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4

5 David Abrams, IN PRO PER

6 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
7 **FOR THE COUNTY OF LOS ANGELES**  
8

9 David Abrams,  
10 Plaintiff(s),  
11 vs.  
12 Regents of the University of California  
13 Defendant(s).  
14

) Case No.: 19STCP03648  
)  
) **PETITIONER'S MEMORANDUM OF**  
) **POINTS AND AUTHORITIES IN**  
) **SUPPORT OF COMPLAINT FOR**  
) **INJUNCTIVE RELIEF AND PETITION**  
) **FOR WRIT OF MANDATE**  
)  
) **DATE: 3/11/2021**  
) **TIME: 9:30am**  
) **DEPT: 85**  
)  
) Judge: Hon. James C. Chalfant  
) Dept: 85  
) Action Filed: 8/22/2019  
) Trial Date: March 11, 2021

17 \_\_\_\_\_ )  
18 )  
19 )  
20 Does 1-8, )  
21 Intervenor(s) )  
22 vs. )  
23 David Abrams )  
24 Defendant in Intervention )  
25 )  
26 \_\_\_\_\_ )

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1 **I. Introduction**

2 This is a Records Act case in which Petitioner seeks to learn the names (and only the names)  
3 of individuals who spoke at UCLA at a university-subsidized conference for Students for Justice in  
4 Palestine (the "SJP Conference" or the "Conference"). Not only did UCLA provide space and  
5 security for the conference, it also provided a direct cash subsidy.

6 The Court's decision in this matter is straightforward based on controlling authority from the  
7 California Supreme Court. In the case of *CBS Inc. v. Block*, 42 Cal.3d 646 (1986) the Court held  
8 that the LA County Sheriff was required to produce the names of registered gun owners in Los  
9 Angeles, that mere speculation about possible endangerment was not enough to overcome the  
10 public interest in learning the names in question.

11 Similar to the situation in *CBS*, both Defendant Regents of the University of California (the  
12 "University" or "Defendant") and Intervenors John and Jane Does 1-8 (the "SJP Intervenors" or  
13 "Intervenors") have alleged concerns about possible harm in revealing the names of speakers. Even  
14 mild scrutiny shows that those concerns are both speculative and baseless. Significantly, both the  
15 Defendant and the Intervenors have failed to identify a single individual who was the victim of  
16 unlawful conduct as a result of speaking at a past SJP conference. Indeed, the Defendant and the  
17 Intervenors have failed to produce competent evidence identifying even one individual who was the  
18 victim of unlawful conduct as a result of anything.

19 The University and SJP Intervenors attempt to get around this problem by (1) conflating  
20 legitimate public criticism with "threats and harassment"; (2) identifying people who were publicly  
21 criticized as a result of their anti-Semitic statements and insinuating -- without any basis -- that such  
22 persons would have suffered the same criticism had they merely spoken at an SJP conference.

23 In short, these parties' claimed concerns are both baseless and speculative and do not come  
24 anywhere near the standard of *CBS Inc. v. Block*. Indeed, this matter presents a more compelling  
25 case for disclosure than that of *CBS v. Block* for two reasons: First, the public has a legitimate and  
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1 strong interest in learning how public monies are being spent -- the individuals whose names were  
2 at issue in *CBS v. Block* had not been receiving public funds. Second, the individuals at issue in  
3 *CBS v. Block* had not engaged in any public activities but were rather people who possessed  
4 firearms at their homes. Here, the individuals all made presentations on the grounds of a public  
5 university.

6  
7 **II. Facts**

8 In November of 2018 the University hosted a conference (the "Conference" or the "SJP  
9 Conference") put on by a group called "Students for Justice in Palestine" ("SJP") which Conference  
10 was also financially subsidized by the University by means of a "BEST" grant. (Abrams  
11 Declaration Para. 3-5 & Exhibits A, A-1) The University's Chancellor publicly defended the  
12 decision to host the SJP Conference, citing "open" debate. (Abrams Declaration Para. 6 & Exhibit  
13 B).

14 In the past, SJP has hosted speakers who were affiliated with terrorist organizations.  
15 (Abrams Declaration Para. 7). Further, SJP is notorious for its "disruptive and coercive" actions on  
16 college campuses. *Awad v. Fordham University*, Case No. 2020-00843, Slip Op. at 3 (N.Y. App.  
17 Div. Dec. 22, 2020)

18 Petitioner served a records request seeking the identities of the speakers at the Conference.  
19 (Abrams Declaration Para. 8). Defendant has declined the request, speculating about  
20 "endangerment" and "blacklisting" of these individuals on a web site known as "Canary Mission."  
21 (Abrams Declaration Para. 9-10 & Exhibit D)

22 The Defendant's refusal to produce the records was based on California Government Code  
23 Section 6255 which provides as follows:

24 The agency shall justify withholding any record by demonstrating . . .that on the facts of the  
25 particular case the public interest served by not disclosing the record clearly outweighs the  
26 public interest served by disclosure of the record.

27 California Government Code Section 6255; (Abrams Declaration Para. 9-10 & Exhibit D)

28

1 In attempting to rely on this provision of law, the Defendant stated as follows:

2 *We have been advised, and have confirmed, that speakers and organizers of previous NSJP*  
3 *conferences have been targeted on internet blacklists such as canarymission.org and have*  
4 *become the objects of threats and harassment.*

5 (Abrams Declaration Para. 9-10 & Exhibit D)

6 Nevertheless, in discovery the Defendant was unable to identify a single individual who has  
7 been actually threatened or harassed as a result of speaking at an SJP conference. (Abrams  
8 Declaration Para. 11). Rather, the Defendant identified a number of individuals who were publicly  
9 called out after having made anti-Semitic statements on social media. (Abrams Declaration Para.  
10 12 and Exhibit E) The University insists that these public call-outs constitute actual criminal  
11 activity under the California Penal Code. (See Abrams Declaration Paragraph 13).

12 As an example of this supposedly criminal activity the Defendant identified an individual  
13 named Lisa Marie Mendez who evidently had stated the following on social media:

14 The Jews... white Devils hidden behind a symbol of your faith, whose only desire is  
15 capitalization...ITS YOU [Jews] DAMN STUPID F\*\*KING BORED A\*\* SHEEP-PEOPLE  
16 that kept this going on and on.....And to no avail. You know who cares if I told you  
people I hate your greedy a\*\*es? NOBODY. At least, nobody that matters..."

17 (Abrams Declaration Paragraph 14 and Exhibit F)

18 As a result, somebody apparently posted a flyer on UCLA's campus stating Ms. Mendez had  
19 "allied [herself] with Palestinian terrorists to perpetuate BDS and Jew hatred on this campus." (See  
20 Abrams Declaration Para. 12 and Exhibit E).

21 Defendant apparently contends that merely posting a flyer correctly accusing Ms. Mendez of  
22 Jew hatred constitutes actual criminal activity under Penal Code Section 646.9. (Abrams  
23 Declaration Para. 13). Ms. Mendez' anti-Semitic rants did contain one interesting observation:

24 I made ignorant, racist comments in public. Sure. But I did them in public, for every one to  
25 hear. I'm not hiding anything. Look me up all you want. You'll find nothing. You know  
26 why? **Because I can say whatever I want. It's a public forum.**

27 (Abrams Declaration Exhibit F) (emphasis added).

28

1           Despite the University's contentions, the University has offered no evidence that Ms.  
2 Mendez ever presented at an SJP conference. Rather, the facts show that she publicly made anti-  
3 Semitic statements and someone responded by publicly calling her out for her anti-Semitism.  
4 Nothing more and nothing less.

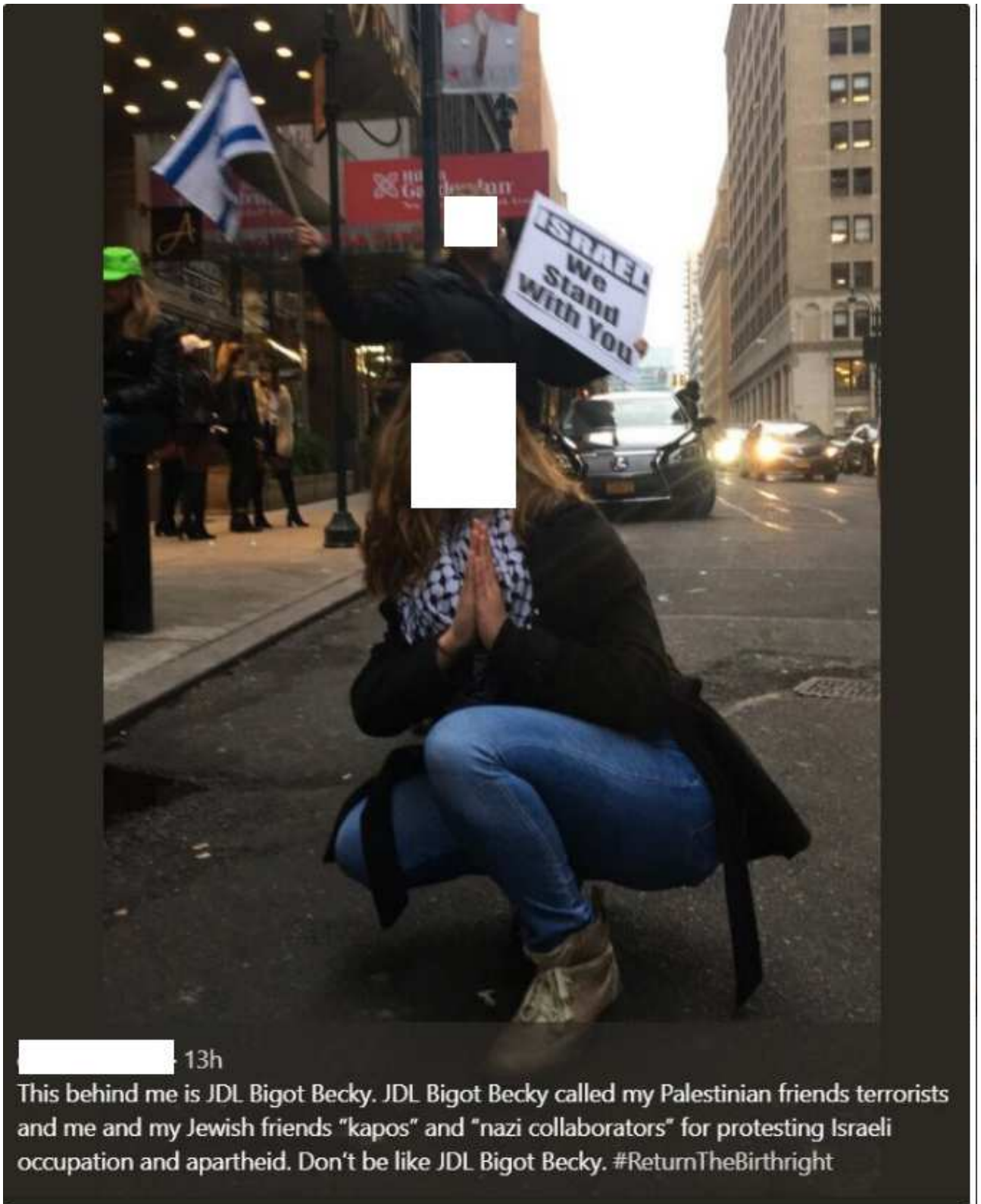
5           As far as the Canary Mission web site goes, the University has offered no evidence at all  
6 that its activities are improper or illegal. (Abrams Declaration Para. 11). Indeed, Canary Mission  
7 recently publicized the name of a physician who had threatened on social media to give the wrong  
8 medicine to Jewish patients. (Abrams Declaration Para. 16-17) As a result, the physician in  
9 question was dismissed from her job. (*See id.*) The University does not even try to claim that this  
10 supposed "blacklisting" is improper in any way.

11           After the records request at issue was denied, Petitioner appealed to Los Angeles County  
12 Superior Court and this proceeding ensued.

13           Subsequently, the SJP Intervenors intervened in this matter, alleging that they are  
14 individuals who spoke at the Conference and objecting to the disclosure of their names. (*See*  
15 Motion for Leave to File Complaint in Intervention dated August 31, 2020) In support of their  
16 application, these individuals submitted a number of self-serving hearsay affidavits. (*See id.*) Of  
17 course there is no way to verify that the contents of these affidavits are accurate. (Abrams  
18 Declaration Para. 19). It is not even possible to verify that there were executed by people who  
19 actually spoke at the Conference. (*Id.*)

20           Nevertheless, accepting the hearsay affidavits as true, they the affidavits appear to disclose  
21 primarily lawful public criticism as opposed to unlawful threats and harassment. For example, Jane  
22 Doe Number 4 complains that as a result of her anti-Israel advocacy, she has been called a "kapo,"  
23 "anti-Jewish," and a "stupid bitch." (*See id.* Exhibit 4). Jane Doe Number 4 does not provide any  
24 context for these comments, however it is reasonable to assume that the following picture,  
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1 apparently posted on social media, is illustrative of the context in which an anti-Israel activist might  
2 be called a "kapo." (Abrams Declaration Para. 20-22 and Exhibit G).



1           Apparently this individual took part in a public demonstration in New York City in late  
2 2017; she was dressed in a garment which is known to be associated with anti-Israel advocacy; she  
3 encountered a demonstrator who was waving an Israeli flag; some words were exchanged; and a  
4 pro-Israel demonstrator called this individual a "kapo." (*Id.*) It is also worth noting that the activist  
5 depicted here apparently publicly posted a picture of her adversary "JDL Bigot Becky" on social  
6 media. (*Id.*) As a general matter, insults, public criticism (fair and unfair), and sundry invective are  
7 extremely common when the topic of Israel comes up. (Abrams Declaration Para. 23).  
8

### 9 **III. Argument**

10           The legal standard which applies to this matter is straightforward. In order to avoid  
11 producing the records, Defendant must demonstrate that "the public interest served by not  
12 disclosing the record *clearly outweighs* the public interest served by disclosure of the record."  
13 California Government Code Section 6255 (emphasis supplied).

14           Here the public interest in disclosing the records includes (1) permitting citizens to  
15 investigate whether the University of California is hosting terrorists or other criminals on campus;  
16 (2) allowing the public to learn how the University of California is spending public monies; and (3)  
17 permitting the public to respond to free speech with more free speech. Indeed, the Chancellor of the  
18 University of California cited the principle of "open debate" in justifying the decision to permit the  
19 conference to take place. "Open debate" is not consistent with allowing the conference to take place  
20 under the cloak of secrecy.

21           By contrast, no public interest at all will be served in keeping the names at issue a secret.  
22 Neither the University nor the SJP Intervenors have identified any actual facts or incidents which  
23 support its claimed concern about threats or harassment. Indeed, they have not identified a single  
24 individual who ever suffered even the slightest negative consequences as a result of (1) speaking at  
25 an SJP conference; and (2) having that fact made public.

26           And this is of course assuming that the SJP Intervenors' self-serving hearsay affidavits are  
27 accurate. At a minimum, it is reasonable to assume that all of the insults and criticism described in  
28 those affidavits are the result of mutual vituperation.

1 Defendant did identify a number of incidents which it claims constitute actual criminal  
2 activity. For example, it identified an individual named Lisa Marie Mendez who was allegedly  
3 subject to criminal harassment as a result of posting anti-Semitic statements on social media.  
4 Specifically, Defendant apparently claims that a public flyer accusing Ms. Mendez of Jew hatred  
5 constitutes criminal harassment.

