

1 Kelly A. Aviles (SBN 257168)  
2 LAW OFFICES OF KELLY AVILES  
3 1502 Foothill Blvd., #103-140  
4 La Verne, California 91750  
5 Telephone: (909) 991-7560  
6 Facsimile: (909) 991-7594  
7 Email: kaviles@opengovlaw.com

8 Adam Steinbaugh (SBN 304829)  
9 FOUNDATION FOR INDIVIDUAL RIGHTS IN EDUCATION  
10 510 Walnut Street, Suite 1250  
11 Philadelphia, Pennsylvania 19106  
12 Telephone: (215) 717-3473  
13 Facsimile: (215) 717-3440  
14 Email: adam@thefire.org

15 Attorneys for Plaintiff  
16 FOUNDATION FOR INDIVIDUAL RIGHTS IN EDUCATION, INC.

**FILED**  
Superior Court of California  
County of Los Angeles  
10/20/2020

Sherri R. Carter, Executive Officer / Clerk of Court  
By:           A. Rodriguez           Deputy

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**SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
**COUNTY OF LOS ANGELES**

FOUNDATION FOR INDIVIDUAL  
RIGHTS IN EDUCATION, INC., a  
nonprofit corporation,

Petitioner/Plaintiff,

v.

REGENTS OF THE UNIVERSITY OF  
CALIFORNIA; UNIVERSITY OF  
CALIFORNIA, LOS ANGELES; and DOES  
1 THROUGH 5.

Respondents/Defendants.

Case No.19STCP01033

*Assigned for all purposes to the  
Hon. Mitchell Beckloff*

~~Proposed~~ **STIPULATED  
JUDGMENT**

Action Filed: April 4, 2019

The parties stipulate that Judgment may be entered on the terms set forth below in favor of the Petitioner/Plaintiff FOUNDATION FOR INDIVIDUAL RIGHTS IN EDUCATION, INC. ("FIRE") and against Respondent/Defendant REGENTS OF THE UNIVERSITY OF

1 CALIFORNIA, for itself and sued as UNIVERSITY OF CALIFORNIA, LOS ANGELES  
2 (collectively “UCLA”) as follows:

3 A. On March 2, 2018, Petitioner submitted a request to UCLA for copies of records  
4 as set forth on **Exhibit A** (the “Request”). In particular the Request sought:

- 5 1. A copy of any video of United States Secretary of the Treasury Steven Mnuchin  
6 speaking at the University of California, Los Angeles.  
7 2. A copy of any agreement or contract concerning Sec. Mnuchin’s appearance at  
8 UCLA.  
9 3. Any communications with Sec. Mnuchin or anyone acting on his behalf  
concerning the release or non-release of audio or video of Sec. Mnuchin’s  
appearance at UCLA.

10 B. The Request reasonably described identifiable records.

11 C. Records responsive to Request No. 1 were made available by March 9, 2018.

12 D. On April 10, 2019, UCLA made available to Petitioner the records attached as  
13 **Exhibit B** in response to Request No. 3 and wrote Petitioner that there were no  
14 documents responsive to Request No. 2.

15 E. In light of the scope of the requested records sought by Requests Nos. 2 and 3,  
16 UCLA failed to make the records responsive to Requests Nos. 2 and 3, to the extent  
17 they existed, available promptly within the meaning of California Government Code  
18 § 6253(b), and the timing of when the public records were made available to Petitioner  
objectively resulted in a delay of Petitioner’s inspection or copying of those records.

19 F. On March 9, 2018, UCLA wrote Petitioner a letter stating in part that “we  
20 require additional time to respond to your [March 2, 2018] request, due to the following  
21 circumstance(s): [X]<sup>1</sup> The need to search for and collect the requested records from field  
22 facilities or other establishments that are separate from the office processing the  
23 request.” The office processing the request was UCLA’s Office of Information  
24 Practices, 10920 Wilshire Blvd., Ste 107, Los Angeles, CA 90024. The March 9, 2018  
25 letter stated an estimated extension date of March 26, 2018 by which a determination  
26 would be dispatched to Petitioner of whether the request, in whole or in part, sought

27 \_\_\_\_\_  
28 <sup>1</sup> “[X]” represents a checked box indicating a selection from a list.

