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*Attorneys for Plaintiff/Petitioner*  
GARY RUSKIN

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

GARY RUSKIN,

Plaintiff/Petitioner,

v.

THE REGENTS OF THE UNIVERSITY OF  
CALIFORNIA,

Defendant/Respondent.

CASE NO: PT16-1304

**REQUEST FOR PRODUCTION OF  
DOCUMENTS, SET ONE**

ACTION FILED: August 17, 2016

**PROPOUNDING PARTY:** Plaintiff/Petitioner GARY RUSKIN

**RESPONDING PARTY:** Defendant/Respondent THE REGENTS OF THE UNIVERSITY OF  
CALIFORNIA

**SET NO:** ONE

**TO DEFENDANT/RESPONDENT REGENTS OF THE UNIVERSITY OF CALIFORNIA  
AND THEIR ATTORNEYS OF RECORD:**

Pursuant to and in the manner prescribed by Code of Civil Procedure section 2031, you are  
hereby requested to serve upon counsel for Plaintiff/Petitioner Gary Ruskin within 30 days of the date of  
service, your written responses to the following requests, and to produce the documents described below  
for inspection and copying by Olson, Hagel & Fishburn, LLP, at the offices of Olson, Hagel & Fishburn,

1 LLP, 555 Capitol Mall, Suite 1425, Sacramento, California 95814.

2 **DEFINITIONS AND INSTRUCTIONS**

3 A. In responding to this request, Defendants/Respondents the Regents of the University of  
4 California (herein "the Regents", "you" or "your") are asked to produce all documents which are in their  
5 possession, custody or control or available to them, including documents in the possession or control of  
6 their attorneys, investigators, employees, agents, or other representatives, or any other person or persons  
7 acting on their behalf.

8 B. If you claim that any document which the propounding party has requested be produced  
9 is privileged or subject to a claim of work-product immunity and not subject to inspection, please:

10 1) Identify each document, including the author, recipient, subject matter and  
11 general characterization of the content;

12 2) State the date of such document;

13 3) Set forth the date and manner in which such document was obtained; and

14 4) Set forth the legal basis for the claim of privilege or work-product immunity.

15 C. When this discovery calls for a document which, while known to the Regents, is not in  
16 the possession, custody or control of the Regents, the Regents should identify its present location or  
17 custodian, if known, or otherwise its last known location and custodian.

18 D. Each request is intended to, and does request that, each and every, all and singular, and  
19 the particulars and parts thereof be responded to with the same force and effect as if each part in  
20 particular were the subject of and were asked by separate request.

21 E. For the purposes of these requests, the following terms shall have the following meaning  
22 set forth below:

23 1) "Documents" as used herein means, without limitation, any "writings" as broadly defined  
24 in California Evidence Code section 250 to include any handwriting, typewriting, printing (computer  
25 printer or other), photographing, tape recording (both visual and audio), photocopying, and every other  
26 means of recording upon any tangible things. Also included in the definition are written, typewritten,  
27 drawn or printed materials, whatsoever, and all information kept or recorded on magnetic or electronic  
28 media, however the same are produced or reproduced and wherever the same are located; including, but

not limited to, correspondence, letters, agreements, contracts, memoranda of agreement, telegrams, interoffice communications, deeds, deeds of trust, leases, assignments, licenses, memoranda, reports, records, books of account, financial statements, balance sheets, income statements, proformas, projections, forecasts, scrap books, diaries, logs, articles of incorporation, bylaws, minutes, minute books, plans, drawings, sketches, blueprints, photographs, photocopies, charts, maps, graphs, curves, diagrams, descriptions, invoices, bills of lading, manifests, receipts, consignment tickets, requisitions, motion pictures, video tapes, statements, bills, checks, check stubs, vouchers, recordings, transcripts, studies, analyses, surveys, publications, writings, printed matter, papers, computation sheets, data sheets; computer printouts, computer programs, catalogs, brochures, reprints, tables, records or oral communications, tape and microfilm recordings, rules and regulations, whether in proposed or final form, and all other written, recorded, photographic, photocopy or computer-related materials, and includes, without limitations, originals, copies (whether typewritten, handwritten, photostatic, photographic or electronic), no matter how or by whom prepared, and all drafts prepared in connection with such writings or documents, whether used or not.

2) Where the context herein makes it appropriate, each singular word shall include its plural and each plural word shall include its singular. "Any" as well as "or" shall be construed either disjunctively or conjunctively as necessary to be within the scope of the discovery. Each of the following words includes the meaning of every other word: "each," "every," "all," and "any." The present tense shall be construed to include the past tense and the past tense shall be construed to include the present tense. The masculine shall be construed in the generic sense.

3) A request for documents that "refer or relate to" is a request for all information which deals with, discusses, mentions, regards, concerns, analyzes, relates, or refers in any way whatsoever, either directly or indirectly, to that subject.

4) "Plaintiff" shall refer to Gary Ruskin, and any of his agents, representatives, employees, attorneys, accountants or any other person acting on his behalf.

5) "Defendant" shall refer to the Regents of the University of California and any of their agents, representatives, employees, attorneys, accountants or any other person acting on their behalf.

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1           6) "Public Records Act" shall refer to the California Public Records Act, codified in  
2 Government Code section 6250, et seq.