6 The penal code provision apparently relied on by the Defendant provides as follows:

7 Any person who willfully, maliciously, and repeatedly follows or willfully and maliciously  
8 harasses another person and who makes a credible threat with the intent to place that person  
9 in reasonable fear for his or her safety, or the safety of his or her immediate family is guilty  
10 of the crime of stalking, punishable by imprisonment in a county jail for not more than one  
11 year, or by a fine of not more than one thousand dollars (\$1,000), or by both that fine and  
12 imprisonment, or by imprisonment in the state prison.

13 \* \* \*

14 For the purposes of this section, "harasses" means engages in a knowing and willful course  
15 of conduct directed at a specific person that seriously alarms, annoys, torments, or terrorizes  
16 the person, and that serves no legitimate purpose.

17 California Penal Code Section 646.9(a), (g).

18 Defendant's contention is wrong for more than one reason. For one thing, the flyer at issue  
19 contains no threat at all let alone a credible threat. For another, the flyer serves a legitimate purpose  
20 by correctly informing the community that Ms. Mendez is a vicious anti-Semite. Finally, the flyer  
21 is obviously well within the bounds of speech that is protected by the United States Constitution.

22 *See* U.S. Const. Amdt. 1.

23 Ms. Mendez, despite her personal issues, appears to have a better understanding of free  
24 speech than the University. As Ms. Mendez put it herself, "I can say whatever I want. It's a public  
25 forum." Put simply, Ms. Mendez has a constitutional right to publicly call Jews "white Devils," and  
26 Jewish activists have the right to advise the public that Ms. Mendez is spreading Jew hatred.

27 Unfortunately, the University seems to subscribe to the principle of "Free speech for me, but  
28 not for thee." Such persons seem to think that any speech they do not like constitutes criminal  
threats and harassment. This is simply not the case. Indeed, it is the very speech that the



1 government does not like which the point of the First Amendment. Speech which is approved of by  
2 the government does not need First Amendment protection.

3         Moreover, it must be emphasized again that there is no evidence for the University's  
4 apparent contention that Ms. Mendez has spoken at an SJP conference, let alone that the flyer was  
5 put up as a result of her having spoken at an SJP conference. Rather, from the context it is clear that  
6 Ms. Mendez was publicly accused of spreading Jew hatred for the simple reason that she had in fact  
7 spread Jew hatred. Ms. Mendez and her defenders may not like the fact that free speech works two  
8 ways, but that is the law.

9  
10         Essentially the same is true of the incidents complained of by the SJP Intervenors. Almost  
11 everything they complain of is well within the bounds of protected speech. For example, Jane Doe  
12 #2 claims to have received an email stating "Palestinian women are so filthy we would not even  
13 think of raping them." To be sure this is offensive but even racist and sexist comments are  
14 protected by the First Amendment. The fact that this e-mail made Jane Doe #4 "feel very unsafe"  
15 does not change this.

16  
17         Moreover, Jane Doe #4 had apparently made public statements which some people  
18 understood to indicate that Israeli men are all rapists. This is a perfect example of the sort of mutual  
19 vituperation which is perfectly legal and commonplace when the subject of Israel comes up in  
20 public discourse. Jane Doe # 4 has the legal right to insinuate that all Israeli men are rapists and  
21 Jane's detractors have the right to publicly assert that Palestinian Arab women are "filthy." This is  
22 all extremely ugly to be sure, but there is nothing illegal about it, at least in the United States. As  
23 the saying goes, "If you can't stand the heat, get out of the kitchen." The SJP Intervenors are  
24 demanding that their kitchen (and only their kitchen) be provided with state-subsidized air-  
25 conditioning. There is no basis in law or common sense for such a demand.

26  
27         While it is true that some of the SJP Intervenors claim to have witnessed actual threatening  
28 behavior, there are no particulars provided; no police reports; no criminal charges against anyone;

1 and no way to verify that these claims are anything more than the sort of exaggeration one would  
2 expect from committed political activists making claims from behind the cloak of anonymity.  
3 Moreover, there is no evidence whatsoever that any actual threatening behavior was directed at  
4 anyone simply for presenting at a conference.

5  
6 In short, it is extremely clear that the actual concern of the University and the SJP  
7 Intervenors is their wish to be protected from offensive but lawful public criticism as opposed to  
8 actual unlawful threats and harassment. Under such circumstances there is simply no way that  
9 either the University or the SJP intervenors could show that the public interest in keeping the  
10 records secret "clearly outweighs" the public interest in disclosure.

11 The fact is that anti-Israel activists have the right to publicly demonstrate against Birthright;  
12 pro-Israel activists have the right to hurl insults (including "kapo" and "stupid bitch"); and anti-  
13 Israel activists have the right to photograph and publicly criticize those who do so. There is simply  
14 nothing unlawful about any of this behavior.

15 Although this is not a close case, if there were any doubt as to Section 6255 were to be  
16 interpreted, those doubts are foreclosed by the case of *CBS Inc. v. Block*, 42 Cal.3d 646 (1986). In  
17 that case the California Supreme Court that the LA County Sheriff was required to produce the  
18 names of registered gun owners in Los Angeles, that mere speculation about possible endangerment  
19 was not enough to overcome the public interest in learning the names in question.

20 The case for disclosure is of course much stronger here than in *CBS v. Block*. It regularly  
21 happens that peoples' homes are burglarized and firearms stolen. Moreover, there were no concerns  
22 in *CBS v. Block* about open debate or about how government monies were being spent.  
23 Nevertheless, the California Supreme Court directed disclosure. Here, there is no indication at all  
24 of any harm to any identified speaker while on the other side there is a strong argument to be made  
25 in favor of "open debate" and disclosure.

26 Accordingly, it is clear that the exception relied upon by the Defendant is inapplicable and it  
27 should be directed to produce the information.

28

1 **VII. Conclusion**

2 For the foregoing reasons, the Petition should be granted.

3 Respectfully submitted,

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5 DATED: December 25, 2020

6 \_\_\_\_\_  
7 David Abrams  
8 In Pro Per

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1 David Abrams  
305 Broadway Suite 601  
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2 212-897-5821  
3 Petitioner/Plaintiff, In Pro Per  
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8 SUPERIOR COURT OF CALIFORNIA  
COUNTY OF LOS ANGELES  
9

10 David Abrams ) Case No.: 19STCP03648  
11 Plaintiff(s) )  
12 vs. ) DECLARATION IN SUPPORT OF  
13 Regents of the University of California ) COMPLAINT FOR INJUNCTIVE RELIEF  
14 Defendant(s) ) AND PETITION FOR WRIT OF MANDATE  
OF DAVID ABRAMS  
15

16 I, David Abrams, Declare as follows.

- 17 1. I am the Plaintiff/Petitioner in the above referenced matter. I make this declaration in  
18 support of my position at trial. As set forth in more detail in my memorandum of points and  
19 authorities, I am respectfully asking that the Court direct the Respondent in this matter to comply  
20 with a records request I made.  
21  
22 2. The records request asks the Respondent/Defendant to produce documents which disclose  
23 the identities of individuals who presented at the 2018 conference (the "Conference") of Students  
24 for Justice in Palestine ("SJP") or ("NSJP").  
25  
26 3. Attached hereto as Exhibit A is a true copy of a transcript of the PMQ deposition of the  
27 Respondent in this matter ("Respondent" or the "University" or "Defendant").  
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1 4. The exhibits attached to the deposition transcript are true copies of documents produced  
2 by the University in the course of discovery in this matter. In particular, Exhibit A-1 to Exhibit  
3 A was produced by the University in response to the following document request:

4 All applications, correspondence, or similar documents concerning any grant or subsidy  
5 provided by the Defendant to or concerning the National Students for Justice in Palestine  
6 conference.

7 5. Page 3 of Exhibit A-1 to Exhibit A confirms that the conference was funded in part by  
8 the "BEST" grant which was an \$8000 grant made by the University's Office of Diversity Equity  
9 and Inclusion (see Page 1 of Exhibit A-1).

10 6. Attached hereto as Exhibit B is a true copy of a news release I downloaded from the  
11 University's web site. The red annotations are of my adding.

12 7. Based on my research, I understand that at past conferences, SJP has hosted individuals  
13 associated with terrorist organizations. For example, I understand that in 2015, SJP hosted an  
14 individual named Rasmia Odeh who is associated with the Popular Front for the Liberation of  
15 Palestine.  
16

17 8. Since I am interested in researching the activities of anti-Israel terrorists, I served a  
18 records request on the University asking for the names and only the names of individuals who  
19 presented at the Conference. True copies of my records requests are attached hereto as Exhibit  
20 C.  
21

22 9. The University denied my request; a true copy of the denial letter is attached hereto as  
23 Exhibit D.  
24

25 10. In the course of discovery in this matter, I asked the University to produce information  
26 concerning its claim set forth in Exhibit D that "speakers and organizers of previous NSJP  
27  
28

1 conferences have been targeted on internet blacklists such as canarymission.org and have  
2 become the objects of threats and harassment."

3 11. I have reviewed the University's extensive responses and found no evidence whatsoever  
4 supporting the University's claim nor any evidence of unlawful conduct on the part of Canary  
5 Mission.

6 12. Attached hereto as Exhibit E is a true copy of an excerpt from the University's responses  
7 to interrogatories I served along with an excerpt of the documents produced and identified by the  
8 University in connection with that discovery response -- the very first page.

9 13. The University subsequently identified the same page as the very first page in its  
10 response to an interrogatory asking the University to identify all incidents which the University  
11 contends constitute actual criminal activity.

12 14. Evidently, the page includes a photograph of a flyer which had been posted on the UCLA  
13 campus. Among other things, the flyer identifies an individual named "Lisa Marie Mendez." I  
14 researched Ms. Mendez and found no evidence that she ever presented at an SJP Conference.  
15 Rather, it appears that she had publicly posted various rants to social media. A sample is  
16 attached hereto Exhibit F.

17 15. Although I do not work for Canary Mission, in the course of research for this proceeding  
18 I reviewed the contents of the Canary Mission web site in order to scrutinize the University's  
19 claims and in order to respond to the University's discovery requests.

20 16. In doing so, I was able to identify two and only two individuals who faced tangible  
21 consequences as a result of having facts about them publicized on the Canary Mission web site.  
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1 17. The first of those individuals is a physician named Dr. Lara Kollab. This individual  
2 apparently lost her job after Canary Mission discovered that she had publicly stated she intended  
3 to purposely give the wrong medicines to her Jewish patients.

4 18. The second individual apparently lost her job as a pre-school teacher as a result of the  
5 following "tweet": **How many Jews died in the Holocaust? Not enough**

6  
7 19. I have reviewed the affirmations submitted by the Intervenors in this matter. I have no  
8 way of verifying the accuracy of these materials or even understanding the context of the claims  
9 made in the affirmations. For example, Jane Doe #4 alleges that she was called a "kapo" as a  
10 result of her anti-Israel advocacy. The word "kapo" means a Jewish person who collaborated  
11 with the Nazis during the Holocaust.

12  
13 20. Attached hereto as Exhibit G is apparently a social media picture which I downloaded in  
14 which an anti-Israel advocate states that she was referred to as a "kapo." I am not claiming that  
15 this individual is Jane Doe #4, I am simply offering this picture to provide a reasonable  
16 assumption about context. I did white out the individual's face out of an abundance of caution  
17 however, although I should note that (1) Exhibit G is a picture that was apparently publicized by  
18 the activist in question herself; and (2) I am not aware of any law against photographing  
19 participants in a public demonstration and posting those pictures online with commentary.

20  
21 21. The image in Exhibit G is apparently a picture of a protest which took place in December  
22 of 2017 in New York, New York. The activist in the foreground of the picture is wearing a  
23 garment known as a "keffiyeh" around her neck. Black and white keffiyehs are commonly  
24 associated with anti-Israel advocacy.  
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1 22. In any event, the woman in the background of the picture is, of course, waving an Israeli  
2 flag. Thus, it is hardly a surprise that the two women (apparently) exchanged some unpleasant  
3 words.

4 23. As a political activist who regularly advocates on behalf of Zionism, I can say without a  
5 doubt that there is a lot of nastiness, insults, accusations (both fair and unfair), and various  
6 invective which goes back and forth on a regular basis.  
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8 I declare under penalty of perjury under the laws of the State of California that the foregoing is  
9 true and correct.  
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11 Dated: December 25, 2020



12 David Abrams  
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# Exhibit A

**In The Matter Of:**  
*ABRAMS v.*  
*REGENTS OF THE UNIVERSITY OF CALIFORNIA*

---

*MICK DeLUCA*  
*November 12, 2020*

---

*L.J. HART & ASSOCIATES, INC. / BARRON & RICH*  
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*Sacramento, CA 95815*  
*(916) 922-9001*  
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IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

--o0o--

DAVID ABRAMS,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	No. 19STCP03648
	)	
REGENTS OF THE	)	
UNIVERSITY OF	)	
CALIFORNIA,	)	
	)	
Defendants.	)	

--o0o--

Videoconference Deposition of

MICK DeLUCA

Thursday, November 12, 2020

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L.J. HART & ASSOCIATES, INC.  
BARRON & RICH  
Certified Shorthand Reporters

Reported by: KENDRA L. GILLIE, CSR License 9643

**A P P E A R A N C E S**

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**Also Present: Chaya Bracha Walkendfeld**  
(Via Videoconference)

--oOo

I N D E X

Examination by:	Page
Mr. Abrams	4

--oOo--

E X H I B I T S

Plaintiff's Exhibit No.	Description	Page
<a href="#"><u>Exhibit A-1</u></a>	UCLA Office of Equity, Diversity and Inclusion Event documents; 5 pages	19
<a href="#"><u>Exhibit A-2</u></a>	E-mail dated 11/7/2018; 3 pages	46

--oOo--

MICK DeLUCA

1 BE IT REMEMBERED, that on Thursday, the 12th  
2 day of November, 2020, commencing at the hour of 9:30  
3 a.m. thereof, at Sacramento, California, before me,  
4 Kendra L. Gillie, a Certified Shorthand Reporter, in and  
5 for the County of Sacramento, State of California, there  
6 appeared remotely before me

7 MICK DeLUCA,  
8 Witness herein, called, as a witness, by the Plaintiff,  
9 who, being by me first duly sworn, was thereupon  
10 examined and interrogated as hereinafter set forth.

11 EXAMINATION

12 By: DAVID ABRAMS, Attorney at Law, counsel on behalf of  
13 the Plaintiff:

14 Q Good morning, Mr. DeLuca. My name is --

15 A Good morning.

16 Q Good morning. So my name is David Abrams, and  
17 I'm the petitioner in this matter.

18 Have you ever been deposed before?

19 A Yes, I have.

20 Q Okay. And when was that?

21 A I think the last time was two years ago.

22 Q Okay. And what sort of proceeding was that  
23 that you were deposed in?

24 A It was a claim against an event held at the  
25 University.

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1 Q I see. So some kind of --

2 A A contractual -- it was a contractual  
3 disagreement on an event.

4 Q I see. And was that in the Superior Court of  
5 Los Angeles?

6 A I'm not sure exactly where that was filed.  
7 But, you know, I was deposed in an attorney's office in  
8 Los Angeles.

9 Q Okay. Well, since it's been a couple years  
10 since your last deposition, I'm just going to go over  
11 the ground rules with you.

