Comment: Based on our comment to item 27 above, we request UCD review and revise its response to avoid the need for unnecessary litigation/incursion of attorney fees owing to our clients.

**29 (UCDPRA24355)**

PRA request: All documents relating to the decision to delete or hide such content from public view on or about June 25 or June 26, 2024.

UCD response: “Based on the finding for item 1, UC Davis has determined that there are no responsive records.”

Comment: Based on our comment to item 27 above, we request UCD review its records and produce all records relating to any decision to delete or hide the social media content described in item 27.

---

<sup>2</sup> Prior to this response, UCD sent an email dated July 25, 2024 referring our clients to a website, <https://chi.ucdavis.edu/programs>; this hyperlink is simply another needle-in-haystack response and is insufficient under Gov’t Code § 7922.545. No links to actual responsive records were ever provided, nor were any records produced in response to this request, before UCD closed it on August 30, 2024.

**32 (UCDPRA24365)**

PRA request sought records of “any meeting or communication between Chancellor, Gary May, Ari Kelman, and/or Karl Englebach, and representatives of Davis Faculty for Israel, Aggies for Israel, Hillel, or other Jewish organizations, faculty, staff, or students.”

UCD denied the request as too burdensome. Specifically:

We have reviewed your request and must respectfully deny it in its current form. Even “a clearly framed request” may be unduly burdensome if it “requires an agency to search an enormous volume of data for a ‘needle in the haystack’ or conversely, ...compels the production of a huge volume of material.” *California First Amendment Coalition v. Superior Ct.* (1998) 67 Cal. App. 4th 159, 166. The request, as submitted, is not limited to specific communications or other types of documents. Nor is it limited to a timeframe or specific key words search. These parameters are necessary for us to be able to conduct a search pursuant to the California Public Records Act. Additionally, an overbroad collection, such as this, may comprise of records that may be exempt from disclosure for the following reasons:

- Records that protect individual privacy under the Federal Educational Rights and Privacy Act (“FERPA”) (20 U.S.C. 1232g, student privacy), FERPA is a federal law that protects the privacy of records directly pertaining to students, and generally prohibits the disclosure of such records to the public without the consent of the affected student(s). (34 CFR 99.30 and 99.31).
- Personnel records. Gov. Code section § 7927.700 also allows for the non-disclosure of personnel records since disclosure would constitute an “unwarranted invasion of personal privacy.”
- Records exempt pursuant to the attorney-client privilege and attorney work product doctrine [Government Code Section 7927.705].

Our office would like to assist you to make a focused request for identifiable records. If you feel you can focus this request to a reasonable number of specific records, please let me know and we will continue to work with you to provide the documents you seek.

Comment: Thank you for offering to assist our clients in making a more focused request. The time period of the request is limited to October 7, 2023-Present. The parties to the request are limited to those specifically identified above, i.e., any communications (including but not limited to emails, letters, and/or memoranda) between Chancellor Gary May, Ari Kelman, and/or Karl Englebach; with Davis Faculty for Israel, Aggies for Israel, and/or Hillel.

**34 (UCDPRA 24365)**

PRA request sought records related to the U.S. House investigation, specifically, records “referring or relating to UC Davis’s or the University of California’s assessment of each congressional inquiry of any American university leader by the House of Representatives Committee of Education and the Workforce since October 7, 2023.” UCD responded by denying this as “not a records request” and as “unclear”.

Comment: Contrary to UCD’s comments, this is a clear records request. Our clients want UCD’s records referring or relating to the U.S. House of Representatives Committee on Education and the Workforce investigation(s) of antisemitism in higher education that began following Hamas’ October 7, 2023 attack. That includes, but is not limited, to all emails, letters, and/or memoranda concerning same. Naturally, it includes any correspondence between UCD and the Congressional committee directly, and any communication with any members of the committee such as Congresswoman Virginia Foxx, but it is broader than that. For example, it covers internal memoranda discussing any committee requests.

**35 (UCDPRA 24365)**

PRA request sought current employment status of Eddie Lampkin. UCD response: “No employee was found matching the name ‘Eddie Lampkin’.” Comment: **THIS REQUEST IS WITHDRAWN.**

**36 (UCDPRA 24365)**

PRA request: “All communications relating or referring to any of the above.” UCD responded by denying request as unduly burdensome. Comment: **THIS REQUEST IS WITHDRAWN.**

**37 (UCDPRA 24365)**

PRA request: “All documents relating to audits or assessments evaluating how any of the above content ‘promote[s] the role of art and culture as a viable community-building strategy’ between UC Davis and the greater Woodland community.’ [sic]” UCD responded: “Not a records request.”