1 copies of disclosable public records in the possession of the UCLA. UCLA's March 9,  
2 2018 letter did respond to Petitioner's Request No. 1, stating: "at this time, pursuant to  
3 California Government Code section 6253, we are able to make the requested video  
4 available to you. UCLA received consent from the U.S. Treasury Department on March 9,  
5 2018 to post the full video of Secretary Mnuchin's recent presentation at UCLA to the  
6 Burkle Center's website. The link to the video is now posted:

7 <http://www.international.ucla.edu/burkle/multimedia/189606>. This link serves to  
8 complete our production in response to your request for the video of the event."

9 G. On March 26, 2018, UCLA sent Petitioner a written determination stating June  
10 29, 2018 as an estimated date when the disclosable records would be made available to  
11 Petitioner. UCLA sent four subsequent communications extending the estimated date  
12 and time when the disclosable records would be made available, the last of which  
13 extended the estimated date when the disclosable records would be made available to  
14 April 30, 2019. Copies of those letters and the March 9, 2018 letter written by UCLA  
15 are attached as **Exhibit C**.

16 H. Without admitting whether UCLA constitutes a "state or local agency" for  
17 purposes of California Government Code § 6253.3, UCLA states that it did not allow  
18 another party to control the disclosure of information in response to Petitioner's March  
19 2, 2018 request.

20 I. Based on the language of the judgment set forth above, Petitioner reserves its  
21 right to seek costs by memorandum and reasonable attorneys' fees pursuant to  
22 Government Code § 6259 by noticed motion and the Court may determine whether  
23 Petitioner is the prevailing party and entitled to an award of reasonable attorneys' fees  
24 and costs. UCLA reserves the right to oppose and seek to tax any costs sought, and to  
25 contest the amount and reasonableness of attorneys' fees sought.

26 J. The undersigned counsel represent that they have been granted authority by their respective  
27 clients to enter into this agreement and execute this stipulation pursuant to the Respondents'  
28 Offer of Judgment which is attached hereto as **Exhibit D**.

WHEREFORE, the Judgment set forth in paragraphs A-H above is hereby entered, with

1 any attorneys' fees award and costs to Petitioner to be determined at a later date and the  
2 Judgment amended consistent therewith.



Handwritten signature of Mitchell Beckloff in black ink.

3  
4 DATED: 10/20/2020

Mitchell L. Beckloff / Judge  
The Honorable Mitchell Beckloff  
Judge of the Superior Court of California,  
County of Los Angeles

5  
6 Dated: September 30, 2020

7  
8 LAW OFFICES OF KELLY A. AVILES

Handwritten signature of Kelly A. Aviles in black ink.  
Kelly A. Aviles  
Attorney for Petitioner FIRE

9  
10  
11  
12 Dated: October 14, 2020

13  
14 REED SMITH LLP

Handwritten signature of Raymond A. Cardozo in black ink.  
Raymond A. Cardozo  
Attorney for Regents of The University Of  
California

# **EXHIBIT A**

**From:** [Adam Steinbaugh](mailto:Adam.Steinbaugh@ucla.edu)  
**To:** [records@ucla.edu](mailto:records@ucla.edu)  
**Subject:** Records request: MnuchIn appearance  
**Date:** Friday, March 02, 2018 7:30:14 AM

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To whom it may concern:

This is a request for the following records pursuant to the California Public Records Act (Gov. Code § 6250 *et seq.*).

**Records Requested:**

1. A copy of any video of United States Secretary of the Treasury Steven Mnuchin speaking at the University of California, Los Angeles.
2. A copy of any agreement or contract concerning Sec. Mnuchin's appearance at UCLA.
3. Any communications with Sec. Mnuchin or anyone acting on his behalf concerning the release or non-release of audio or video of Sec. Mnuchin's appearance at UCLA.