12 Is that okay?

13 A Perfectly fine, yes.

14 Q So, first of all, you heard that you were  
15 given an oath at the beginning; right?

16 A Yes, I did.

17 Q So what that means is you have a legal  
18 obligation to tell the truth today.

19 Do you understand that?

20 A Yes, I do.

21 Q So that even though we're here on this  
22 videoconference, you have just as much of an obligation  
23 to testify truthfully as you would if we were in a  
24 courtroom.

25 Do you understand that?

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1 A Fully understand.

2 Q Okay. And of course there's a court reporter  
3 who is taking down everything we say.

4 Do you understand that?

5 A Yes, I do.

6 Q And since that's happening, it's important  
7 that you give verbal responses to questions I ask. So,  
8 in other words, you can't answer a question by shaking  
9 your head or saying "uh-huh" or anything like that.

10 Do you understand?

11 A Yes, I do.

12 Q Okay. And it's also important that we not  
13 talk at the same time. So if I'm in the middle of  
14 asking a question and even if you kind of know where you  
15 think I'm going with the question, if you could wait  
16 until I'm done asking it before answering, that would be  
17 helpful.

18 Do you understand?

19 A Yes, I do.

20 Q Now, if you don't understand a question that I  
21 ask, you would need to advise me and I'll try to  
22 rephrase it.

23 Do you understand that?

24 A Yes, sir.

25 Q Okay. So that way, if I ask a question and



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1 you give me an answer, I'm going to assume that you  
2 understood the question and you're answering to the best  
3 of your ability. Okay?

4 A That's fair.

5 Q Okay. So are you employed now, sir?

6 A Yes, I am.

7 Q You know, I forgot one other question as just  
8 by way of background.

9 Are you under the influence of any alcohol,  
10 drugs or medication that would affect your ability to  
11 testify truthfully today?

12 A No, I'm not.

13 Q Okay. So what's the name of your employer?

14 A UCLA.

15 Q Okay. And that's the university in southern  
16 California?

17 A University of California, Los Angeles.

18 Q Okay. And since obviously we'll be talking a  
19 lot about UCLA today, I might be referring to it as "the  
20 University," as "UCLA," more formally as "the Regents."  
21 But can you understand that we're talking about the same  
22 institution that you work for? Okay?

23 A Yes.

24 Q All right. What's your position, sir?

25 A I'm the assistant vice chancellor of campus

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1 life.

2 Q And can you just tell me in a few words what  
3 your job duties are?

4 A Oversee a broad scope of activities from  
5 student organizations, fraternities and sororities,  
6 recreation programs, veterans services, student events  
7 on campus, sports and recreation, oversee the --

8 Q How long have you held this position for, sir?

9 A I've been in this specific role six and a half  
10 years.

11 Q I see. And do you have a staff working  
12 underneath you?

13 A Yes, I do.

14 Q And approximately how many people work  
15 underneath you?

16 A I believe I have 12 direct reports. The units  
17 I represent probably have approaching 400 full-time  
18 staff. And we employ about 2,500 student employees over  
19 the course of the year.

20 Q I see. And who do you report to, sir?

21 A I report to the vice chancellor of student  
22 affairs.

23 Q And what is that person's name?

24 A Monroe Gorden.

25 Q I see. Okay. And did you do anything to

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1 prepare for today's deposition?

2 A Yes, I did.

3 Q And can you tell me what you did to prepare?

4 A Met with our university attorneys, reviewed  
5 the discovery documents, reviewed some of my own event  
6 notes from 2018 and reviewed some of the specific law  
7 enforcement reports. And I met with some key  
8 stakeholders on campus that were involved in the events  
9 back in 2018.

10 Q I see. And when you talk about "the event,"  
11 you're referring to the SJP conference of 2018?

12 A Yes. The NSJP conference 2018.

13 Q So, you know, I may refer to that as the "SJP  
14 conference," the "NSJP conference," "the conference."  
15 That's the main thing we're talking about today.

16 Do you understand that?

17 A Yes, I do.

18 Q So any time I talk about "the conference,"  
19 that's what I'm talking about --

20 A That's clear.

21 Q -- or "the event." Let me ask you this.

22 Actually, if we could -- just to save trouble,  
23 Ms. Stein, are you claiming attorney-client privilege as  
24 to your discussions with Mr. DeLuca?

25 MS. STEIN: Yes. Absolutely.

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1 MR. ABRAMS: Okay.

2 Q So I'm not going to ask you about the  
3 conversations you've had with your legal counsel since  
4 apparently those -- privilege is being claimed as to  
5 that.

6 Do you understand?

7 A Yes, I do.

8 Q So if I ask you a question, try to avoid  
9 blurting out the contents of a conversation you had with  
10 your legal counsel. Okay?

11 A Yes.

12 Q Okay. Now, aside from your counsel, you  
13 mentioned that you met with some stakeholders.

14 Can you tell me the names of those people?

15 A Yes. I met with Mike Cohn, C-o-h-n. Mike is  
16 the director of our Student Organizations, Leadership  
17 and Engagement. The acronym is SOLE.

18 I met with Police Chief Tony Lee, met with  
19 Lieutenant Kevin Kilgore, who was the incident commander  
20 for the event in 2018.

21 MS. STEIN: Mick, just answer the question.  
22 He's asking you for the names of the people you met  
23 with.

24 THE WITNESS: Okay. And I met with Sergeant  
25 Roland Ruiz.

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1 MR. ABRAMS Q: Okay. And without describing  
2 the nature of your conversations when you met with your  
3 attorneys, was there anyone else present?

4 A No, there was not.

5 Q Okay. Fine. Now, if you could just give me a  
6 second.

7 So just so we're clear, you have the same  
8 position now as you did when the conference took place  
9 back in 2018; right?

10 A Correct.

11 Q Okay. And can you tell me, like, what you  
12 yourself did, if anything, in connection with that  
13 conference?

14 A Yes. I'd be happy to. The areas of our  
15 student organizations report under me. So in this case,  
16 it's similar to any student event.

17 Once we became aware of the intern of a  
18 student organization event, I began to meet with the  
19 advisors.

20 Q Sir, so I'm really sorry to interrupt you, but  
21 I'm not able to hear what you're saying. There's kind  
22 of a problem with the audio. There's, like, an echo.

23 Do you think you could try to adjust your  
24 microphone?

25 A Is that better?

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1 Q Very slightly better. I see the court  
2 reporter shaking her head. It's funny. For a second, I  
3 thought you were outdoors but I guess -- it's, like, a  
4 background. I think it's like -- it's a background that  
5 you can display.

6 A Is that still an echo?

7 Q That's better. Still an echo, but at least we  
8 can hear what you're saying.

9 A Is this better if I hold this here?

10 Q Yeah. That's a lot better.

11 A Okay. Let me try that. I apologize.

12 I was describing much like any other student  
13 event, when we were made aware of an interest of a  
14 student organization to host an event, I began meeting  
15 with the advisors of the various organizations. In this  
16 case, SJP UCLA has an advisor in this office called  
17 SOLE, also began to meet with the director.

18 Also, very similar to any other student event  
19 of any nature, I notified officials of the University of  
20 the interest. We began meeting as a campus very similar  
21 in protocol to any event or what we designate a major  
22 event.

23 Our director of student organizations, who has  
24 delegating authority to determine this, would meet the  
25 criteria of our interfaith-based policy. That then

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1 required that we plan and meet with our University of  
2 California PD, UCPD, and those were initiated.

3           Additionally, when students host an event,  
4 they must secure venues on campus, so the coordinators  
5 that handles different venues on campus and our  
6 centralized events office at the University. So this  
7 was all the preliminary kind of planning information,  
8 whether students are hosting the conferences, the  
9 speakers --

10                           (Reporter Clarification)

11           THE WITNESS: I'm on my university computer.  
12 I guess if need be, I could try logging on on a  
13 different laptop.

14                           Are you hearing me now? Mr. Abrams, can you  
15 hear me okay?

16           MR. ABRAMS: Yeah. You were -- you were  
17 starting to fade a little bit there.

18           THE WITNESS: I'll try to speak clearly into  
19 this. So I think just to wrap up on your question, with  
20 central in pulling together the entities on campus to  
21 meet.

22                           And then I end up playing the unique role what  
23 I call the "shuttle diplomacy" role. And I met with  
24 students both for the Students for Justice in Palestine  
25 student organization and their advisor. And I met with

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1 our key student leaders of the Jewish student  
2 organizations on campus and their advisors.

3 MR. ABRAMS Q: I see. So when you say  
4 "advisor," you mean a faculty advisor?

5 A No. It's a staff administrative advisor  
6 through our student organization office. To be a  
7 registered campus organization at UCLA, you're assigned  
8 an advisor through the student organization, student  
9 activity office.

10 Q I see. So that person is an employee of UCLA;  
11 is that correct?

12 A Correct.

13 Q Okay. And in this case, who was the -- that  
14 employee?

15 MS. STEIN: Well, is that a -- I'm going to  
16 object that it invades privacy. Just make sure if  
17 you're not disclosing the names of any Palestinian type  
18 advocate.

19 MR. ABRAMS: Well, you know -- well, let's see  
20 how he answers.

21 THE WITNESS: The key staff member and  
22 director over all the advisors, again, his name is Mike  
23 Cohn. I believe the individual advisors of different  
24 organizations were concerned to have their names  
25 released. So I will indicate that the director's name



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1 is Mike Cohn.

2 MR. ABRAMS Q: I see. So just so we're clear,  
3 you're declining to tell me the name of the UCLA  
4 employees who were involved in organizing the conference  
5 or dealing with the organizers.

6 Is that what your testimony is, sir?

7 MS. STEIN: I'm going to object that it  
8 invades their personal right to privacy.

9 Mick, if they indicated that they wanted their  
10 names to be protected, then I would request that you not  
11 respond to that question and provide the names.

12 MR. ABRAMS: I didn't ask anyone's names,  
13 ma'am. All I ask is if you -- to be clear was that he  
14 was declining to state the names.

15 Can you read back my last question, please?

16 (Whereupon the record was read.)

17 THE WITNESS: I'm declining to provide you the  
18 name upon the request of the specific advisor of one of  
19 the student organizations.

20 MR. ABRAMS Q: I see. Well, is that someone  
21 you spoke to in preparation for today's deposition?

22 A No, it was not.

23 Q Okay. Well, let me ask you this, sir.

24 Did you yourself deal directly with any of the  
25 individuals who organized the conference?

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1 A Yes, I did.

2 Q Okay. And let me ask you this.

3 Did any of those people indicate to you that  
4 their -- at that time a request for a preference that  
5 their names be kept confidential?

6 A Yes. They absolutely all did and had done for  
7 the past number of years related to this student  
8 organization.

9 Q Okay. And did you give them assurances that  
10 their names would, in fact, be kept confidential?

11 A Yes, I did.

12 Q I'm sorry?

13 A Yes, I did.

14 Q Okay. And what did you say to them in terms  
15 of specifics, in terms of those assurances?

16 A Their concern was threats and harassments  
17 against them. I understood that. And we've been  
18 dealing with that for three years prior to the  
19 conference.

20 I assured the students that as students of  
21 UCLA their safety was our top priority and that in  
22 working with them, in building a trust and confidence  
23 with them, that it would be my role to try to represent  
24 and protect their interests.

25 Q Okay. But what specifically, if anything, did

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1 you say in terms of assuring confidentiality of their  
2 identities?

3 A I mean, I don't have independent recollection  
4 of my total conversation from 2018. But I would assume  
5 it would be something that in building a trusting  
6 relationship I understand the importance of their  
7 request for confidence.

8 Q Okay. So are you able to tell me in substance  
9 what you said to them in terms of confidentiality?

10 A I think I've described that to you.

11 MR. ABRAMS: Can you read back his last  
12 answer?

13 (Whereupon the record was read.)

14 MR. ABRAMS Q: So -- and just so we're clear,  
15 in substance what you said was you understood the  
16 importance of the request for confidence; is that  
17 correct?

18 A Yes.

19 Q Okay. And did you say anything else besides  
20 that or did that pretty much sum it up?

21 MS. STEIN: Asked and answered.

22 You can answer if you have anything else to  
23 add.

24 THE WITNESS: I don't have any additional  
25 memory of the specific conversations.

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1 MR. ABRAMS Q: All right. Was anything put in  
2 writing?

3 A Not to my knowledge, no.

4 Q Okay. Let me ask you this. Let me turn to a  
5 slightly different subject.

6 Do you know if the University gave any  
7 financial support to the conference?

8 A Based on the nature of the conference, the  
9 student organization itself, much like many student  
10 organizations, had applied for a broad-based grant, not  
11 specific to the conference, based on their work over the  
12 course of the year.

13 And based on the nature and the intent of the  
14 conference on campus, the students did not apply for any  
15 of our other student funding sources on campus.

16 Q So I guess -- are you saying that the SJP  
17 chapter at UCLA applied for general funding and that was  
18 granted? Is that your testimony?

19 A My testimony is I'm aware that as one of our  
20 1,400 student organizations, they had applied for a  
21 grant through our Equity, Diversity and Inclusion office  
22 for their work over the course of the 2018 and '19  
23 school year.

24 Q Okay. And is it fair to say that part of that  
25 grant application was for monies that were specifically

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1 earmarked for the conference?

2 A I have no specific knowledge that it was  
3 specifically for any conference at UCLA.

4 MR. ABRAMS: I see. All right. Just give me  
5 a second. I'm going to show you -- I'm going to try to  
6 send a document into the system here, so we'll see if  
7 this works or not.

8 MR. KATON: Did you upload it to the chat, Mr.  
9 Abrams?

10 MR. ABRAMS: Yeah.

11 So Court Reporter, Madam Court Reporter, if  
12 you could mark the document. I guess we'll call it A-1.

13 (Whereupon Plaintiff's [Exhibit A-1](#)  
14 was marked for identification.)

15 MR. ABRAMS Q: Mr. DeLuca, if you could just  
16 look at a document we just uploaded to a chat, I would  
17 appreciate it.

18 A Okay. Yes. I see that document.

19 Q Okay. So my question to you is, you see that  
20 there's five pages?

21 A Yes.

22 Q Okay. And have you seen any of those five  
23 pages before today?

24 A Yes. I have seen this document.

25 Q And when did you last see it?

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1 A I reviewed this document yesterday.

2 Q Okay. Had you seen it before yesterday?

3 MS. STEIN: I'm having problems. Hang on.

4 THE WITNESS: Yes. I had seen this. This is  
5 an event online document that comes from our university  
6 events office in conjunction with scheduled events on  
7 campus.

8 MR. ABRAMS Q: I see. And -- well, looking at  
9 pages 3 to 5, do you see it says UCLA Registered Campus  
10 Organization Event Summary?

11 Do you see that?

12 A Yes.

13 Q Okay. And is that a document that SJP chapter  
14 would have submitted in connection with organizing the  
15 conference?

16 A This is a document that is produced from  
17 information that comes from a portal called Events  
18 Online where the combination of the students and/or the  
19 advisors submit information into the system.

20 MS. STEIN: Is everyone else able to get  
21 David's document? Because I am not.

22 MR. KATON: I can. And I can e-mail it to you  
23 if that would be helpful.

24 MS. STEIN: Sure. That would be great. Thank  
25 you.

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1 MR. ABRAMS: Do you want a few minutes?

2 MS. STEIN: Yes, please.

3 MR. ABRAMS: Okay.

4 MS. STEIN: When I click on "Download," it  
5 takes me to a list of documents and then it doesn't  
6 open. So I don't know -- I don't know what's going on.