Comment: Contrary to UCD’s comments, this is a clear records request. Our clients seek any assessments and/or audits done of the anti-Zionist materials identified in item 27 above and how it promoted UCD’s purpose in setting up/supporting TANA.

**41-42 (UCDPRA 24369)**

PRA request sought all records describing the meaning of each the symbols displayed on the encampment signs or in graffiti left on the Quad. UCD responded that these were informational and not records requests.

Comment: Contrary to UCD's response, these are records requests. Our clients seek UCD records discussing the meaning of symbols in encampment signs and/or graffiti. By way of example, this request would apply to any emails and/or memoranda by UCD staffers describing, asking about, or explaining Hamas-supporters' use of an inverted red triangle to signify support for the Hamas terror organization.<sup>3</sup>

**43 (UCDPRA 24369)**

PRA request sought all records identifying who or what "Al Qassam" is that was chanted by UAW on campus on or about June 11, 2024. UCD responded that these were informational and not records requests.

Comment: Contrary to UCD's response, this is a records request. A simple search for any UCD records (including but not limited to emails, letters, and/or memoranda referring to Al Qassam should produce the responsive records.

**44 (UCDPRA 24369)**

PRA request sought all records discussing whether UAW's protest on or about June 11, 2024 violated UC's restraining order against UAW. UCD responded: "Records do not exist, because there is no restraining order against the UAW at UC Davis."

Comment: This response appears to be disingenuous. There certainly was a restraining order against UAW, signed June 7, 2024, in the case of *Regents of the University of California v. UAW*, Case No. 30-2024-01403666-CU-MC-CXC, Superior Court of California, County of Orange. The order appears to have been effective throughout the University of California system, not limited to UC Davis. Our clients' request seeks UCD records discussing the relationship between the June 7 injunction and the June 11 protest. Again, we are particularly seeking emails, letters, and/or memoranda.

**45 (UCDPRA 24369)**

PRA request sought records referring/relating to George Habash, Leila Khaled. UCD response: "The University's ability to share personal information it maintains about individuals is governed by, among other laws, the California Information Practices Act ("IPA;" Calif. Civil Code § 1798 et seq.). In general, the IPA prohibits the University from disclosing

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<sup>3</sup> ADL Center on Extremism, "Inverted Red Triangle," Glossary of Extremism and Hate Home, <https://extremismterms.adl.org/glossary/inverted-red-triangle>.

“personal information” (broadly defined to include “any information that is maintained by an agency that identifies or describes an individual”), except in certain specified circumstances. The only IPA exception permits disclosure of such information if it is otherwise subject to disclosure under the California Public Records Act, which generally requires disclosure of public records. However, the PRA itself contains many exemptions to the general disclosure requirement, one of which is the privacy exemption § 7927.700 which provides that an agency is not required to disclose “Personnel, medical, or similar files, the disclosure of which would constitute an unwarranted invasion of personal privacy.” Therefore, under the PRA we would not conduct a search for the terms “George Habash” and/or “Leila Khaled.”

Comment: Habash and Khaled are not minors, UCD students, or US citizens, nor have our clients asked for medical information or other information that could be considered confidential; and Habash is no longer alive. Both Habash and Khaled are recognized terrorists.<sup>4</sup> Perhaps we misread UCD’s response, but **it appears that UCD denied our clients’ request for records about terrorists George Habash and Leila Khaled on the grounds that the request violated the terrorists’ privacy rights. Please clarify whether that was your intention.** If so, please identify on what applicable basis you are refusing to produce information about Habash and Khaled.

**46 (UCDPRA 24369)**

PRA request sought records re Party for Socialism and Liberation and/or Cops Off Campus. UCD responded, not a records request/request unclear.

Comment: Contrary to UCD’s comments, we believe that this is a clear records request. Nevertheless, for now, we are willing to revise the request to all records referring to Party for Socialism and Liberation and/or Cops Off Campus, including but not limited to emails, letters, and/or memoranda, for the time period October 7, 2023-present.