**Request for expedited processing:** The records pertain to a matter of public importance and current debate. Providing expedited production of the records will facilitate the public understanding of these matters before they are fully resolved. Any undue delay in production will undermine the purpose of the public records laws, which serve to allow public input and oversight of government affairs.

**Fee waiver request:** This request is made on behalf of the Foundation for Individual Rights in Education, a nonprofit and nonpartisan organization that works to preserve civil liberties on college campuses. We request a waiver of any fees or costs associated with this request.

This request concerns a matter of public interest. The records are not sought for a commercial or personal interest, but rather for the purpose of providing the public with information concerning civil liberties in higher education.

Please provide a determination, if not responsive records, within ten days, as required by Cal. Gov. Code § 6253(c). If providing the records will take longer, please cite the extenuating circumstances and let me know when I should expect the requested records.

**Request for Privilege Log:** If any otherwise responsive documents are withheld on the basis that they are privileged or fall within a statutory exemption, please provide a privilege log setting forth (1) the subject matter of the document; (2) the person(s) who sent and received the document; (3) the date the document was created or sent; and (4) the basis on which it is the document is withheld.

**Please note that this request does not seek a search of faculty or student email accounts or records.** These requests should in no way be construed to include a review or search of email accounts, websites, or other forms of data or document retention which are controlled by students, alumni, or faculty members, nor by governmental or advisory bodies controlled by the same. Any search should be limited to documents held by the administration and/or its staff members, including records created or maintained by persons acting in the capacity of administrators or staff members.

If I can be of assistance in interpreting or narrowing this request, please don't hesitate to ask.

Best,

**Adam B. Steinbaugh**

Sr. Program Officer and Investigative Reporter

Foundation for Individual Rights in Education

510 Walnut Street

Suite 1250

Philadelphia, PA 19106

(215) 717-3473

adam@thefire.org

*This communication may contain information that is confidential or privileged. Unless you are the addressee (or authorized to receive this message by the addressee), you may not use, copy, or disclose the contents of this message or information contained in this message to anyone. If you believe that you have received this message in error, please advise the sender and delete this message.*

# **EXHIBIT B**

**From:** [UCLA Public Records](#)  
**To:** [adam@thefire.org](mailto:adam@thefire.org); [kaviles@opengovlaw.com](mailto:kaviles@opengovlaw.com)  
**Cc:** [Baldrige, Robert](#); [Donmez, Ayse](#)  
**Subject:** RE: Records request: Mnuchin appearance (18-5443)  
**Date:** Wednesday, April 10, 2019 4:50:10 PM  
**Attachments:** [Request \(18-5443\).pdf](#)  
[Treasury Department Emails for FIRE \(18-5443\).pdf](#)  
[Response Letter \(18-5443\).pdf](#)

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Dear Mr. Adam B. Steinbaugh,  
Please find attached a Response Letter and the records that are responsive to your request.  
Your original request is also attached for your reference.  
Best regards,  
UCLA Information Practices  
[records@ucla.edu](mailto:records@ucla.edu)  
(310) 794-8741

**From:** [Adam Steinbaugh](mailto:Adam.Steinbaugh@ucla.edu)  
**To:** [records@ucla.edu](mailto:records@ucla.edu)  
**Subject:** Records request: MnuchIn appearance  
**Date:** Friday, March 02, 2018 7:30:14 AM

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To whom it may concern:

This is a request for the following records pursuant to the California Public Records Act (Gov. Code § 6250 *et seq.*).

**Records Requested:**

1. A copy of any video of United States Secretary of the Treasury Steven Mnuchin speaking at the University of California, Los Angeles.
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3. Any communications with Sec. Mnuchin or anyone acting on his behalf concerning the release or non-release of audio or video of Sec. Mnuchin's appearance at UCLA.