7 Glenn, did you just e-mail it to me?

8 MR. KATON: I haven't clicked "Send" yet.  
9 Give me one second. I'm having trouble downloading it  
10 for some reason. I have it in my viewer. Oh, wait. I  
11 apologize. I think I got it now.

12 MS. STEIN: I'll just -- I'll look over Mr.  
13 DeLuca's shoulder, so that's fine.

14 MR. ABRAMS Q: Mr. DeLuca?

15 A Yes.

16 Q So what I'd like to know is, just so we're  
17 clear, who would have prepared pages 3 through 5?

18 A The student organizers who have a role in  
19 completing this. It's what's called the signatories.  
20 When you're a registered campus organization at UCLA,  
21 three students are designated as the signatories.  
22 They're allowed to request things and request things and  
23 schedule things and requests for funding and the like.

24 MR. STEIN: Court Reporter, did you get all  
25 that? Because I didn't understand what he just said.

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1 (Reporter Clarification)

2 MR. ABRAMS Q: Well, let me ask -- I apologize  
3 if you already answered this question, sir. But I would  
4 like to know who would have prepared pages 3 through 5.

5 A In our event and room request process, there's  
6 a role for an organizer. In this case, it would have  
7 been a registered campus organization. Registered  
8 campus organizations are made up of three signatories.

9 Those three signatories then have access to  
10 the online systems of rescheduling space, populating an  
11 event request form, requesting funding.

12 Q And so these three individuals, they're  
13 students?

14 A In the case of this organization, yes. Those  
15 are students.

16 Q Okay. Fine. So turning to the first page.  
17 And it says, "Have you been awarded funding?" And you  
18 see someone checked off "Yes." And you see it says, "We  
19 have outside fundraising and the BEST grant."

20 Do you see that?

21 A I do see that, yes.

22 Q Okay. So is that the -- the grant that you  
23 were testifying about earlier, sir?

24 A Yes.

25 Q Okay. So is it fair to say that some of the



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1 UCLA grant went to funding this conference?

2 A I don't have direct knowledge of exactly what  
3 funds went to what.

4 Q Okay. Well, is it fair to say that to your  
5 understanding as this document -- this document is  
6 representing that?

7 MS. STEIN: Calls for speculation.

8 You can answer if you know.

9 MR. ABRAMS: All right. You know the  
10 problem -- hold on a second. Because the thing is this.  
11 That sort of objection is -- can easily be seen as an  
12 attempt to coach the witness to try to get him to say  
13 the testimony you want him to say.

14 So if you have an objection, you can certainly  
15 make an objection and just say "Objection" if you want  
16 to preserve it. But there's no need to make an  
17 objection as to speculation or something like this at  
18 this time. It really is going to look like you're  
19 trying to coach the witness here.

20 MS. STEIN: Calls for speculation is an  
21 appropriate objection. He didn't prepare the document  
22 and doesn't know what the person who prepared the  
23 document was thinking. So that's why I raised that  
24 objection.

25 MR. ABRAMS: I understand that. But, you

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1 know, it looks to me like you're trying to suggest an  
2 answer to the question. So I'm asking you not to make  
3 this kind of speaking objection.

4 MS. STEIN: I simply indicated calls for  
5 speculation.

6 MR. ABRAMS: I understand that. I mean, I  
7 guess, you know --

8 MS. STEIN: It's not speaking.

9 MR. ABRAMS: Here in New York, that kind of  
10 objection is thought to be completely inappropriate.  
11 Maybe it's okay in California. Ultimately the judge is  
12 going to decide if you keep going down this road,  
13 though.

14 Q Do you have an answer, sir?

15 A Can you repeat your question again?

16 Q Yes. The question is this, sir.

17 To your understanding of this document and how  
18 it's used by UCLA, are the people who prepared the  
19 document representing that University monies, this BEST  
20 grant, were used towards the conference?

21 MS. STEIN: Same objection.

22 Go ahead.

23 THE WITNESS: In this category, knowing how  
24 this form works, they're indicating to the events office  
25 that they believe they have funding sources that would

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1 cover event costs.

2 MR. ABRAMS Q: Okay. And those funding  
3 sources include the BEST grant; correct?

4 A That's what they have listed on this form.

5 Q And the BEST grant comes from the University;  
6 is that right?

7 A The events -- the BEST grant is a  
8 noncompulsory student fee set of funds that came from  
9 the Equity, Diversity and Inclusion office.

10 Q Okay.

11 A It's a student initiated grant process.

12 Q When you say the Equity, Diversity and  
13 Inclusion grant office, that's part of the University;  
14 correct?

15 A Equity, Diversity and Inclusion. And yes.  
16 That is an office of UCLA.

17 Q Okay. Fine. And turning to page 1, do you  
18 recognize page 1?

19 A I do see that, yes.

20 Q Okay. And is that a record that's -- that  
21 you're familiar with, sir?

22 A I have seen that document, yes.

23 Q Okay. And I guess what I'm asking you is  
24 this. Is this a document that you -- a type of document  
25 that you regularly see in the course of your work?

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1 A Not me specifically. It's a document  
2 transmitted to that office, to student organization  
3 office, when they make grants to student organizations.

4 Q I see. And so you see this is the -- purports  
5 to be a grant for Students for Justice in Palestine  
6 funding in the amount of \$8,000.

7 Do you see that?

8 A Yes. I do see that.

9 Q Okay. And is that the grant you were  
10 testifying about earlier?

11 A Yes, it is.

12 Q Okay. Now, in terms of the budgetary amounts,  
13 the amounts there, where you see it says Advertising,  
14 Facilities, Food, Honorarium, Conferences, Supplies and  
15 Transportation, do you see all that?

16 A Yes, I do.

17 Q Okay. And so is it your testimony that you  
18 don't know what those dollar amounts represent and what  
19 those monies were used for?

20 A They're general categories that relate to  
21 University cost centers. Do I know specifically what  
22 amount went through during the 2018-19 year, no, I do  
23 not.

24 Q Okay. Well, based on your general knowledge  
25 from your position, is it fair to say that your

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1 understanding of "honorarium" would mean fees for  
2 speakers?

3 A That is normally what I conclude when I see  
4 that with regard in the funding request.

5 Q Okay. And similarly conferences -- based on  
6 your general knowledge from your position, conferences  
7 would include conferences such as the conference we're  
8 talking about today; correct?

9 A Typically when I see that word, it's normally  
10 related to registration fees for conferences.

11 Q Okay. Well, let me ask you this. You say  
12 "Typically when I see that word."

13 Are you telling me -- are you testifying based  
14 on your general knowledge or do you have any special  
15 knowledge from your position about how those words are  
16 used in this type of document?

17 A My office and I approve hundreds of student  
18 funding requests over the years. So I'm testifying  
19 based on when those come to me for my approval and I see  
20 those general categories of words, that's what I believe  
21 those relate to or stand for.

22 Q Let me ask you this, sir.

23 Are you aware of any other conferences put on  
24 by Students for Justice in Palestine at UCLA for that  
25 year other than the one we're testifying here -- we're

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1 talking about today?

2 A I'm not aware that they hosted any other  
3 conference at UCLA in the 2018-19 school year.

4 Q Okay. And you're not aware of any conferences  
5 they would have hosted anywhere during that year; is  
6 that right?

7 A I don't have independent recollection of that,  
8 no.

9 Q Okay. So that means yes; right?

10 A I'm not --

11 MS. STEIN: Can you repeat the question again?  
12 Vague and ambiguous.

13 MR. ABRAMS: Can you read back my  
14 last question? Not the last one, the one before,  
15 please.

16 (Whereupon the record was read.)

17 MS. STEIN: At any location outside of UCLA?  
18 Is that your question?

19 MR. ABRAMS: Yes.

20 Q Anywhere in the world, sir, are you aware of  
21 any conferences at all?

22 MS. STEIN: Calls for speculation.

23 MR. ABRAMS: I'm just asking about his  
24 knowledge, ma'am.

25 MS. STEIN: Okay.

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1 THE WITNESS: I don't have --

2 MR. ABRAMS: Okay. So --

3 THE WITNESS: -- independent knowledge of any  
4 other conferences that they were involved in in that  
5 year.

6 MR. ABRAMS Q: And similarly in -- you see  
7 this line item, Honorarium.

8 Are you aware of any activities put on by SJP  
9 at UCLA other than the conference we're talking about  
10 that would have entailed Honorarium?

11 A Yes, I am.

12 Q And what's that?

13 A They have a number of programs over the course  
14 of the year, and historically, they have had speakers on  
15 campus.

16 Q Okay. Well, let me ask you this.

17 Turning back to the \$1,600 figure for  
18 conferences, based on your general understanding about  
19 how these things work, is it fair to say that that  
20 \$1,600 would go back -- a lot of it would go back to  
21 UCLA in terms of facilities fees?

22 A Not necessarily, no.

23 Q Okay. But based on your general experience,  
24 what sort of things would that money be spent on?

25 A Well, as I said, typically -- and this does

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1 not -- this letter is awarding them a grant over the  
2 course of the year for their broad-based program called  
3 Palestine Awareness. So I don't know if the word  
4 "conferences" as I previously testified was referencing  
5 registration fees that something they might participate  
6 in or to costs related to hosting something.

7 Q So I don't think you've answered my question,  
8 sir. I'm trying to ask based on your experience what  
9 sort of expenses would such monies be spent on.

10 A In a line item called Conferences?

11 Q Yes, sir.

12 A I guess it could relate to a direct cost  
13 related to a conference.

14 Q Okay. And what sort of cost would that be?

15 A Might have to do, you know, with their event  
16 preparation, could have to do with costs related to  
17 logistics of an event, things of that nature.

18 Q What are some examples of monies that would be  
19 spent on logistics? What sort of things are we talking  
20 about here, sir?

21 A Could be the house staff of the venue, could  
22 be setup and strike costs related to turnover of the  
23 specific venue, things of that nature.

24 Q All right. So, like, it sounds like you,  
25 based on your position, don't really -- aren't really



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1 able to say what those monies would have been spent on;  
2 is that correct?

3 A I guess that -- my answer would be that is  
4 correct. Because no. I do not have direct knowledge of  
5 very specifically to that line item.

6 Q Well, let me ask you this.

7 Who would know how the money was spent?

8 A I'm guessing the student organizers of the  
9 event.

10 Q Well, would any oversight be issued --  
11 exercised by UCLA over how the money was spent?

12 A It would have gone through an account process.  
13 And things would have submitted receipts or items to be  
14 paid, you know, through that funding source.

15 Q I see. And UCLA saves those records; is that  
16 right?

17 A Yes.

18 Q Okay. So those records in UCLA's files, that  
19 would allow us to figure exactly where that \$8,000 went.

20 Is that fair to say?

21 A I would say that would be accurate.

22 Q Let me ask you this, sir.

23 This A-1 exhibit, these are all documents that  
24 were kept in the ordinary course of business by UCLA?

25 A Yes. I would say that is accurate.

MICK DeLUCA

1 Q Okay. And is it fair to say that the -- the  
2 first page was prepared by someone who was an employee  
3 of UCLA; correct?

4 A Yes.

5 Q And the same for the remaining pages?

6 A It looks like the remaining pages would be  
7 downloads from the online system. But to your question  
8 prepared by or submitted by a University employee, yes.

9 Q Okay. And that would have been done in the  
10 ordinary course of their job duties; correct?

11 A Correct.

12 Q Okay.

13 MS. STEIN: And you're talking about the first  
14 two pages, not the -- not the application? Because that  
15 was prepared by students.

16 MR. ABRAMS: The record is what it is. You'll  
17 have a chance to question him at the end if you think  
18 that something was unclear.

19 Q Let me ask you this, sir.

20 Did the people who organized the conference do  
21 anything to set up their own security arrangements?

22 A Student organizations meet with the University  
23 officials. I had indicated that in this case this was  
24 dubbed as a major event under our interim major events  
25 policy. That required a meeting with the UCPD.

MICK DeLUCA

1 Q Okay. Do you happen to know if anyone from  
2 this event took security roles on for themselves?

3 A The students, organizers, had a plan, a  
4 security plan related to their process, clearance of  
5 attendees, room monitoring and the like, yes.

6 Q I see. Let me ask you this.

7 Were these security plans put into writing?

8 A I do not have specific recollection of that,  
9 no.

10 Q Let me ask you this.

11 Was there a meeting in advance of the  
12 conference organized by an --

13 MS. STEIN: You cut off there, David. We  
14 couldn't hear you.

15 MR. ABRAMS Q: What I said was, was there a  
16 meeting set up in advance of the conference by an  
17 organization called SWANA-LA?

18 A I'm not aware of such meeting.

19 Q Okay. Were there any meetings that you're  
20 aware of other than the ones that you've testified about  
21 set up in advance for the conference?

22 A I'm aware of meetings set up by the University  
23 in advance of the conference.

24 Q But none set up by the conference organizers  
25 themselves?

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1 A I'm not aware of the meetings they set up.  
2 I'm aware of the meetings they had with me. And I'm  
3 aware of the meetings that the University held.

4 Q Are you aware of a meeting where individuals  
5 from the National Lawyers Guild were present?

6 A I believe I was in meetings with attorney  
7 interest representing all sides of this. I'm trying to  
8 remember about the National Lawyers Guild. I do know  
9 the green hats were present during the event. I'm just  
10 trying to remember if I was in an advanced meeting with  
11 them prior to the event.

12 Q Please take your time and think.

13 A I'm going to answer your question that no, I  
14 don't believe I was in a meeting, advanced meeting with  
15 the National Lawyers Guild, to my belief.

16 Q Okay. Well, let me ask you this. You said  
17 something about green hats.

18 What is -- is that some organization?

19 A When the National Lawyers Guild makes notice  
20 they're going to be on campus related to free speech  
21 event, typically those are attorneys or law students  
22 wear green hats. I don't know if that's a formal  
23 acknowledgement. But we're aware of the green hats when  
24 we have events and there is concern about speech rights.

25 Q Well, let me ask you this, sir.

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1           In connection with this event at any time, did  
2 you meet with any of these green hats?

3           A           Met with them in person. I can specifically  
4 remember day two of the conference meeting -- not  
5 meeting with them but meeting or having a casual  
6 conversation with green hats that appeared to be law  
7 students from surrounding universities. So it was day  
8 two of the conference event.

9           Q           I see. And are you able to summarize the  
10 substance of that conversation?

11          A           Very casual conversation, more of a hello.  
12 And I remember somebody describing to me they were a law  
13 student at another university.

14          Q           Okay.

15          A           I don't remember the content, nothing of the  
16 like. It was more of just a casual conversation because  
17 we were both in the vicinity of a venue.

18          Q           Okay. Well, did you have any substantive  
19 conversations with any of these National Lawyers Guild  
20 people regarding the conference at any time?

21          A           I would not use the word "substantive," no.

22          Q           Okay.

23          A           No. I did not have a substantive  
24 conversation.

25          Q           Well, let me ask you this.

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1                   What about have you heard of an organization  
2 called Jewish Voice for Peace?

3   A               Yes.

4   Q               And same question. Did you have any meetings  
5 with anyone from Jewish Voice for Peace, substantive  
6 regarding a conference?

7   A               No advanced meeting that I'm aware of. I met  
8 individuals that indicated they were from Jewish Voice  
9 for Peace during the conference --

10   Q              Okay. Hold on just a second. Well, let me  
11 ask you this, sir.

12                   Besides the BEST grant we've discussed, what,  
13 if anything, did the University do to support the  
14 conference?

