

Shannon Armstrong | Lawyer ShannonArmstrong@MarkowitzHerbold.com

March 30, 2015

Via Email Only

Publicrecords@ucdavis.edu

Re: Public Records Request

I am writing to request specific documents related to public records requests submitted to the University of California-Davis ("University") from U.S. Right to Know ("USRTK"), pursuant to the California Public Records Act.

I request the following documents:

- 1. All correspondence with U.S. Right to Know ("USRTK") relating to any public records or requests from USRTK, including but not limited to copies of any such records requests and any responses to such records requests.
- 2. All documents produced in response to any public records request from USRTK, except for communications with staff or employees of the following entities or organizations:
 - a. Monsanto;
 - b. Syngenta;
 - c. Bayer or Bayer CropScience;
 - d. BASF;
 - e. DuPont or Pioneer;
 - f. Dow or Dow AgroSciences;
 - g. GMO Answers;
 - h. Biotechnology Industry Organization; and
 - i. Council for Biotechnology Information.

These requests are ongoing, and to the extent the University has not yet produced any or all documents in response to a public records request made by

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USRTK, I request that those documents that are responsive to this request be provided to me when they are produced to USRTK.

This request includes copies of every document related to the matter, regardless of the format in which the information is stored. This request specifically includes information stored electronically and in hard copy.

If you refuse to provide this information, the California Public Records Act requires you notify me and indicate the reason for withholding the records. If the exemption you are claiming only applies to a portion of the records, please redact that portion and provide the remainder of the records, as required by Government Code § 6253(a).

I request that all documents be produced in electronic format. If necessary, however, I agree to pay 20 cents per page for copying expenses, with the caveat that I request prior notice and an opportunity to object, or to reformulate my request, in the event that the actual cost is anticipated to exceed \$5000.

I request these records be provided as soon as possible. If you have any questions or need more information in order to expedite this request, please call me at 503-295-3085, or email me at shannonarmstrong@mhgm.com

Sincerely,

Shannon Armstrong

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