**47 (UCDPRA 24369)**

PRA request sought records re conferral of 2024 University Medal on Brooke Morey. UCD responded with a link to a UC Davis public relations feature story,<sup>5</sup> and denied the

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<sup>4</sup> US Department of State, Country Reports on Terrorism 2023, <https://www.state.gov/reports/country-reports-on-terrorism-2023/> (entry for the terrorist group Popular Front for the Liberation of Palestine identifies George Habash as its founder); National Counterterrorism Center, Counter Terrorism Guide, Popular Front for the Liberation of Palestine (PFLP), [https://www.dni.gov/nctc/ftos/pflp\\_fto.html](https://www.dni.gov/nctc/ftos/pflp_fto.html) (“George Habash [DECEASED] Founder and leader from 1967 to 2000; died in 2008 of natural causes”); ADL, “Leila Khaled: In Her Own Words” (October 2, 2020), <https://www.adl.org/resources/article/leila-khaled-her-own-words> (“Leila Khaled is a longtime active leader of the Popular Front for the Liberation of Palestine (PFLP) and is well-known for her role in the hijacking of two civilian airliners, TWA Flight 840 in 1969 (bound for Tel Aviv from Rome) and El Al flight 219 in 1970 (traveling from Amsterdam to New York City)”).

<sup>5</sup> Julia Ann Easley, “Fictional Adventure in Egypt To Become Reality for Top UC Davis Graduate,” UC Davis website (June 11, 2024), <https://www.ucdavis.edu/news/fictional-adventure-egypt-become-reality-top-uc-davis-graduate>.

request otherwise, claiming that “student records” are private education records under FERPA (20 USC § 1232g) and exempt under PRA (Gov’t Code § 7927.700).

Comment: This response is, again, disingenuous. Our clients did not seek personal records of Brooke Morey, but rather records about UCD’s conferral of an award upon her. Where are the university’s records of its decision to award the medal to Morey? What was the basis for the university’s decision? Our clients are entitled to have these records produced.

#### 48 (UCDPRA 24369)

PRA request sought records relating/referring to Hannah Zeltzer, Stanford McConnehey, Batool Alawadi, and/or Yara Kaadan. UCD responded that any response would violate the California Information Practices Act (CA Civil Code § 1798 *et seq.*) and be exempt under PRA § 7927.700.

Comment: Our clients do not seek any information protected from disclosure by the California Information Practices Act or exempt under the PRA. Nevertheless, it is difficult for us to credit that *every* UCD record referring or relating to these students is protected from disclosure, given that all four are anti-Zionist activists who have been in the news in relation to the campus disruptions since October 7, 2023. For example, McConnehey is or was the spokesman for the Popular University for the Liberation of Palestine (PULP) when it set up the encampment at UCD last spring.<sup>6</sup> Kaadan, Alawadi, and Zeltzer are all activists with Students for Justice in Palestine,<sup>7</sup> an organization which has disrupted<sup>8</sup> several campi to such an extent that they saw fit to suspend or terminate the organization.<sup>9</sup> Surely, their names came up in disclosable records, such

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<sup>6</sup> Ashley Sharp, “UC Davis facing federal lawsuit over pro-Palestinian encampment; student senate passes resolution in solidarity with protesters,” CBS News (May 21, 2024), <https://www.cbsnews.com/sacramento/news/uc-davis-facing-federal-lawsuit-over-pro-palestinian-encampment-student-senate-passes-resolution-in-solidarity-with-protesters/>.

<sup>7</sup> Canary Mission, “Yara Kaadan” entry, [https://canarymission.org/individual/Yara\\_Kaadan](https://canarymission.org/individual/Yara_Kaadan) (“Yara Kaadan was the president of a Students for Justice in Palestine (SJP) chapter that expressed support for Hamas after the October 7, 2023 attacks on Israel when Hamas terrorists murdered approximately 1,200 Israelis”); Canary Mission, “Batool Alawadi” entry, [https://canarymission.org/individual/Batool\\_Alawadi](https://canarymission.org/individual/Batool_Alawadi) (“Batool Alawadi served as a ‘secondary leader’ of the SJP chapter at the University of California, Davis (UC Davis) for the 2023-2024 academic year. At that time, she used the name Batool Mohammad.”); Canary Mission, “Hannah Zeltzer” entry, [https://canarymission.org/individual/Hannah\\_Zeltzer](https://canarymission.org/individual/Hannah_Zeltzer).