15   A               The University works with all of our student  
16 organizations on things called time, place and manner  
17 and logistics. So those were all executed, in this case  
18 working with both the organizers, student organizers for  
19 the event, and in coordination with the various offices  
20 on campus.

21   Q               Let me ask you this.

22                   If someone organizes a conference at UCLA, if  
23 a student group organizes a conference, do they have to  
24 pay for use of space?

25   A               Depends on the nature of their organization.

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1 In most of the spaces on campus, there would be no fee  
2 for student organizations. Some of the auditoriums on  
3 campus, they would pay a student rental fee or an  
4 equivalent department rental fee versus what would be an  
5 outside venue rental fee.

6 Q Okay. In this case, did the conference  
7 organizers pay any fee to UCLA for use of space?

8 A To my knowledge, they did not. Because as a  
9 registered campus organization --

10 MS. STEIN: You answered the question.

11 MR. ABRAMS Q: So what were you about to say?  
12 As a registered campus organization?

13 A A registered student organization, based on  
14 the venues they use would not pay a facility use fee.

15 Q Okay. Let me ask you this. We've talked  
16 about security a little bit.

17 Did the University assign security people to  
18 this event?

19 A The event was dubbed a major event under our  
20 major event policy that --

21 (Reporter Clarification)

22 THE WITNESS: Mr. Abrams, could you just  
23 repeat that question again?

24 MR. ABRAMS: The court reporter can repeat the  
25 question if you don't mind, ma'am.

MICK DeLUCA

1 (Whereupon the record was read.)

2 THE WITNESS: Yes, they did.

3 MR. ABRAMS Q: Okay. And I think you started  
4 to say before we had audio problems that this was deemed  
5 to be a major event, and, therefore, the cost of  
6 additional security were absorbed by the University.

7 Is that what you were testifying to?

8 A Under a major events policy for student  
9 organizations, in the protection of free speech, the  
10 cost of safety services related to relying points of  
11 view to be expressed and safe policies on campus are  
12 absorbed by the University.

13 Q Okay. And is it fair to say that more -- in a  
14 typical major event, more is spent on security than  
15 would be spent if there was no event?

16 A Yes. That would be fair to say.

17 Q Okay. Do you know if the University supplied  
18 food to this event or if the organizers paid for their  
19 own food?

20 A The organizers paid for their own food.

21 Q Okay. So aside from space and security, did  
22 the University provide any other services in connection  
23 with this event?

24 A I'm just pausing, reflecting on the term  
25 "services." Any event at UCLA requires a coordination



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1 of a variety of services. So was there coordination for  
2 parking on campus, yes, there was. That was paid for.  
3 Was there coordination with transportation on campus,  
4 yes, there was. Because individuals were coming to  
5 campus. I'm trying to think through.

6 We had to coordinate with our facilities  
7 division, as it required moving some bicycle barricades  
8 at various locations on campus.

9 And then as I indicated before, there was  
10 coordination with UCPD.

11 Q All right. Well, I'm a little confused.

12 Does it normally -- when you say  
13 "transportation," what exactly do you mean?

14 A Transportation controls all the parking and  
15 arteries on the campus, if anybody needs a special  
16 drop-off location on campus; if a group anticipates  
17 media might be coming, transportation has to designate a  
18 location for media on campus.

19 So it's a very common practice in the course  
20 of business of larger events on campus at UCLA where we  
21 coordinate all those variety of services when we have  
22 events on campus.

23 Q I mean, would transportation include -- that  
24 would not include shuttling conference attendees around,  
25 would it?

MICK DeLUCA

1 A No. Well, if they were to request that.

2 There was no request of that in this case. In other  
3 cases, it involves shuttle buses, drop-offs on campus,  
4 et cetera.

5 Q I see. And when you say "parking," is parking  
6 not free on the campus?

7 A No, it is not.

8 Q I see. So if someone has a conference, is it  
9 fair to say that they get some kind of parking voucher  
10 or parking validation?

11 A They either prepurchase parking and then  
12 individuals are on a pass list, or they provide a gate  
13 list, and individuals come to one of the parking kiosks  
14 and pay for their own parking.

15 Q I see. So parking wouldn't be considered a  
16 freebie for a conference like this.

17 Is that fair to say?

18 A Correct.

19 Q Okay. So the transportation services you're  
20 talking about are more about than -- at least in this  
21 case more about coordination than moving people around  
22 or giving them parking; is that right?

23 A Transportation also controls the roads on the  
24 campus. When we anticipate there could be a protest or  
25 a disturbance, we might coordinate with them on closing

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1 a road.

2 Q I see. Well, just give me a second. So  
3 turning back to A-1, sir.

4 A Yes.

5 Q Okay. And I apologize. I'm still a little  
6 confused by this document. There's, like, three pages,  
7 pages 3, 4 and 5. Either you cut out a little bit when  
8 you were explaining it to me and I just want to  
9 understand -- well, let me ask you this.

10 It says SOLE advisor, S-O-L-E. Do you know  
11 what SOLE stands for?

12 A Yes. I described it originally, Student  
13 Organizations, Leadership and Engagement. That's an  
14 office of -- the SOLE office.

15 Q And RCO stands for?

16 A Registered Campus Organization.

17 Q I see. Okay. And so let me ask you this.

18 Just so we're clear, this document is a  
19 computer form that someone can download and type  
20 information into; is that right?

21 A Well, I'm reading from the title of this form  
22 on the top of page 3. So this is the summary document  
23 that came from an online system where individuals input  
24 the various fields that you see on the form.

25 Q And in the ordinary course of things, who

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1 would be inputting this information?

2 A In this case, it would have been the students  
3 would have been provided access. And then the form gets  
4 routed by, it would have been passed through their SOLE,  
5 their student organization advisor.

6 And then it would have also gone to -- to the  
7 events office and who would have been a designated event  
8 manager for a student event.

9 Q I see. So would the SOLE advisor review this  
10 document in the ordinary course of things before sending  
11 it on?

12 A The students input the information themselves,  
13 goes to the events office that then routes it to their  
14 advisor. So the advisor would have seen it at that  
15 point.

16 Q Okay. Would that -- and is it the advisor's  
17 responsibility to send the document on to the next step?

18 A I think the advisor clicks what the student  
19 has as accurate information.

20 Q And so -- so that means yes.

21 The -- if I understand your testimony  
22 correctly, sir, you say in the ordinary course of things  
23 students would fill that information into the form, and  
24 then it would be sent electronically to the SOLE  
25 advisor. The advisor has to check -- click a button

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1 saying that it's accurate, and then it gets sent on to  
2 the next step.

3 Is that a fair summary of your testimony?

4 A I'd say yes, that's a fair summary.

5 Q Okay. And an advisor would be assigned to  
6 more than one registered campus organization typically.

7 Is that fair to say?

8 A Yes, it is.

9 Q Okay. And the assignments, are they done  
10 based on the advisor's interest in the organization or  
11 is it done some other way?

12 A They're not done by interest at all. We have  
13 1,450 organizations. Each advisor typically has 150 to  
14 300 groups they advise over the course of the year.

15 Q I see.

16 A Some are grouped together in categories. But  
17 it's not about any special relationship or special  
18 interest other than that advisor.

19 Q I see. So in this case, there's no reason to  
20 believe that the advisor has any particular opinion  
21 about the issues that SJP is active on.

22 Is that fair to say?

23 A That would be very fair to say.

24 Q Okay. But you won't tell me who the advisor  
25 is? Is that --

MICK DeLUCA

1 A No, I will not.

2 Q Let me ask you this.

3 Was this conference treated differently than  
4 other conferences, other major events as you use the  
5 word, or was it basically treated in the same way?

6 A Treated exactly the same as any other event.

7 Q I see. So your testimony is that there are no  
8 special accommodations made for this conference; is that  
9 right?

10 MS. STEIN: Vague and ambiguous as to "special  
11 accommodations."

12 You can answer.

13 THE WITNESS: There was no special treatment  
14 related to this conference. It was handled exactly the  
15 same way we'd handled hundreds of conferences, events,  
16 speakers, concerts that our student organizations have  
17 on campus.

18 MR. ABRAMS Q: Let me ask you this.

19 Have you heard of this conference being  
20 referred to as a, quote, "closed-door event"?

21 A Yes, I have.

22 Q Okay. And what does "closed-door event" mean  
23 to you?

24 A That the organizers decide to restrict  
25 attendance to a certain membership category or other

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1 category that was at their discretion.

2 Q I see. And is that -- does that happen  
3 regularly in terms of events at UCLA?

4 A I would indicate we have many events that only  
5 have an invited or restricted audience, yes.

6 Q Okay. So it's -- it's a regular occurrence to  
7 have closed-door events at UCLA; is that right?

8 A There are closed-door events held at UCLA;  
9 correct.

10 MR. ABRAMS: Okay. So I'm very close to the  
11 end of my questions. I just need a short break to check  
12 over my notes. So if we could take, let's say, ten  
13 minutes and then resume.

14 Is that okay with everyone?

15 MS. STEIN: That's fine.

16 MR. KATON: Yes.

17 MR. ABRAMS: So I'm going to come back at 1:45  
18 New York time, which I guess is 10:45 in California.

19 (Whereupon a recess was taken.)

20 MR. ABRAMS Q: So, Mr. DeLuca, having had the  
21 opportunity to take a break, is there anything in your  
22 earlier testimony that you'd like to correct or change?

23 A Not at this point, no.

24 Q Okay. Fine. Did you discuss your testimony  
25 with anyone while we were on break?

MICK DeLUCA

1 MS. STEIN: Besides myself, attorney-client  
2 privilege communication, you can answer.

3 THE WITNESS: No, I did not.

4 MR. ABRAMS Q: I'm not asking for you to  
5 disclose anything that was said between you and your  
6 legal counsel, but I am entitled to know if you had a  
7 conversation with her.

8 A The University attorney is in the room with  
9 me, and we had a casual conversation at our break.

10 MR. ABRAMS: Okay. Fine. So let me ask you  
11 this, sir. I'm going to try to send another document in  
12 the system, so we'll see how that goes. And I guess  
13 we'll call this one A-2.

14 (Whereupon Plaintiff's [Exhibit A-2](#)  
15 was marked for identification.)

16 MR. ABRAMS Q: Let me ask you this.  
17 When did you first hear my name?

18 A I think in the last year possibly. I guess  
19 after you had, you know, filed a suit related to this.

20 Q Okay. Did you hear my name before the  
21 conference?

22 A No. I don't have memory of hearing your name  
23 before the conference.

24 Q Well, let me ask you this.

25 At some point did you send a list of the



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1 conference speakers and presenters to campus security?

2 A Yes, I did.

3 Q And why did you do that?

4 A Why did I send the list? Because with any  
5 major event planning, I met with the student organizers,  
6 made them aware of the fact, and they were well-aware of  
7 the fact, that there was lots of scrutiny, suggestions  
8 of what was going on.

9 We also had concerns of if somebody was coming  
10 to campus and there would be threats against the  
11 University, I asked if they would forward the names to  
12 me. And what I would do with those names would be to  
13 forward them through our police department for security  
14 checks.

15 Q And is that standard practice for a campus  
16 event or is it something that was only done for this  
17 event?

18 A I've done it numerous times with speakers,  
19 with concerts, artists. So I would say it's practice  
20 for events of this profile or nature.

21 Q I see. And in situations like this -- well,  
22 let me see if I can share a file. Okay? And I  
23 apologize if I didn't do it right. It should be up  
24 coming through.

25 A I'm trying to download it. Okay. Yes.

MICK DeLUCA

1 Q So I'm going to ask you, is this an e-mail  
2 that you sent on or about November the 7th, 2018?

3 A Yes, it is.

4 Q Okay. And so who are Tony and Bob?

5 A Tony is chief of UCPD, Chief Tony Lee. Bob is  
6 Captain Robert Leinweber.

7 Q So is it fair to say that you shared the list  
8 of names of presenters with these individuals?

9 A Yes, it is.

10 Q Okay. And was there anyone else you shared it  
11 with or was it just them?

12 A It was just them.

13 Q Okay. And now you see that your e-mail seems  
14 to contain an e-mail that appears to be from someone  
15 affiliated with the conference.

16 Is that fair to say?

17 A Yes, it does.

18 Q Okay. And who is Jake Gildea?

19 A Jake is a staff member at UCLA.

20 Q Okay. And what is Jake's job?

21 A Jake works with university organizations.

22 Q Is he one of these people that you would call  
23 a SOLE advisor?

24 A Yes, he is.

25 Q Okay. So let me ask you this. I'm just a

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1 little confused here.

2 Because that's -- that's the guy whose name  
3 you wouldn't tell me; right?

4 A I wouldn't specifically give you the name when  
5 you asked the question; that is correct.

6 Q Well, I'm just confused, because you see it.  
7 It's right there in black and white. It wasn't  
8 redacted. You know, is there some reason I should be  
9 aware of why this name should be considered  
10 confidential? I mean, I'll certainly consider if  
11 there's a good reason.

12 A At the time when you asked me the question, I  
13 indicated I wouldn't release it because the staff member  
14 had requested his name not be released for fear of  
15 harassment and threats.

16 Q Okay. Let me ask you this.  
17 To your knowledge, has this individual  
18 received any harassment or threats? To your knowledge.

19 A To my knowledge, yes, he has.

20 Q Okay. And when did that happen?

21 A During the course and the time of the  
22 conference date.

23 Q I'm sorry?

24 A During the course and the timeframe of the  
25 conference date.

MICK DeLUCA

1 Q Okay. Since then?

2 A I'm not specifically aware of that, no.

3 Q Okay. Do you know if he filed a police report  
4 over these threats of harassment?

5 A I'm not aware if he did.

6 Q Okay. Well, let me ask you this.

7 You see that the conversation to you and Mr.  
8 Gildea makes reference to an apparent meeting that you  
9 had apparently with the conference organizers.

10 Do you see that?

11 A Let me just cite that specific area. "Thank  
12 you for meeting with us last week." Yes, I do see that.

13 Q Okay. So does looking at this document  
14 refresh your recollection about your meetings with the  
15 organizers of the conference?

16 A Yes, it does.

17 Q Okay. So having had your recollection  
18 refreshed, is there anything else in substance about the  
19 meeting that you can tell me happened?

20 A I met with the student organizers, who were  
21 our own students on campus. I checked in on their own  
22 wellbeing and how they were doing at that time of the  
23 year. It was a very similar timeframe to where we are  
24 right now, which involves midterms and a fast-paced  
25 quarter.

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1           We talked about the logistics and planning.  
2 They were well-aware of a number of news articles and  
3 things that were happening and discussed the importance  
4 related to the safety of all participants and for them  
5 on campus. So that is my recollection today.

6 Q           Okay. And I'm sorry. I just lost you there  
7 for a few minutes. I don't know if anything was said.

8           MS. STEIN: No.

9           THE WITNESS: I didn't say anything after your  
10 last question.

11           MR. ABRAMS Q: Yeah. I guess it might be my  
12 fault. But anyway, so let me ask you this.

13                   Between the meeting described in this e-mail  
14 and the conference itself, did you have any other  
15 meetings with the conference organizers?