3                               **REQUEST FOR PRODUCTION OF DOCUMENTS**

4 **REQUEST FOR PRODUCTION OF DOCUMENTS NO. 1:**

5           Please produce all documents requested in Plaintiff's Public Records Act request dated January  
6 28, 2015 seeking documents regarding Professor Pamela Ronald.

7 **REQUEST FOR PRODUCTION OF DOCUMENTS NO. 2:**

8           Please produce all documents requested in Plaintiff's Public Records Act request dated January  
9 28, 2015 seeking documents regarding Professor Neal Van Alfen.

10 **REQUEST FOR PRODUCTION OF DOCUMENTS NO. 3:**

11           Please produce all documents requested in Plaintiff's Public Records Act request dated January  
12 28, 2015 seeking documents regarding Professor Daniel Sumner.

13 **REQUEST FOR PRODUCTION OF DOCUMENTS NO. 4:**

14           Please produce all documents requested in Plaintiff's Public Records Act request dated January  
15 28, 2015 seeking documents regarding Professor Colin Carter.

16 **REQUEST FOR PRODUCTION OF DOCUMENTS NO. 5:**

17           Please produce all documents requested in Plaintiff's Public Records Act request dated January  
18 28, 2015 seeking documents regarding Professor Julian Alston.

19 **REQUEST FOR PRODUCTION OF DOCUMENTS NO. 6:**

20           Please produce all documents requested in Plaintiff's Public Records Act request dated February  
21 3, 2015 seeking documents regarding Professor Kent Bradford.

22 **REQUEST FOR PRODUCTION OF DOCUMENTS NO. 7:**

23           Please produce all documents requested in Plaintiff's Public Record Act request dated March 26,  
24 2015 seeking documents regarding Jon Entine.

25 **REQUEST FOR PRODUCTION OF DOCUMENTS NO. 8:**

26           Please produce all documents requested in Plaintiff's April 15, 2015 Public Records Act request  
27 seeking documents regarding Robin Bisson.

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1 **REQUEST FOR PRODUCTION OF DOCUMENTS NO. 9:**

2 Please produce all documents requested in Plaintiff's July 9, 2015 Public Records Act request  
3 seeking documents regarding Roger Beachy.

4 **REQUEST FOR PRODUCTION OF DOCUMENTS NO. 10:**

5 Please produce all documents requested in Plaintiff's August 3, 2015 Public Records Act request  
6 seeking documents regarding UC Davis faculty and staff and specified organizations and persons.

7 **REQUEST FOR PRODUCTION OF DOCUMENTS NO. 11:**

8 Please produce all documents requested in Plaintiff's November 2, 2015 Public Records Act  
9 request seeking documents regarding communications between Dr. Denneal Jamison-McClung and  
10 persons affiliated with several entities identified in the request, and documents regarding  
11 communications between Jon Entine and Shannon Albers.

12 **REQUEST FOR PRODUCTION OF DOCUMENTS NO. 12:**

13 Please produce all documents requested in Plaintiff's February 5, 2016 Public Records Act  
14 request seeking documents regarding funding for the World Food Center at the University of California,  
15 Davis.

16 **REQUEST FOR PRODUCTION OF DOCUMENTS NO. 13:**

17 Please produce all documents that describe the actions Defendant took in searching for,  
18 evaluating, and producing documents requested in the Public Records Act requests submitted by  
19 Plaintiff.

20  
21 Dated: October 17, 2017

22 Respectfully submitted,

23 OLSON HAGEL & FISHBURN LLP

24  
25  
26 By: 

RICHARD C. MIADICH

*Attorneys for Plaintiff/Petitioner*

GARY RUSKIN

PROOF OF SERVICE

Case Name: *Ruskin v. The Regents of the University of California*  
Case No: *PT16-1304*  
Court: *Superior Court, County of Yolo*

I, NONA MOUNIR, am a citizen of the United States, over the age of 18, and not a party to the within action. My business address is 555 Capitol Mall, Suite 1425, Sacramento, California, 95814. On October 17, 2017, I served a true and correct copy of the following entitled documents:

REQUEST FOR PRODUCTION OF DOCUMENTS, SET ONE

on the parties in said action as follows:

BY OVERNIGHT DELIVERY: By placing said envelope for collection by authorized courier, with delivery fees provided for, in Sacramento, California, addressed to said parties.

BY ELECTRONIC SERVICE: By transmitting a true copy thereof to said parties at the internet service address (es) indicated below based on a court order or an agreement of the parties to accept service by email. No electronic message or other indication that the transmission was unsuccessful was received within a reasonable time after the transmission.

X BY MAIL: By placing the envelope(s) for collection and mailing on the date and at the place shown in items below, following our ordinary business practices. I am readily familiar with this business' practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service in a sealed envelope with postage fully prepaid.

BY PERSONAL SERVICE: By causing said envelope to be hand delivered to said parties at the addresses listed below.

Counsel for THE REGENTS OF THE UNIVERSITY OF CALIFORNIA

Charles F. Robinson  
[charles.robinson@ucop.edu](mailto:charles.robinson@ucop.edu)

Karen Jensen Petrulakis  
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University of California  
Office of the General Counsel  
1111 Franklin Street, 8<sup>th</sup> Floor  
Oakland, CA 94607-5200

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1 I declare under penalty of perjury under the laws of the State of California that the foregoing is  
2 true and correct and that this declaration was executed on October 17, 2017, in Sacramento, California.

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