

# SIRI & GLIMSTAD LLP

200 PARK AVENUE  
SEVENTEENTH FLOOR  
NEW YORK, NY 10166  
P: (212) 532-1091  
F: (646) 417-5967  
WWW.SIRILLP.COM

## CALIFORNIA PUBLIC RECORDS ACT REQUEST

VIA FEDEX

January 3, 2020

UC Hastings  
Attn: FOIA Agent  
200 McAllister Street  
San Francisco, CA 94102

VIA FEDEX & FAX

Office of the General Counsel  
University of California  
Office of the President  
1111 Franklin Street, 8th Floor  
Oakland, CA 94607  
Fax: (510) 987-9757

Re: Dorit Reiss Email Communication January 2017 to Present (IR#0216)

Dear Sir or Madam:

This firm represents the Informed Consent Action Network ("ICAN"). On behalf of ICAN, we are requesting records pursuant to the California Public Records Act § 6250 et seq.

By this letter, please provide the following records in your possession via email to [foia@sirillp.com](mailto:foia@sirillp.com):

1. Each and every email communication between January 1, 2017, and the present which includes Dorit Reiss or her email address on the "To", "From", "Cc" or "Bcc" line and also includes Stanley Plotkin or his email address on the "To", "From", "Cc" or "Bcc" line.
2. Each and every email communication between January 1, 2017, and the present which includes Dorit Reiss or his email address on the "To", "From", "Cc" or "Bcc" line and also includes Paul Offit or his email address on the "To", "From", "Cc" or "Bcc" line.

3. Each and every email communication between January 1, 2017, and the present which includes Dorit Reiss or her email address on the "To", "From", "Cc" or "Bcc" line and also includes Vacsafety or Vacsafety@listserv.immunize.org on the "To", "From", "Cc" or "Bcc" line.
4. Each and every email communication between January 1, 2017, and the present which includes Dorit Reiss or her email address on the "To", "From", "Cc" or "Bcc" line and also includes the terms: "Orac", "Siri", "Del", "ICAN", "Dzau", "Michigan", "Package Insert", and/or "VIS."

As a courtesy, note that email addresses for Stanley Plotkin include but are not limited to [stanley.plotkin@sanofipasteur.com](mailto:stanley.plotkin@sanofipasteur.com); [stanley.plotkin@vaxconsult.com](mailto:stanley.plotkin@vaxconsult.com); [admin@vaxconsult.com](mailto:admin@vaxconsult.com); [CID.editorialoffice@oup.com](mailto:CID.editorialoffice@oup.com); and [Stanley.plotkin@sanofi.com](mailto:Stanley.plotkin@sanofi.com) and emails for Paul Offit include but are not limited to [offit@email.chop.edu](mailto:offit@email.chop.edu).

We ask that you waive any and all fees or charges. ICAN is a not-for-profit 501(c)(3) organization and its mission is to raise public awareness about vaccine safety and to provide the public with information to give informed consent. As part of its mission, ICAN actively investigates and disseminates information regarding vaccine safety issues, including through their website, and press events and releases. ICAN is seeking the information in this FOIA request to allow it to contribute to the public understanding of the government's vaccine safety programs, including the government's efforts to promote vaccine safety. The information requested in this FOIA request will not contribute to any commercial activities.

We request all non-exempt portions which are reasonably segregable. We further request that you describe any deleted or withheld material in detail and specify the statutory basis for the denial as well as your reasons for believing that the alleged statutory justification applies. Such statements may help to avoid unnecessary appeal and litigation. ICAN of course reserves all rights to appeal the withholding or deletion of any information.

Access to the requested records should be granted within ten (10) business days from the date of your receipt of this letter. Failure to respond in a timely manner shall be viewed as a denial of this request. If you would like to discuss our requests or any issues raised in this letter, please feel free to contact me at (212) 532-1091 or via email at [foia@sirillp.com](mailto:foia@sirillp.com) during normal business hours. Thank you for your time and attention to this matter.

Very truly yours,



Allison Lucas, Esq.  
*Licensed in MI*