16 A           I believe I had a meeting the day before the  
17 conference at the site of the first night's venue.

18 Q           Okay. And can you tell me the substance of  
19 those meetings, what was discussed and what was said?

20 A           Those were purely logistical discussions  
21 related about the entry and the exit to the venue,  
22 refreshing my memory of what their check-in system was  
23 going to be, whether they were using wristbands or the  
24 likes, asked them if they had any other concerns or  
25 safety issues that they were aware of for themselves.

MICK DeLUCA

1 I think we reflected earlier that week a group  
2 had come to campus and protested. So logistical kind of  
3 items related in advance to open the conference.

4 Q Well, let me ask you this.

5 And is that more or less a full and complete  
6 summary of these meetings?

7 A To the best of my memory at this moment, yes.

8 Q Okay. And let me ask you this.

9 This e-mail that you're forwarding in day two  
10 I'm calling, did you respond to that e-mail? Did you --  
11 excuse me. Did you reply to that e-mail?

12 A No, I did not.

13 MR. ABRAMS: Okay. I don't have any more  
14 questions for this witness.

15 Cross-examination?

16 MS. STEIN: I don't have any questions. Thank  
17 you.

18 MR. ABRAMS: Okay.

19 MR. KATON: No questions here.

20 MR. ABRAMS: Thank you. So the thing is, I  
21 guess there may be an issue whether the document  
22 requests in this matter were fully complied with, so I'm  
23 reserving that issue in terms of closing this  
24 deposition. But I have nothing further at this time.  
25 So that's all. Disconnecting.

MICK DeLUCA

1 MS. STEIN: Do you want me to do the  
2 stipulation that we normally do in California or in  
3 southern California?

4 MR. ABRAMS: You know, you can e-mail me any  
5 stipulation, and I'm happy to consider it in good faith.  
6 You know, obviously I'm just a pro-state guy. I don't  
7 know a thing about California stipulations.

8 We're off the record; right?

9 MS. STEIN: I see the court reporter is  
10 shaking her head.

11 What does that mean?

12 (Off-the-record discussion.)

13 MS. STEIN: Well, we have to reach a  
14 stipulation on the record.

15 MR. ABRAMS: What are you proposing, then?

16 MS. STEIN: I propose we relieve the court  
17 reporter of her duties under the code. The reporter can  
18 prepare and send the original transcript to my office.  
19 I will then present it to the witness for his review.

20 The witness will review, sign under penalty of  
21 perjury and return the same back to my office within 30  
22 days.

23 I will then notify you if there are any  
24 changes within a week. And I can maintain custody of  
25 the original and produce it upon -- produce it at trial

MICK DeLUCA

1 if need be.

2 MR. ABRAMS: That's fine. I'm going to get an  
3 e-mail copy; right?

4 (Off-the-record discussion.)

5 MS. STEIN: So did you get the stipulation on  
6 the record already when I had read in the record  
7 previously?

8 MR. ABRAMS: Just say it again so I  
9 understand.

10 MS. STEIN: I just say that's the stipulation.  
11 And then, Mr. Abrams, if you agree, you say, "So  
12 stipulated."

13 MR. ABRAMS: So if I understand things, the  
14 original will be sent to you. Someone is going to send  
15 me a copy, either you or the court reporter. I'm going  
16 to pay them.

17 You'll present the original to your client for  
18 signature. You'll maintain -- and then once it's  
19 signed, I assume I'll get a copy of the signed version.

20 And then you'll present it to the Court if  
21 need be at trial; is that right?

22 MS. STEIN: Yes; that's correct.

23 MR. ABRAMS: Okay. That's fine.

24 MS. STEIN: Yes.

25 MR. ABRAMS: Thank you.



**MICK DeLUCA**

1                   MS. STEIN: Thank you.

2                   MR. KATON: We'd like to order a copy as well.

3 Thank you.

4                   (Whereupon the proceedings

5                   were concluded at 11:02 a.m.)

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MICK DeLUCA

1 CASE: Abrams vs. Regents of the University of  
2 California

3 DATE: November 12, 2020  
4

5 I hereby declare under penalty of perjury that  
6 I have read my deposition transcript, made the changes  
7 and corrections that I deem necessary, and approve the  
8 same as now true and correct. I hereby state there are:

9 (Check one)

10 \_\_\_\_\_ NO CORRECTIONS

11

12 \_\_\_\_\_ CORRECTIONS ATTACHED

13

14

\_\_\_\_\_ MICK DeLUCA

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\_\_\_\_\_ DATE SIGNED

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DEPONENT'S CHANGES OR CORRECTIONS

DEPONENT: MICK DeLUCA  
CASE: Abrams vs. Regents of the University of California  
Job No: 20-9446kg  
Date of Deposition: November 12, 2020

NOTE: If you are adding to your testimony, print the exact words you want to add. If you are deleting from your testimony, print the exact words you want to delete. Specify with "add" or "delete" and sign this form.

PAGE	LINE	CHANGE/ADD/DELETE
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I hereby certify that I have read my deposition transcript, made those changes and corrections that I deem necessary, and approve the same as now true and correct.

Deponent's Signature: \_\_\_\_\_ Date \_\_\_\_\_

CERTIFICATE OF CERTIFIED SHORTHAND REPORTER

I, KENDRA L. GILLIE, a Certified Shorthand Reporter, licensed by the State of California, being empowered to administer oaths and affirmations pursuant to Section 2093(b) of the Code of Civil Procedure, do hereby certify:

That the witness named in the foregoing deposition appeared remotely before me;

That the witness was by me sworn to testify the truth, the whole truth and nothing but the truth;

That the said proceeding was taken before me in shorthand writing, and was thereafter transcribed, under my direction, by computer-assisted transcription;

That the foregoing transcript constitutes a full, true and correct record of the proceedings which then and there took place;

That I am a disinterested person to the said action;

IN WITNESS WHEREOF, I have hereunto subscribed my signature on this 30th day of November, 2020



KENDRA L. GILLIE, CSR #9643

L.J. HART & ASSOCIATES, INC.  
BARRON & RICH  
Certified Shorthand Reporters  
1900 Point West Way, Suite 277  
Sacramento, California 95815  
916.922.9001 fax: 916.922.3461

November 30, 2020

Job No. 20-9446kg

MICK DeLUCA  
C/O SHIVA STEIN, Attorney at Law  
1525 Faraday Avenue, Suite 300  
Carlsbad, California 92008-7372

--o0o--

Re: Abrams vs. Regents of the University of California  
Date taken: November 12, 2020

--o0o

Dear Mr. DeLuca:

Your deposition in the above matter is now available.  
You can read, correct and sign for 30  
days from the date of this letter. You may wish to  
discuss with your attorney whether he/she requires that  
it be read, corrected, if necessary, and signed.

If you do not desire to read your deposition and wish to  
waive signature, please sign your name and date below,  
and return this letter to our office.

\_\_\_\_\_  
SIGNATURE

\_\_\_\_\_  
DATE

Sincerely,

L.J. HART & ASSOCIATES, INC.  
BARRON & RICH  
Certified Shorthand Reporters

cc: DAVID ABRAMS                      JAVERIA JAMIL  
SHIVA STEIN                            ZOHA KHALILI-ARAGHI  
GLENN MICHAEL KATON

L.J. HART & ASSOCIATES, INC.  
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1900 Point West Way, Suite 277  
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916.922.9001 fax: 916.922.3461

Job No. 20-9446kg

DAVID ABRAMS, Attorney at Law  
305 Broadway, Suite 601  
New York, New York 10007

--o0o

Re: Abrams vs. Regents of the University of California  
Deposition of: MICK DeLUCA  
Date taken: November 12, 2020

--o0o

Dear Mr. Abrams:

We wish to inform you of the disposition of this original transcript. The following procedure is being taken by our office.

\_\_\_\_\_ The witness has read and signed the deposition. (See attached.)

\_\_\_\_\_ The witness has waived signature.

\_\_\_\_\_ The time for reading and signing has expired.

\_\_\_\_\_ The sealed original deposition is being forwarded to your office.

\_\_\_\_\_ Other.

Sincerely,

L.J. HART & ASSOCIATES, INC.  
BARRON & RICH  
Certified Shorthand Reporters

cc: SHIVA STEIN  
GLENN MICHAEL KATON  
JAVERIA JAMIL  
ZOHA KHALILI-ARAGHI

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DEPONENT'S CHANGES OR CORRECTIONS

DEPONENT: MICK DeLUCA  
CASE: Abrams vs. Regents of the University of California  
Job No: 20-9446kg  
Date of Deposition: November 12, 2020

NOTE: If you are adding to your testimony, print the exact words you want to add. If you are deleting from your testimony, print the exact words you want to delete. Specify with "add" or "delete" and sign this form.

PAGE	LINE	CHANGE/ADD/DELETE
<u>11</u>	<u>17</u>	<u>change intern to interest</u>
<u>12</u>	<u>25</u>	<u>change interfaith to interim major events</u>
<u>29</u>	<u>4</u>	<u>delete one of "in"</u>
<u>38</u>	<u>10</u>	<u>change relying to competing</u>
<u>38</u>	<u>11</u>	<u>change safe policies to safety practices</u>
<u>47</u>	<u>9</u>	<u>delete "of"</u>
_____	_____	_____
_____	_____	_____
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_____	_____	_____

I hereby certify that I have read my deposition transcript, made those changes and corrections that I deem necessary, and approve the same as now true and correct.

Deponent's Signature:  Date 12-12-2020



MICK DELUCA

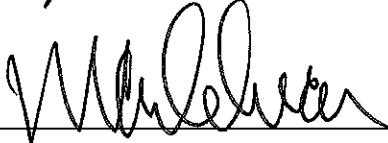
1 CASE: Abrams vs. Regents of the University of  
2 California

3 DATE: November 12, 2020  
4

5 I hereby declare under penalty of perjury that  
6 I have read my deposition transcript, made the changes  
7 and corrections that I deem necessary, and approve the  
8 same as now true and correct. I hereby state there are:  
9 (Check one)

10 \_\_\_\_\_ NO CORRECTIONS

11  
12 X \_\_\_\_\_ CORRECTIONS ATTACHED

13  
14  \_\_\_\_\_

15 MICK DeLUCA

16  
17 12-12-2020

18 DATE SIGNED

19  
20 --oOo--

21  
22  
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25

# Exhibit A-1

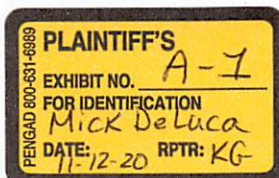
The Office of Equity, Diversity and Inclusion is pleased to provide the Students for Justice in Palestine funding in the amount of \$8,000.00 for their project “Palestine Awareness” within the Bruin Excellence & Student Transformation (BEST) Grant Program, to be used this fiscal year (2018-2019) as follows:

Students for Justice in Palestine	
Category	Amount
Advertising	\$170
Facilities	\$0
Food	\$250
Honorarium	\$4,300
Conferences	\$1,600
Supplies	\$50
Transportation	\$1,300
Other:	\$330
<b>TOTAL</b>	<b>\$8,000</b>

These funds will be administered on your behalf by Student Organizations, Leadership and Engagement (SOLE). To access them, please contact Juan Robles ([jroblesvegas@saonet.ucla.edu](mailto:jroblesvegas@saonet.ucla.edu)) and cc your SOLE Advisor, referencing award # TOF 032948. When submitting the request to access your funds, please be sure to include a copy of this award notification.

Please note that all payments will be made directly to vendors; students will be reimbursed on an exception-only basis and only if approval is granted by Janis Guzman in writing in advance of the expense being incurred.

The deadline to access funds is May 31, 2019. At the end of Fiscal Year 2018-2019, all unused funds will be returned to the funding pool.



UNIVERSITY OF CALIFORNIA - LOS ANGELES  
Transfer Of Funds

Prepared By: KUSUMI, RANDI C.      Effective Date: 09/01/2018      Type Entry: 14      Wip No: 2329892      Status: PROCESSED  
Phone: 3108253935      Trans No: 032948      Dept: 4 - 3008 - OFC OF VC EQUITY DIVERSITY & INCLUSION

Explanation: FY 2018-2019: AS PER EMAIL CONFIRMATION FROM BEST LEADERSHIP TEAM 9/27/18, TRANSFERRING FUNDS TO SOLE IN SUPPORT OF THE BRUIN EXCELLENCE & STUDENT TRANSFORMATION (BEST) GRANT PROGRAM. FUNDS TO BE DISTRIBUTED TO AFRIKAN STUDENT UNION (\$8000); STUDENTS FOR JUSTICE IN PALESTINE (\$8000); AND ASIAN PACIFIC COALITION (\$1860.07) . ANY REMAINING FUNDS LEFT AT THE END OF THE FISCAL YEAR TO BE RETURNED TO EDI.

**Chancellor's Office Use Only**

File:		Commitment Id:				Allocation Code:				
Loc	Account	CC	Fund	Project	Sub	Obj	Source	Description	Temp Debit	Temp Credit
4	683057		19900		05	0000		EDI BEST GRANT		17,860.07
4	660161		19900	BEST	08	0000		EDI BEST GRANT	17,860.07	
<b>Totals:</b>									<b>17,860.07</b>	<b>17,860.07</b>



1 – Event Producer

Students for Justice in Palestine

Name of Registered [Redacted]

Event contact [Redacted]

Phone number: \_\_\_\_\_ Email: \_\_\_\_\_

\*If above contact name is not an RCO signatory, enter **name and email** of signatory that is responsible for event budget approval:

Signatory Name : \_\_\_\_\_ Email: \_\_\_\_\_

Have you spoken with your SOLE advisor about this event?  Yes  No

If no, Please set up a meeting and discuss this proposed event with your advisor PRIOR to submitting form to the Events Office.

Name of your RCO's designated SOLE advisor: [Redacted]

2 – Event Information

You must schedule the location of the event PRIOR to making any event arrangements or speaking with an Events Office event manager.

Have you scheduled the location?  Yes  No Date(s) of event: Nov 17-18 (Sat + Sun)

Name of event: Students for Justice in Palestine National Conference

Number of Attendees : 400-450

All location(s): Dodd hall; Haines hall; Dickson Court North

Set up time: from 7:00AM to 8:00AM

Event time: from 8:00AM to 4:00 PM

Strike time: from 4:00 to 5:00

3 – Event Costs and Funding

Please identify the funding sources you will be using to pay for event costs (student group check, CPC Funds, CAC Funds, BOD funds, etc.):

Have you applied for these funds?  Yes  No  Not Applicable

Have you been awarded funding?  Yes  No  Not Applicable

We have outside fundraising and the BEST grant. We will be applying to CPC and Campus Life.

4 – Room Openings and AV Services

If this event is on a weekend, there will be a charge to open the building, rooms and nearest restrooms for your event location. There is an additional charge to open additional rooms and buildings. Custodian services may be ordered to clean and maintain these restrooms depending on the size and day of your event.

Do you need a General Assignment Weekend Classroom Room opening for this event?  Yes  No  
If "No", skip to section 5

Please list all building rooms you have scheduled and will use for this event:

Dodd: 78, 154, 161, 162, 167, 170, 178; Haines 118

If the opening and closing time is different from the even time entered above, please specify:

Room Opening Time: 9:00AM Room Closing Time: Sat: 4:30PM; Sun: 12:00 PM

Do you need data projector activation or microphones for any of the rooms? If yes, specify what services and the room number:

All 8 rooms listed will need a projector.