<sup>8</sup> Collin Anderson, “‘Death to Jews’: Inside the Home of 2 SJP Leaders at George Mason University, Police Find Guns, Ammo, and Terrorist Flags,” Washington Free Beacon (December 9, 2024), <https://freebeacon.com/campus/death-to-jews-inside-the-home-of-2-sjp-leaders-at-george-mason-university-police-find-guns-ammo-and-terrorist-flags/>.

<sup>9</sup> See, e.g., Michael Starr, “University of Michigan SJP suspended for up to two years,” Jerusalem Post (February 2, 2025), <https://www.jpost.com/diaspora/antisemitism/article-840359>; “Temple University suspends SJP following disruptive anti-Israel protests at career fair,” Campus Reform (October 17, 2024), <https://www.campusreform.org/article/temple-university-suspends-sjp-following-disruptive-anti-israel-protests-career-fair/26565>; Tara Suter, “GW suspends pro-Palestine group over anti-Israel messaging,” The Hill (November 14, 2023), <https://thehill.com/homenews/education/4310294-gw-suspends-pro-palestine-group/>; Jacob Gurvis, JTA, “Brandeis bans Students for Justice in Palestine, saying it ‘openly supports Hamas,’” Times of Israel (November 7, 2023), <https://www.timesofisrael.com/brandeis-bans-students-for-justice-in-palestine-saying-it-openly-supports->

as memoranda about the encampment, divestment vote,<sup>10</sup> and general harassment of Jews on campus?

**49 (UCDPRA 24369)**

PRA request sought records relating/referring to Lysandra Dasilva, Nathan Orr, and/or Cheyenne Xiong. UCD responded that any response would violate the California Information Practices Act (CA Civil Code § 1798 et seq.) and be exempt under PRA § 7927.700.

Comment: Our clients do not seek any information protected from disclosure by the California Information Practices Act or exempt under the PRA. Nor has UCD alleged any facts that would support its supposed exemption claims. Our clients simply seek university records about three individuals **arrested for vandalizing the UCD campus.**<sup>11</sup> We await responsive records.

**50 (UCDPRA 24369)**

PRA request sought records relating or referring to “National SJP 2024 Summer School.” UCD responded that this was not a records request/request unclear.

Comment: Contrary to UCD’s comments, we believe that this is a clear records request. Nevertheless, for now, we are willing to revise the request to all records referring to National SJP 2024 Summer School (or some permutation thereof, such as National Students for Justice in Palestine 2024 Summer School), including but not limited to emails, letters, and/or memoranda.

**51 (UCDPRA 24369)**

PRA request: “All records of communications, relating to any of the above items, directed to, by, or copying any of the following: Chancellor Gary May, Mike Sweeny, Ari Kelman, Joe Farrow, any other representative of the Chancellor's Office, UCOP, the Office of Student Affairs, HDAAP, or UC Davis PD.” UCD response denied as unduly burdensome. Comment: **THIS REQUEST IS WITHDRAWN.**

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[hamas/](#); Rachel Frommer, “UC-Irvine Places Students for Justice in Palestine on Two-Year Probation for Protest,” Washington Free Beacon (September 1, 2017), <https://freebeacon.com/culture/uc-irvine-places-students-justice-palestine-two-year-probation-protest/>.

<sup>10</sup> Rivers Stout, “ASUCD passes bill in favor of divestment from corporations ‘complicit in violations of Palestinian rights,’” California Aggie (February 22, 2024), <https://theaggie.org/2024/02/22/asucd-passes-bill-in-favor-of-divestment-from-corporations-complicit-in-violations-of-palestinian-rights/> (includes comments by Kaadan).

<sup>11</sup> Yolo County District Attorney’s Office Press Release, “Felony Charges Filed After Vandalism Incident on UC Davis Campus” (May 29, 2024), <https://yoloda.org/felony-charges-filed-after-vandalism-incident-on-uc-davis-campus/> (“On May 24, 2024, Lysandra Dasilva, 31, of Davis, Nathan Orr, 30, of Davis, and Cheyenne Xiong, 20, of Hayfork, were arrested on suspicion of vandalism, after an act of vandalism occurred on UC Davis campus... Dasilva and Xiong were also charged with a one count of Resisting or Obstructing Public Officer, Peace Officer or Emergency Medical Technician.”).

