

STATE OF NORTH CAROLINA
ORANGE COUNTY

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
22 CVS 463

US RIGHT TO KNOW,
Plaintiff,

v.

THE UNIVERSITY OF NORTH
CAROLINA AT CHAPEL HILL,
Defendant.

**PLAINTIFF'S FIRST
INTERROGATORIES TO BE
ANSWERED BY DEFENDANT THE
UNIVERSITY OF NORTH CAROLINA
AT CHAPEL HILL**

Plaintiff US Right to Know, by and through counsel and pursuant to Rules 26 and 33 of the North Carolina Rules of Civil Procedure, herewith serves upon The University of North Carolina at Chapel Hill (defendant is hereinafter referred to as "Responding Party"), the following written interrogatories. Responding Party is required to answer these interrogatories separately and fully in writing under oath and to serve a copy of the answers to the undersigned within thirty (30) days of receipt.

These interrogatories shall be continuing in nature until the date of trial or hearing and the defendant is required to serve supplemental answers as additional information may become available, as required by Rule 26 of the Rules of Civil Procedure.

INTERROGATORY NO. 1:

For each public record request made by plaintiff prior to the date of these interrogatory requests, state the total number of records and the total number of pages you are withholding as privileged or which you consider not to be public records.

ANSWER:

INTERROGATORY NO. 2:

State each statutory exemption, each statutory privilege, and each statutory declaration that a record is not a public record that you are asserting as to the public record requests made by plaintiff prior to the date of these interrogatory requests.

ANSWER:

INTERROGATORY NO. 3:

For each statutory exemption, privilege, or declaration listed in your answer to interrogatory 2, state the number of pages of records withheld for each exemption, privilege, or declaration.

ANSWER:

INTERROGATORY NO. 4:

For each of Plaintiff's records requests, state the manner in which you conducted the search including who conducted the search, which search terms were used, which system was used, whether any records were deleted or removed prior to search, and whether you performed searches of both university and non-university email accounts in your search. If you searched non-university accounts, list the ones that were searched, including who conducted the search, which search terms were used, which system was used, whether any records were deleted or removed prior to search. For each request, please explain how attachments were handled and whether any and all attachments were reviewed and included in the productions. Please also explain – for requests that included searches of texts, Signal or WeChat communications, and collaborative software platforms such as Google Docs, Google Sheets, Microsoft 365, Slack, and Basecamp – how those searches were carried out.

ANSWER:

INTERROGATORY NO. 5:

Characterize each record that you are withholding that was requested by the plaintiff, including the person or persons who created or received the records, what the subject (include the subject line for records with subject lines) of the record is, and under what exemption, privilege, or declaration you are asserting as to each record.

ANSWER:

INTERROGATORY NO. 6:

State whether you are withholding any communications from Shi Zhengli or from other current or former staff at the Wuhan Institute of Virology, and if so, under which exemption, privilege, or declaration. If you are withholding such communications, also state how many pages of communications with Shi Zhengli or other current or former Wuhan Institute of Virology staff are being withheld?

ANSWER:

INTERROGATORY NO. 7:

State whether you are withholding any communications from Peter Daszak or from other current or former staff of the EcoHealth Alliance, and if so, under which exemption, privilege, or declaration. If you are withholding such communications, state how many pages of communications with Peter Daszak or other EcoHealth Alliance staff are being withheld.

ANSWER:

INTERROGATORY NO. 8:

State whether you are withholding any communications regarding or related to the DEFUSE proposal, and if so, under what exemption, privilege, or declaration. If you are withholding such communications, state how many pages of communications regarding or related to the DEFUSE proposal are being withheld.

ANSWER:

INTERROGATORY NO. 9:

State whether you are withholding any communications by or between Linfa Wang and, if so, under what exemption, privilege, or declaration. If you are withholding such communications, state how many pages of communications with Linfa Wang are being withheld.

ANSWER:

INTERROGATORY NO. 10:

State whether you are withholding any communications concerning or containing the keyphrases "furin cleavage site" or "FCS" or "furin site" and if so, the number of pages and under what exemption, privilege, or Declaration.

ANSWER:

INTERROGATORY NO. 11:

State whether withholding any communications containing the following restriction site keywords or keyphrases: (a) BsmBI; (b) BsaI; (c) SexAI; (d) Sacl; (e) Golden Gate; (f) Eco53kI; (g) NaeI; (h) NgoMIVx, and, if so, under what exemption, privilege, or declaration.

ANSWER:

INTERROGATORY NO. 12:

For plaintiff's first public records request, state why UNC produced only approximately six pages of records for the date range of March 20, 2019 to January 19, 2020 and how many pages you exempted from disclosure for that date range. For each record that was withheld during that date range, state the names of the person or persons who created or received the records, what the subject (include the subject line for records with subject lines) of the record is, and under what exemption, privilege, or declaration you are asserting as to each record.

ANSWER:

This the 20th Day of June, 2023.

WALKER KIGER, PLLC
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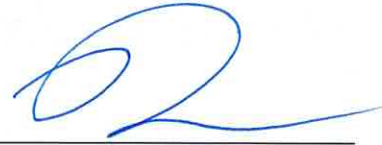
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing **PLAINTIFF'S FIRST INTERROGATORIES TO BE ANSWERED BY DEFENDANT THE UNIVERSITY OF NORTH CAROLINA AT CHAPEL HILL** were served upon counsel by electronic mail to opposing counsel's email address of record as follows:

Melissa Walker, mwalker@ncdoj.gov

This the 20th day of June, 2023.



David "Steven" Walker
NC Bar #34270