## 5 – Table, Chairs, Tents and Miscellaneous Rentals

All rental items must be arranged through the UCLA Events Office. If we do not have the equipment in our in-house inventory we will rent the equipment from a vendor of our choosing. The cost of all rentals will be the responsibility of the RCO.

Do you need any basic seating, tabling, tenting or other rentals for this event?  Yes  No If "No", skip to section 6

### SAFETY ALERT

Tables, tents or chairs cannot impede access to emergency entrances, exits or fire lanes. All event equipment setups require the submission of an event setup diagram to Steve Jurado, Asst. Fire Marshal ([Jurado@ehs.ucla.edu](mailto:Jurado@ehs.ucla.edu)).

Please print out an appropriate blank venue diagram available at <http://map.ais.ucla.edu/go/1002580> and illustrate your desired event set up. An Events Office manager can review the diagram prior to submission to the Fire Marshal's office.

Please indicate the quantities of non-technical (i.e., does not require electric power) equipment you need set up at this event. If you do not need an item, leave blank or write 0. You may be directed by an Event Manager to order your equipment directly from our website at [uclaevents.com](http://uclaevents.com).

# Chairs: 450 # Banquet (rectangular) tables: 4 # Round tables: 58 # Umbrellas: \_\_\_\_\_

# Table linens (any tables used for food require linens or a table covering): \_\_\_\_\_ # 10' x 10' tents: \_\_\_\_\_

Other tents (specify quantity and size): \_\_\_\_\_

Other types of non-technical equipment you would like to have: (staging, porta potties, barricades, chain and stanchions, etc.)

Trash cans, coolers for beverages

Is there any equipment you will be bringing to your event? If so, list:

Only RCO-owned or donated equipment may be used. All other equipment rentals must be processed through Events Office.

## 6 – Food

Any event that has food requires trash boxes, compost containers, or recycling clear streams to be ordered and provided by UCLA Facilities. The cost of this is the responsibility of the RCO.

Will there be food served at this event?  Yes  No If "No", skip to section 7

### SAFETY ALERT

Serving food improperly poses a risk of food poisoning, and your group is solely liable. Please contact the Environmental, Health and Safety Program Manager, Jennie Wung, at [jwung@ehs.ucla.edu](mailto:jwung@ehs.ucla.edu) or (310) 206-4635 (office) regarding rules and regulations. You or your food provider may need a health permit to serve food.

Will food be sold or provided for free to event guests?  Sold  Provided, free

Who is preparing and providing the food (name of caterer or restaurant)?

Zankou Chicken, Green Olive Mediterranean Cuisine, Cafe Dahab

What is being served? Shawarma, Kabobs, Falafel, Rice, Salad, Hummus, Garlic Sauce, Bread, Knafe, Coffee, Water, Soda

Will it be already prepared or cooked on site? Already prepared

When prepared, will any heat source be used to keep the food warm? Yes; Chafing Dishes

## 7 – Parking

Please estimate the total amount of personal vehicles that will be arriving on campus to park for this event (guests, staff, volunteers, etc.):

up to 20  
If your RCO intends to pay for parking permits for any of the above vehicles, please indicate the number of permits and when the vehicles will arrive:

0 Does this event involve any bus drop off, pickup and staging?  Yes  No

If you answered yes to the above, you must make bus coordination arrangements with the UCLA Special Events Parking office at (310) 825-1286.

## 8 – Outdoor Sound or Performances

*Any outdoor amplified sound must be approved by the Center for Student Programming.*

Does this event require outdoor amplified sound of any type?  Yes  No If "No", skip to section 9

Has your SOLE advisor approved the amplified sound?  Yes  No

Please describe the amplified sound (e.g., speaking only, live musical performers, live DJ, pre-recorded music):

If there is live performed music intended at the event, please provide details (e.g., number of performers or bands, instruments, technical requirements):

Do you need Events Office to arrange for the rental of a sound system/PA?  Yes  No

If "No," please indicate where you are getting your sound system: \_\_\_\_\_

If "Yes," please provide detail (e.g., number of microphones, speakers, and/or number of performers or bands and their technical requirements):

*Only RCO-owned or donated equipment may be used. All other equipment rentals must be processed through Events Office.*

## 9 – Power

*Power must be provided by UCLA Facilities electricians and will cost a minimum of \$100. Price depends on the degree of power need and the outlet availability at event location.*

Will your event need any outdoor power supply?  Yes  No If "No", skip to section 10

If yes, please list types of equipment that require electrical power and the quantity of each:

## 10 – Vendors

*ASUCLA has the exclusive right to sell food or merchandise on the UCLA campus. If you have any sales taking place at your event, it must be approved in advance by ASUCLA.*

Do you plan to have vendors selling at your event (e.g., food, merchandise)?  Yes  No If "No", skip to section 11

*If you would like to have vendors at your event, on a separate sheet please indicate the kind of vendors, what they will be selling, what equipment they will be bringing and what additional equipment (tents, tables) you might need to support their activities.*

### SAFETY ALERT

*The UCLA Campus is not immune to crime. Cash handling at an event poses risks of theft or worse. If any money sales occur at your event, a UCPD officer or CSC security guard may be required to be on-site for your event. The cost of this is the responsibility of the RCO.*

## 11 – Ticketing

*Per UCLA Policy, the Central Ticket Office must handle all ticketing arrangements for any campus event regardless of location, size or scope.*

Do you plan to sell or give away tickets to this event?  Yes  No

If you answered yes to the above, you must make any on campus ticketing arrangements with Raymond Mesa ([mesa@tickets.ucla.edu](mailto:mesa@tickets.ucla.edu)) at the UCLA Central Ticket Office.

*Thank you for completing this event summary sheet for the UCLA Events Office. Please click the submit button below to submit your form. The Events Office will contact you regarding next steps.*

Submit by Email

Reset Form

# Exhibit A-2



Tony and Bob:

As a follow-up to my meeting with the SJP at UCLA student leadership and conference planners, please see the email below. I had asked if they would share the names of all confirmed speakers or presenters. We ask that you please review for any concerns.

I will share this information and approach at today's IRT meeting.

Thanks so much for all your assistance and support.

Mick

**Mick Deluca**

Assistant Vice Chancellor

**UCLA Student Affairs - Campus Life**

2131 John Wooden Center • Los Angeles, CA 90095

310-206-1753 • [mdeluca@saonet.ucla.edu](mailto:mdeluca@saonet.ucla.edu)

[www.studentaffairs.ucla.edu](http://www.studentaffairs.ucla.edu) • [www.campuslife.ucla.edu](http://www.campuslife.ucla.edu)

[www.recreation.ucla.edu](http://www.recreation.ucla.edu) • [www.sole.ucla.edu](http://www.sole.ucla.edu) • [www.cpo.ucla.edu](http://www.cpo.ucla.edu)

*"Do not let what you cannot do interfere with what you can do"*

John Wooden

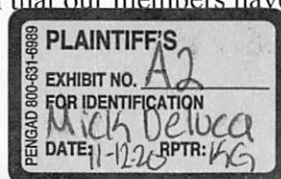
 Please consider the environment before printing this email

**From:** [REDACTED]  
**Sent:** Wednesday, November 7, 2018 5:22 PM  
**To:** Deluca, Mick <[mdeluca@saonet.ucla.edu](mailto:mdeluca@saonet.ucla.edu)>  
**Cc:** Gildea, Jake <[jgildea@saonet.ucla.edu](mailto:jgildea@saonet.ucla.edu)>  
**Subject:** NSJP Speaker List and Signatory Question

Hello VC Deluca,

Thank you for meeting with us last week, and thank you for assisting in consolidating our spaces—this makes things so much more manageable for us, as I'm sure it does on your end too. As you asked, this email contains the list of speakers and workshop facilitators for the conference. Please be mindful that in past years, our speakers' names and personal information have been posted on online blacklists like Canary Mission due to their involvement in the conference. For our speakers' safety, we are not publishing this list outside of our programs, and I request that this list not be spread to an extent further than what is necessary.

One other thing—on Friday we discussed the possibility of a harassment campaign against conference organizers, with our faces posted around campus and our information posted on Canary Mission. These exact things have happened to conference organizers at previous schools, and similar harassment campaigns have been conducted against our own group in previous years. One concern that our members have is that any student can look up who the



Regents of Univ. of Cal. EXHIBIT A - 00043

signatories of SJP are through MyUCLA, and we are worried that this information being freely available is detrimental to our safety. We brought this up with VC Kang's office, and they were amenable to **our proposal that the SOLE system be slightly modified so that signatories of any student group can opt to have their names not visible in the student organization portal.** This would also be beneficial for undocumented, queer, and other student leaders who for safety reasons would not want to be easily associated with their organizations, but still want to participate to the extent that any other student could. This small change could be impactful in protecting us from the harassment that we expect to face. How do you feel about it?

With that said, here is the list of speakers. Note that most of the workshops will be cohosted by several individuals - there are not 70 separate workshops.

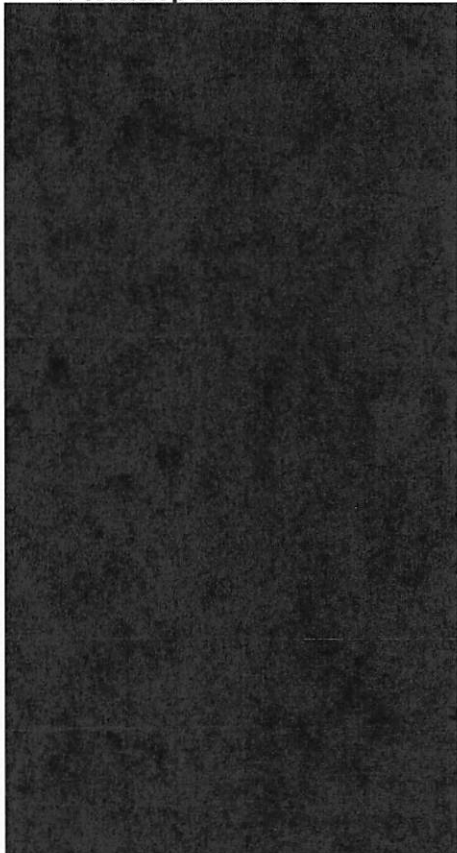
**Keynote Speakers:**

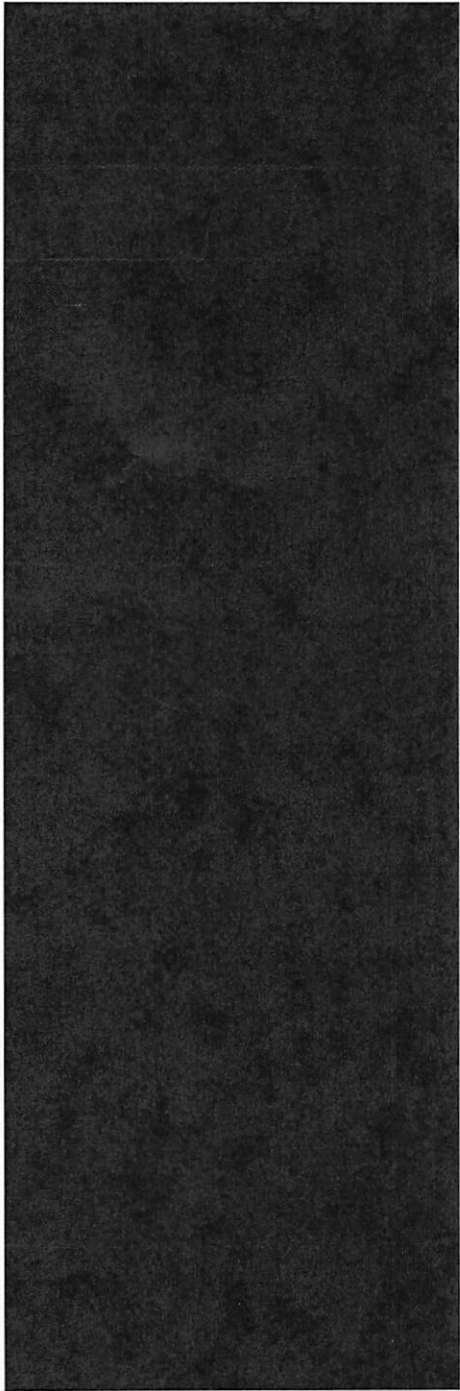


**Panelists:**



**Workshop leaders:**





Please don't hesitate to reach out to SJP at UCLA for any more questions.

Best,



SJP at UCLA



# Exhibit B

[Skip to main content](#)

UCLA

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- [Categories](#)
- [For news media](#)

[Opinion + Voices](#)

## Chancellor Block: Why the controversial Students for Justice in Palestine conference will go on at UCLA

Affording a group its constitutional rights should not be perceived as an institutional endorsement of the group's message

Gene Block | November 13, 2018



UCLA  
Gene Block

*This [op-ed](#) appeared in the Los Angeles Times.*

Our polarized era tests the resolve of those, like me, who lead a university. We urge our students to engage in reasoned debate, but the rancor of the times may turn dialogue on contested topics into a minefield. The Israeli-Palestinian conflict has been among the most volatile issues at UCLA, but that volatility cannot prevent us from addressing it.

This weekend, Students for Justice in Palestine, one of 1,200 UCLA student organizations, plans to host a national conference on our campus. Some students, community members and even the Los Angeles City Council, concerned by anti-Semitic statements made by some SJP members around the country, have demanded that UCLA cancel the event. In the weeks since the mass shooting at Tree of Life Synagogue in Pittsburgh, those calls to cancel only increased. The conference, however, will go on, and it is important to explain why.

On both routine academic matters and controversial issues, the overwhelming majority of university leaders — and that includes me — strive to preserve the rights of all sides to speak and be heard. At the same time, we recognize the often existential impact of emotionally charged debates about issues like the Mideast conflict, immigration, affirmative action and abortion. Preserving the right to speak about such issues does not validate the content of that speech. All too often affording a group their constitutional rights is falsely perceived as an institutional endorsement of their message.

In this case, I have fundamental disagreements with SJP, which has called for boycott against and divestment in Israel, actions that stigmatize that nation and label it a pariah state. The

attempt to ostracize Israeli thinkers, and to declare off-limits even discussion with Israeli academics runs contrary to the values of inclusion, debate and discussion that are crucial to any university.

Those values underpin the University of California's "Principles Against Intolerance," adopted in 2016. Even though our nation's laws protect speech tainted by bias, stereotypes, prejudice and intolerance, the principles stress the need for mutual respect during debate in order to advance UC's mission. The principles also warn about the dangers of anti-Semitic forms of anti-Zionism, in which criticism of Israel morphs into hostility against Jewish people.

When SJP announced its intention to hold its national conference at UCLA, the university recognized its legal right to do so. Much of what will be said at that conference may be deeply objectionable — even personally hurtful — to those who believe that a complex conflict is being reduced to a one-sided caricature, or see a double standard that demonizes the world's only Jewish state while other countries receive less condemnation for dreadful behavior. Indeed, there is fear among some that the conference will be infused with anti-Semitic rhetoric.

There is no easy way to resolve that discomfort. It remains an awkward reality that our constitutional system, and democracy's **commitment to open debate**, demand that Americans allow speech we may oppose and even defend the rights of those who might not defend ours. That proud, yet difficult, tradition goes back to John Adams serving as lawyer for the British soldiers accused of the Boston Massacre. It also extends to our colleges and universities today.

I am disturbed by the rising tide of anti-Semitism in the United States and the world. I believe every American must condemn the religious bigotry and racial animus that too often infects our politics. Ultimately, we must combat speech that is distasteful with more and better speech. If universities can find ways to rise above the current rancor and if our students in particular can model our values, then that may well provide the very best hope for our future.