**52 (UCDPRA 24402)**

PRA request: “Is Eddie Lampkin still employed by UC Davis?” UCD response: “As responded to within UCDPRA24365 on July 25th , 2024, no employee was found matching the name ‘Eddie Lampkin’. Are you able to provide any other information to assist in our search?” Comment: Like request #35, **THIS REQUEST IS WITHDRAWN**.

**61 (UCDPRA 24539)**

PRA request sought records re “Party for Socialism and Liberation and/or Cops Off Campus between September 1, 2023 and October 10, 2024”. UCD responded that the request was “overly broad” and “we are not able to conduct university-wide searches.” Comment: See request no. 46 above.

Kindly respond to this letter and produce all responsive records by \_\_\_, 2025. Please note that if we do not receive a response and all requested records by that date, our clients are prepared to file suit. In that case, our clients shall certainly request that UC Davis pay their attorney fees and costs, as provided for in the PRA statute. Pursuant to Government Code § 7923.115(a), “If the requester prevails in litigation filed pursuant to this chapter, the court shall award court costs and reasonable attorney’s fees to the requester.”

Very truly yours,

/s/ Johanna E. Markind

Lori Lowenthal Marcus  
Jerome M. Marcus  
Johanna E. Markind

cc. Clients

Attachments

# **Exhibit Cover Page**

**EXHIBIT NUMBER C**

March 11, 2025

By email to [publicrecords@ucdavis.edu](mailto:publicrecords@ucdavis.edu)

Public Records Office  
UC Davis

**Re:   October 7 Coalition and Stop Davis Antisemitism  
      PRA Requests to University of California—Davis**

Dear Sir or Madam:

Kindly respond to our February 11, 2025 letter within the next two weeks.

Very truly yours,

/s/ Johanna E. Markind

Lori Lowenthal Marcus  
Jerome M. Marcus  
Johanna E. Markind

cc.     Clients

# **Exhibit Cover Page**

**EXHIBIT NUMBER D**

**From:** Public Record publicrecords@ucdavis.edu   
**Subject:** RE: PRA Requests by October 7 Coalition and Stop Davis Antisemitism  
**Date:** April 10, 2025 at 6:31 PM  
**To:** Johanna Markind JohannaMarkind@deborahproject.org, Public Record publicrecords@ucdavis.edu  
**Cc:** Lori Lowenthal Marcus lorilowenthalmarcus@deborahproject.org, Jerome Marcus jmarcus@deborahproject.org

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PR

Dear Johanna Markind,

The email is to confirm receipt of your letter. As you have referenced in your letter, we have received a voluminous number of requests, many of which are still being worked on, and many that have been closed with either a production of records, a determination that no records exist, a denial based on an existing exemption under the PRA, or some combination of the three.

We will need an extended amount of time to thoroughly review your letter and spreadsheet and respond accordingly. We appreciate the narrowed information pertaining to some requests and will apply to those still open.

Thank you for your patience as we work to respond to all public records requests our office receives on behalf of the University of California, Davis campus and Health campus.

Thank you,

**Heather Urzua**

Legal Operations Manager

UC Legal – UC Davis Office of the Campus Counsel

One Shields Avenue, Davis, CA 95616

Phone: 530-754-6295

<https://campuscounsel.ucdavis.edu/>

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**From:** Johanna Markind <JohannaMarkind@deborahproject.org>  
**Sent:** Tuesday, March 11, 2025 12:21 PM  
**To:** Public Record <publicrecords@ucdavis.edu>  
**Cc:** Lori Lowenthal Marcus <lorilowenthalmarcus@deborahproject.org>; Jerome Marcus <jmarcus@deborahproject.org>  
**Subject:** PRA Requests by October 7 Coalition and Stop Davis Antisemitism

Dear Sir/Madam,

Please see the attached correspondence.

**Johanna E. Markind, Esquire**

The Deborah Project

P.O. Box 212 Merion Station, PA 19066

(610) 880-0100 ext. 404

[JohannaMarkind@deborahproject.org](mailto:JohannaMarkind@deborahproject.org)

[www.DeborahProject.org](http://www.DeborahProject.org)

**UC Davis 02-11-25  
.pdf**



**Attach1\_Chart of  
PRAs to UC Davis.pdf**  
61 KB



**UC Davis 03-11-25  
.pdf**  
131 KB



**VERIFICATION**

I am one of the founders and managers of the Sixth Night Coalition.

I have read the foregoing Complaint and know its contents. The same is true of my own knowledge, except as to those matters which are therein stated upon information or belief, and as to those matters, I believe it to be true.

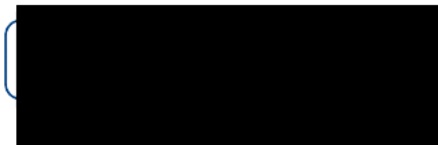
I declare under penalty of perjury that the foregoing is true and correct.

Executed on the date stated below at Yolo County, California.

DATED: 7/10/2025

A black rectangular redaction box covering a signature.

DATED: 7/10/2025

A black rectangular redaction box covering a signature.

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):

Mark L. Javitch, CA SBN 323729, Javitch Law Office, 480 S. Ellsworth Ave, San Mateo, CA 94401

TELEPHONE NO.: (650) 781-8000

FAX NO. (Optional): 650-300-0343

ATTORNEY FOR (Name): Sixth Night Coalition

FOR COURT USE ONLY

## SUPERIOR COURT OF CALIFORNIA, COUNTY OF YOLO

STREET ADDRESS: 1000 Main St.

MAILING ADDRESS:

CITY AND ZIP CODE: Woodland, CA 95695

BRANCH NAME:

CASE NAME:

SIXTH NIGHT COALITION v. REGENTS OF THE UNIVERSITY OF CALIFORNIA

## CIVIL CASE COVER SHEET

☒ **Unlimited** (Amount demanded exceeds \$25,000) ☐ **Limited** (Amount demanded is \$25,000)

## Complex Case Designation

☐ Counter ☐ Joinder  
Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)

CASE NUMBER:

JUDGE:

DEPT.:

Items 1–6 below must be completed (see instructions on page 2).

1. Check **one** box below for the case type that best describes this case:

## Auto Tort

☐ Auto (22)  
☐ Uninsured motorist (46)

## Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort

☐ Asbestos (04)  
☐ Product liability (24)  
☐ Medical malpractice (45)

☐ Other PI/PD/WD (23)

## Non-PI/PD/WD (Other) Tort

☐ Business tort/unfair business practice (07)  
☐ Civil rights (08)  
☐ Defamation (13)  
☐ Fraud (16)  
☐ Intellectual property (19)  
☐ Professional negligence (25)  
☐ Other non-PI/PD/WD tort (35)

## Employment

☐ Wrongful termination (36)  
☐ Other employment (15)

## Contract

☐ Breach of contract/warranty (06)  
☐ Rule 3.740 collections (09)  
☐ Other collections (09)  
☐ Insurance coverage (18)  
☐ Other contract (37)

## Real Property

☐ Eminent domain/Inverse condemnation (14)  
☐ Wrongful eviction (33)  
☐ Other real property (26)

## Unlawful Detainer

☐ Commercial (31)  
☐ Residential (32)  
☐ Drugs (38)

## Judicial Review

☐ Asset forfeiture (05)  
☐ Petition re: arbitration award (11)  
☒ Writ of mandate (02)  
☐ Other judicial review (39)

## Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400–3.403)

☐ Antitrust/Trade regulation (03)  
☐ Construction defect (10)  
☐ Mass tort (40)  
☐ Securities litigation (28)  
☐ Environmental/Toxic tort (30)  
☐ Insurance coverage claims arising from the above listed provisionally complex case types (41)

## Enforcement of Judgment

☐ Enforcement of judgment (20)

## Miscellaneous Civil Complaint

☐ RICO (27)  
☐ Other complaint (not specified above) (42)

## Miscellaneous Civil Petition

☐ Partnership and corporate governance (21)  
☐ Other petition (not specified above) (43)

2. This case ☐ is ☒ is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:

- a. ☐ Large number of separately represented parties d. ☐ Large number of witnesses  
b. ☐ Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve e. ☐ Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court  
c. ☐ Substantial amount of documentary evidence f. ☐ Substantial postjudgment judicial supervision

3. Remedies sought (check all that apply): a. ☒ monetary b. ☒ nonmonetary; declaratory or injunctive relief c. ☐ punitive

4. Number of causes of action (specify): 2 - California Public Records Act Writ of Mandate and Declaratory/Injunctive Relief