Tags: [opinion](#) | [Chancellor Gene Block](#) | [university news](#)

# Exhibit C

From: **David Abrams** <[dnabrams@wjlf.org](mailto:dnabrams@wjlf.org)>  
Date: Thu, Nov 15, 2018 at 2:15 PM  
Subject: Freedom of Information Request  
To: <[uclarecordsmanagement@finance.ucla.edu](mailto:uclarecordsmanagement@finance.ucla.edu)>  
Cc: <[ablum@conct.ucla.edu](mailto:ablum@conct.ucla.edu)>

I respectfully request the opportunity to inspect and photocopy the following documents:

- (1) Documents sufficient to identify the 65 keynote speakers, panelists, and workshop presenters referred to in the attached letter;
- (2) All contracts concerning the Students for Justice in Palestine conference being held at UCLA in 2018; and
- (3) All e-mails and other correspondence to and from any Students for Justice in Palestine organization concerning the same conference.

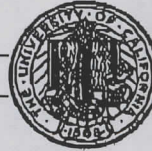
Thank you for your attention to this matter.

Dave Abrams

David Abrams, Executive Director  
Zionist Advocacy Center  
305 Broadway Suite 601  
New York, NY 10007

212-897-5821 [dnabrams@wjlf.org](mailto:dnabrams@wjlf.org)





OFFICE OF THE CHANCELLOR  
BOX 951405  
LOS ANGELES, CALIFORNIA 90095-1405

November 14, 2018

Direct Phone: (310) 825-2284  
Facsimile: (310) 206-2390  
Email: [abluni@conet.ucla.edu](mailto:abluni@conet.ucla.edu)

Via Facsimile (212-897-5811)

David Abrams  
Executive Director  
Zionist Advocacy Center  
305 Broadway Suite  
New York, NY 10007

Dear Mr. Abrams,

On November 6, 2018, we received your letter regarding the National Students for Justice in Palestine ("NSJP") conference to be held at UCLA.<sup>1</sup> In that letter, you assert that UCLA's federal funding may be in jeopardy for permitting the NSJP annual conference to proceed at UCLA. You base this assertion on the argument that UCLA may be in violation of an anti-terrorism certification issued in connection with the receipt of federal funding. You argue that NSJP is associated with terrorism and allowing it to hold a conference at our campus violates the certification against providing material support to individuals or entities that participate in terrorist acts.

The USAID certification from June 7, 2018, provides that to comply with the certification requirements, the Recipient may verify that the individual or entity does not appear on the matter list of Specially Designated Nationals and Blocked Persons which is maintained by OFAC, or is not included in any supplementary information concerning prohibited individuals or entities that may be provided by USAID to the Recipient. See, Part 1 (4)(2)(a)

<https://www.usaid.gov/sites/default/files/documents/1868/303mav.pdf>. It further states that the Recipient will verify that the individual or entity is not listed on the United Nations Security sanctions committee list available online at the Committee's website. *Id.* Part 1 (4)(2)(b).

UCLA has engaged in appropriate due diligence on NSJP and all of the keynote speakers, panelists, and workshop presenters (65 individuals) anticipated for the NSJP conference and none is on the United Nations Sanctions list or the Treasury Department's Blocked Persons list. Additionally, we have confirmed that there are no open federal investigations. Nor are any listed as Foreign Terrorist Organizations.

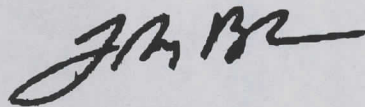
<sup>1</sup> Your letter was erroneously dated January 22, 2018 (attaching an article from April 2018 so clearly an error in the date).

Mr. Abrams  
November 14, 2018  
Page 2 of 2

Therefore, we have concluded that any certification of compliance remains fully intact and federal funding is not at risk by permitting the NSJP conference to proceed on our campus.

We appreciate your reaching out to our campus to express your concerns. The University values input from the community as we support our students' efforts to engage in free and open dialogue on controversial and challenging topics.

Sincerely,

A handwritten signature in black ink, appearing to read 'L. Amy Blum', with a stylized flourish at the end.

L. Amy Blum, Esq.  
Managing Campus Counsel

# Exhibit D



INFORMATION PRACTICES  
10920 WILSHIRE BOULEVARD, SUITE 107  
LOS ANGELES, CA 90024-6543

VIA EMAIL

August 9, 2019

David Abrams  
Zionist Advocacy Center  
Email: dnabrams@wjlf.org

**Re: Public Records Request - PRR # 18-6264**

Dear Mr. Abrams:

Thank you for your recent communications, in which you ask that our office only produce documents responsive to item one of your California Public Records Act (CPRA) request. Item one seeks:

**“Documents sufficient to identify the 65 keynote speakers, panelists, and workshop presenters” at the November 2018 National Students for Justice in Palestine (“NSJP”) Conference (“Conference”).**

Cal. Gov’t Code § 6255 provides that the University may withhold any record if, on the facts of the particular case, the public interest served by not disclosing the record clearly outweighs the public interest served by disclosure of the record. We have been advised, and have confirmed, that speakers and organizers of previous NSJP conferences have been targeted on internet blacklists such as canarymission.org, and have become the objects of threats and harassment. This information is not disclosed by the Conference due to these concerns and any disclosure by UCLA of the names of the keynote speakers, panelists, and workshop presenters at the Conference would create a similar heightened risk of harassment and potential endangerment for these individuals. Under the balancing of public interests, we have concluded that the public interest in protecting against harassment and threats to individual safety outweighs the public interest in disclosure. Therefore, any records that may be responsive to item one are exempt and will not be disclosed.

The University does not intend to imply that you or your organization would use the information for inappropriate purposes, however, pursuant to Cal. Gov’t Code § 6254.5, once the University has released a record to one member of the public, it may be deemed to have waived its rights to withhold the record from other requesters.

If you would still like to receive documents responsive to items two and three of your request, we will continue to produce them on a rolling basis. Please let us know your wishes in this regard. If we have not received your instructions regarding items two and three by August 23, 2019, we will consider this matter closed.

Should you have any questions, please contact me at (310) 794-8741 or via email at [rbaldrige@ucla.edu](mailto:rbaldrige@ucla.edu) and reference the PRR number found above in the subject line.

Sincerely,

A handwritten signature in black ink that reads "Robert Baldrige". The signature is written in a cursive style with a large, prominent "R" at the beginning.

**Robert Baldrige**  
Manager, Records Management & Information Practices  
(310) 794-8741 | (310) 794-8961 (fax) | [records@ucla.edu](mailto:records@ucla.edu)

# Exhibit E

1 FAGEN FRIEDMAN & FULFROST, LLP  
L. Carlos Villegas, SBN 242251  
2 cvillegas@f3law.com  
Shiva E. Stein, SBN 215012  
3 sstein@f3law.com  
Jen Michael-Stevens, SBN 286646  
4 jmichael-stevens@f3law.com  
6300 Wilshire Boulevard, Suite 1700  
5 Los Angeles, California 90048  
Phone: 323-330-6300  
6 Fax: 323-330-6311

7 Attorneys for Regents of the University of  
California

8  
9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
10 **COUNTY OF LOS ANGELES, CENTRAL DISTRICT**

11 DAVID ABRAMS,

12 Plaintiff,

13 vs.

14 REGENTS OF THE UNIVERSITY OF  
CALIFORNIA,

15 Defendant.

CASE NO. 19STCP03648

**DEFENDANT'S SUPPLEMENTAL  
RESPONSE TO SPECIAL  
INTERROGATORIES PROPOUNDED BY  
PLAINTIFF, SET ONE**

Action Filed: 08/22/19  
Trial Date: None Set

16  
17 PROPOUNDING PARTY: Plaintiff DAVID ABRAMS  
18 RESPONDING PARTY: Defendant REGENTS OF THE UNIVERSITY OF CALIFORNIA  
19 SET NO.: SUPPLEMENTAL One

20 Pursuant to Sections 2030.210, *et seq.*, of the California Code of Civil Procedure,  
21 Defendant REGENTS OF THE UNIVERSITY OF CALIFORNIA ("Responding Party") hereby  
22 submits these objections and responses to the First Set of Interrogatories propounded by Plaintiff  
23 DAVID ABRAMS ("Propounding Party").

24 **PRELIMINARY STATEMENT**

25 Responding Party has not completed its investigation of the facts relating to this case, its  
26 discovery or its preparation for trial. All responses and objections contained herein are based only  
27 upon information that is presently available to and specifically known by Responding Party. It is  
28 anticipated that further discovery, independent investigation, legal research and analysis will

1 Department, and UCLA Police Department. In accordance with California Code of Civil  
2 Procedure Section 2030.230 the specific names (with some names redacted to maintain privacy)  
3 may be derived from documentation produced by Responding Party in responses to Petitioner's  
4 Request for Production of Documents, Set One, Exhibit "A"; at pages 1-17, 42-45, 52-70, 74-83,  
5 and 96.

6 **INTERROGATORY NO. 4:**

7 Identify by name all persons the DEFENDANT is aware of who have become the objects  
8 of threats or harassment as a result of speaking at or organizing conferences of National Students  
9 for Justice in Palestine.

10 **RESPONSE TO INTERROGATORY NO. 4:**

11 Interrogatory is vague, ambiguous, unintelligible, assumes facts, lacks foundation,  
12 overbroad, invades privacy. Interrogatory seeks information protected from disclosure by the  
13 attorney-client privilege and attorney work product doctrine. Interrogatory seeks evidence of  
14 central issue in pending litigation. Interrogatory seeks a compilation or summary of documents  
15 already produced. Subject to and without waiving foregoing objections Responding Party states:  
16 In accordance with California Code of Civil Procedure Section 2030.230 examples of targeted  
17 attacks/harassment (with some names redacted to maintain third party/student privacy) may be  
18 derived from documentation produced by Responding Party in responses to Petitioner's Request  
19 for Production of Documents, Set One, Exhibit "A"; including but not limited to pages: 18-41;  
20 46-50, 71-72, 84, 97-175, and 176.

21 **SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 4:**

22 Interrogatory is vague, ambiguous, unintelligible, assumes facts, lacks foundation,  
23 overbroad, invades privacy. Interrogatory seeks information protected from disclosure by the  
24 attorney-client privilege and attorney work product doctrine. Interrogatory seeks evidence of  
25 central issue in pending litigation. Interrogatory seeks a compilation or summary of documents  
26 already produced. As indicated above, interrogatory is vague, ambiguous and overbroad as  
27 "Defendant" is defined by Petitioner as the entire Regents of California Including UCLA  
28 (collectively University). It would be impossible for Respondent to provide a response as to all



1 persons the hundreds of University employees were aware of having been "become the objects of  
2 threats or harassment" as a result of having spoken or organized any conference of National  
3 Students for Justice in Palestine (NSJP). The question assumes University employees are aware of  
4 all speakers or organizers at any NSJP conference, without limitation by date. Subject to and  
5 without waiving foregoing objections Responding Party states: In accordance with California  
6 Code of Civil Procedure Section 2030.230 examples of targeted attacks/harassment/threats  
7 brought to the attention of University (with some names redacted to maintain third party/student  
8 privacy) may be derived from documentation produced by Responding Party in responses to  
9 Petitioner's Request for Production of Documents, Set One, Exhibit "A"; at pages: 18-41; 46-50,  
10 71-72, 84, 97-175, and 176.

11 **INTERROGATORY NO. 5:**

12 Identify by name all persons the DEFENDANT is aware of who have become the objects  
13 of threats or harassment as a result of such person being included on any INTERNET  
14 BLACKLIST identified in response to Interrogatory Number 1.

15 **RESPONSE TO INTERROGATORY NO. 5:**

16 Interrogatory is vague, ambiguous, unintelligible, assumes facts, lacks foundation,  
17 overbroad, invades privacy. Interrogatory seeks information protected from disclosure by the  
18 attorney-client privilege and attorney work product doctrine. Interrogatory seeks evidence of  
19 central issue in pending litigation. Question is not complete in and of itself and refers to preceding  
20 interrogatories. Interrogatory seeks a compilation or summary of documents already produced.  
21 Subject to and without waiving foregoing objections Responding Party states: Lara Kollab,  
22 further, in accordance with California Code of Civil Procedure Section 2030.230 examples of  
23 targeted attacks/harassment (with some names redacted to maintain third party/student privacy)  
24 may be derived from documentation produced by Responding Party in responses to Petitioner's  
25 Request for Production of Documents, Set One, Exhibit "A"; including but not limited to pages:  
26 18-41; 46-50, 71-72, 84, 97-175, and 176.

27 ///

28 ///



----- Forwarded message -----  
From: [REDACTED]  
Date: Wed, May 13, 2015 at 8:30 PM  
Subject: Harassment of student activists  
To: janina montero <[jmontero@saonet.ucla.edu](mailto:jmontero@saonet.ucla.edu)>

Dear Janina,

I hope this email finds you well!

I'm writing to let you know about a new case of harassment of student activists. This time, it is on this [website](http://www.CanaryMission.Org) called CanaryMission.Org, which compiles a list of students, professors and other activists, at least 8 of whom are affiliated with UCLA, including myself. (I am using that particular link because it redirects to the website, which prevents it from getting more "hits." The more hits a website gets, the more prominently it will appear in Google search results.)

# Exhibit F

**Lisa Marie Mendez** You're all just as racist and terrible. Your Israeli representative government authorizes the slaughter of Palestinians while claiming rights to land IT DOES NOT HAVE A RIGHT TO CLAIM. Your people have walked the halls of the US government in silence while The poor were consistently persecuted, hunted like animals and enslaved on their own land. The Jews were close behind, making money all the way, screaming anti-Semitism every time someone looks too closely at who you really are-- white Devils hidden behind a symbol of your faith, whose only desire is capitalization, through any means necessary.

You can call me whatever you want. Doesn't make it true, no matter how much you run around your office with a picture of my screenshot words. Oh, WOW. Hard-hitting stuff, dude. "Random brown chick talks shit to dumb, racist Jews." That's something that will RUSH to the news now.

I made ignorant, racist comments in public. Sure. But I did them in public, for every one to hear. I'm not hiding anything. Look me up all you want. You'll find nothing. You know why? Because I can say whatever I want. It's a public forum. After my initial post to Mayim Bialik, I stopped following her, because I don't agree with her. I voiced what I wanted to say, and kept on. ITS YOU DAMN STUPID FUCKING BORED ASS SHEEP-PEOPLE that kept this going on and on... And to no avail. You know who cares if I told you people I hate your greedy asses? NOBODY. At least, nobody that matters. You had a person from the med school even tell you the same damn thing

They don't care about me, and they care even less about you. You Jews have the fattest wallets, and they just want you to be still and continue to spend your money with them. What do they have to gain from listening to you? Nothing-- but the bad press of firing a minority UCLA student with dependents, for speaking out in anger against Israeli occupation. You're white people. You really think you're gonna look like the victims? Seriously, get over yourselves.

Like · Reply · 13 December at 02:51



CAPTURED BY  
CANARY MISSION

# Exhibit G



13h

This behind me is JDL Bigot Becky. JDL Bigot Becky called my Palestinian friends terrorists and me and my Jewish friends "kapos" and "nazi collaborators" for protesting Israeli occupation and apartheid. Don't be like JDL Bigot Becky. #ReturnTheBirthright