5. This case ☐ is ☒ is not a class action suit.

6. If there are any known related cases, file and serve a notice of related case. (You may use form CM-015.)

Date: July 11, 2025

Mark L. Javitch

(TYPE OR PRINT NAME)

(SIGNATURE OF PARTY OR ATTORNEY FOR PARTY)

## NOTICE

- Plaintiff must file this cover sheet with the first paper filed in the action or proceeding (except small claims cases or cases filed under the Probate Code, Family Code, or Welfare and Institutions Code). (Cal. Rules of Court, rule 3.220.) Failure to file may result in sanctions.
- File this cover sheet in addition to any cover sheet required by local court rule.
- If this case is complex under rule 3.400 et seq. of the California Rules of Court, you must serve a copy of this cover sheet on all other parties to the action or proceeding.
- Unless this is a collections case under rule 3.740 or a complex case, this cover sheet will be used for statistical purposes only.

Page 1 of 2

**To Plaintiffs and Others Filing First Papers.** If you are filing a first paper (for example, a complaint) in a civil case, you **must** complete and file, along with your first paper, the Civil Case Cover Sheet contained on page 1. This information will be used to compile statistics about the types and numbers of cases filed. You must complete items 1 through 6 on the sheet. In item 1, you must check **one** box for the case type that best describes the case. If the case fits both a general and a more specific type of case listed in item 1, check the more specific one. If the case has multiple causes of action, check the box that best indicates the **primary** cause of action. To assist you in completing the sheet, examples of the cases that belong under each case type in item 1 are provided below. A cover sheet must be filed only with your initial paper. Failure to file a cover sheet with the first paper filed in a civil case may subject a party, its counsel, or both to sanctions under rules 2.30 and 3.220 of the California Rules of Court.

**To Parties in Rule 3.740 Collections Cases.** A "collections case" under rule 3.740 is defined as an action for recovery of money owed in a sum stated to be certain that is not more than \$25,000, exclusive of interest and attorney's fees, arising from a transaction in which property, services, or money was acquired on credit. A collections case does not include an action seeking the following: (1) tort damages, (2) punitive damages, (3) recovery of real property, (4) recovery of personal property, or (5) a prejudgment writ of attachment. The identification of a case as a rule 3.740 collections case on this form means that it will be exempt from the general time-for-service requirements and case management rules, unless a defendant files a responsive pleading. A rule 3.740 collections case will be subject to the requirements for service and obtaining a judgment in rule 3.740.

**To Parties in Complex Cases.** In complex cases only, parties must also use the Civil Case Cover Sheet to designate whether the case is complex. If a plaintiff believes the case is complex under rule 3.400 of the California Rules of Court, this must be indicated by completing the appropriate boxes in items 1 and 2. If a plaintiff designates a case as complex, the cover sheet must be served with the complaint on all parties to the action. A defendant may file and serve no later than the time of its first appearance a joinder in the plaintiff's designation, a counter-designation that the case is not complex, or, if the plaintiff has made no designation, a designation that the case is complex.

### CASE TYPES AND EXAMPLES

#### Auto Tort

Auto (22)—Personal Injury/Property Damage/Wrongful Death  
Uninsured Motorist (46) *(if the case involves an uninsured motorist claim subject to arbitration, check this item instead of Auto)*

#### Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort

Asbestos (04)  
Asbestos Property Damage  
Asbestos Personal Injury/Wrongful Death  
Product Liability *(not asbestos or toxic/environmental)* (24)  
Medical Malpractice (45)  
Medical Malpractice—Physicians & Surgeons  
Other Professional Health Care Malpractice  
Other PI/PD/WD (23)  
Premises Liability (e.g., slip and fall)  
Intentional Bodily Injury/PD/WD (e.g., assault, vandalism)  
Intentional Infliction of Emotional Distress  
Negligent Infliction of Emotional Distress  
Other PI/PD/WD

#### Non-PI/PD/WD (Other) Tort

Business Tort/Unfair Business Practice (07)  
Civil Rights (e.g., discrimination, false arrest) *(not civil harassment)* (08)  
Defamation (e.g., slander, libel) (13)  
Fraud (16)  
Intellectual Property (19)  
Professional Negligence (25)  
Legal Malpractice  
Other Professional Malpractice *(not medical or legal)*  
Other Non-PI/PD/WD Tort (35)

#### Employment

Wrongful Termination (36)  
Other Employment (15)

#### Contract

Breach of Contract/Warranty (06)  
Breach of Rental/Lease  
Contract *(not unlawful detainer or wrongful eviction)*  
Contract/Warranty Breach—Seller Plaintiff *(not fraud or negligence)*  
Negligent Breach of Contract/Warranty  
Other Breach of Contract/Warranty  
Collections (e.g., money owed, open book accounts) (09)  
Collection Case—Seller Plaintiff  
Other Promissory Note/Collections Case  
Insurance Coverage *(not provisionally complex)* (18)  
Auto Subrogation  
Other Coverage  
Other Contract (37)  
Contractual Fraud  
Other Contract Dispute

#### Real Property

Eminent Domain/Inverse Condemnation (14)  
Wrongful Eviction (33)  
Other Real Property (e.g., quiet title) (26)  
Writ of Possession of Real Property  
Mortgage Foreclosure  
Quiet Title  
Other Real Property *(not eminent domain, landlord/tenant, or foreclosure)*

#### Unlawful Detainer

Commercial (31)  
Residential (32)  
Drugs (38) *(if the case involves illegal drugs, check this item; otherwise, report as Commercial or Residential)*

#### Judicial Review

Asset Forfeiture (05)  
Petition Re: Arbitration Award (11)  
Writ of Mandate (02)  
Writ—Administrative Mandamus  
Writ—Mandamus on Limited Court Case Matter  
Writ—Other Limited Court Case Review  
Other Judicial Review (39)  
Review of Health Officer Order  
Notice of Appeal—Labor Commissioner Appeals

#### Provisionally Complex Civil Litigation (Cal. Rules of Court Rules 3.400–3.403)

Antitrust/Trade Regulation (03)  
Construction Defect (10)  
Claims Involving Mass Tort (40)  
Securities Litigation (28)  
Environmental/Toxic Tort (30)  
Insurance Coverage Claims *(arising from provisionally complex case type listed above)* (41)

#### Enforcement of Judgment

Enforcement of Judgment (20)  
Abstract of Judgment (Out of County)  
Confession of Judgment *(non-domestic relations)*  
Sister State Judgment  
Administrative Agency Award *(not unpaid taxes)*  
Petition/Certification of Entry of Judgment on Unpaid Taxes  
Other Enforcement of Judgment Case

#### Miscellaneous Civil Complaint

RICO (27)  
Other Complaint *(not specified above)* (42)  
Declaratory Relief Only  
Injunctive Relief Only *(non-harassment)*  
Mechanics Lien  
Other Commercial Complaint Case *(non-tort/non-complex)*  
Other Civil Complaint *(non-tort/non-complex)*

#### Miscellaneous Civil Petition

Partnership and Corporate Governance (21)  
Other Petition *(not specified above)* (43)  
Civil Harassment  
Workplace Violence  
Elder/Dependent Adult Abuse  
Election Contest  
Petition for Name Change  
Petition for Relief From Late Claim  
Other Civil Petition

|                                                                                                                                                                                                         |                      |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|
| <b>SUPERIOR COURT OF CALIFORNIA</b><br><b>COUNTY OF YOLO</b><br>1000 MAIN STREET<br>WOODLAND, CA. 95695<br>530-406-6704                                                                                 | <i>For Court Use</i> |
| Sixth Night Coalition<br><div style="text-align: right;">Plaintiff,</div><br><div style="text-align: center;">vs.</div> Regents of the University of<br><div style="text-align: right;">Defendant</div> |                      |
| <b>NOTICE OF CASE MANAGEMENT CONFERENCE</b>                                                                                                                                                             |                      |

**NOTICE TO ALL APPEARING PARTIES AND THEIR ATTORNEYS:**

Notice is hereby given that the above-entitled action has been set for a Case Management Conference on \_\_\_\_\_ at \_\_\_\_\_ in Department \_\_\_\_\_.

The plaintiff shall serve the Notice of Case Management Conference on each defendant with the complaint.

You must file a Case Management Statement 15 days prior to the above date.

Date:

SHAWN C. LANDRY, COURT EXECUTIVE OFFICER

\_\_\_\_\_, Deputy Clerk

YOCV0142

8/6/2020; Rev. 8/2022