**Request for expedited processing:** The records pertain to a matter of public importance and current debate. Providing expedited production of the records will facilitate the public understanding of these matters before they are fully resolved. Any undue delay in production will undermine the purpose of the public records laws, which serve to allow public input and oversight of government affairs.

**Fee waiver request:** This request is made on behalf of the Foundation for Individual Rights in Education, a nonprofit and nonpartisan organization that works to preserve civil liberties on college campuses. We request a waiver of any fees or costs associated with this request.

This request concerns a matter of public interest. The records are not sought for a commercial or personal interest, but rather for the purpose of providing the public with information concerning civil liberties in higher education.

Please provide a determination, if not responsive records, within ten days, as required by Cal. Gov. Code § 6253(c). If providing the records will take longer, please cite the extenuating circumstances and let me know when I should expect the requested records.

**Request for Privilege Log:** If any otherwise responsive documents are withheld on the basis that they are privileged or fall within a statutory exemption, please provide a privilege log setting forth (1) the subject matter of the document; (2) the person(s) who sent and received the document; (3) the date the document was created or sent; and (4) the basis on which it is the document is withheld.

**Please note that this request does not seek a search of faculty or student email accounts or records.** These requests should in no way be construed to include a review or search of email accounts, websites, or other forms of data or document retention which are controlled by students, alumni, or faculty members, nor by governmental or advisory bodies controlled by the same. Any search should be limited to documents held by the administration and/or its staff members, including records created or maintained by persons acting in the capacity of administrators or staff members.

If I can be of assistance in interpreting or narrowing this request, please don't hesitate to ask.

Best,

**Adam B. Steinbaugh**

Sr. Program Officer and Investigative Reporter

Foundation for Individual Rights in Education

510 Walnut Street

Suite 1250

Philadelphia, PA 19106

(215) 717-3473

adam@thefire.org

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

VIA EMAIL

April 10, 2019

Adam B. Steinbaugh  
Foundation for Individual Rights in Education (FIRE)  
Email: adam@thefire.org

**Re: Public Records Request - PRR # 18-5443**

Dear Mr. Adam B. Steinbaugh:

We have reviewed your California Public Records Act (CPRA) request dated March 2, 2018, herein enclosed. Our search for responsive records is complete and, pursuant to Cal. Gov't Code section 6253(b), we are making the requested records available to you. An enumerated list of the records you requested follows below.

**1. A copy of any video of United States Secretary of the Treasury Steven Mnuchin speaking at the University of California, Los Angeles.**

The full video of Secretary Mnuchin's presentation at UCLA was posted to the Burkle Center's website on March 9, 2018. The video is still available at the following link:

<http://www.international.ucla.edu/burkle/multimedia/189606>.

This link serves to complete our production in response to your request for the video of the event.

**2. A copy of any agreement or contract concerning Sec. Mnuchin's appearance at UCLA.**

The search for records and subsequent review has now been completed and we have located no written contract or agreement responsive to this request. Please note, however, that some of the emails being produced mention a verbal agreement.

**3. Any communications with Sec. Mnuchin or anyone acting on his behalf concerning the release or non-release of audio or video of Sec. Mnuchin's appearance at UCLA.**

The search for records responsive to this request has been completed, along with a subsequent review, and we are producing the responsive documents with this letter.

Letter to Adam B. Steinbaugh  
PRR #18-5443  
April 10, 2019

Although the CPRA authorizes UCLA to charge for reproduction costs and/or programming services,<sup>[1]</sup> as a courtesy these fees have been waived. Any subsequent requests may be subject to copying and/or programming fees.

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,



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

Enclosure

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<sup>[1]</sup> California Government Code §6253(b)

**From:** [Lieben, Alexandra](#)  
**To:** [Raustiala, Kal](#)  
**Subject:** FW: Feb. 26 - UCLA event  
**Date:** Wednesday, February 28, 2018 6:04:02 PM

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Here is the summary of my most recent conversation with Tony Sayegh, the Assistant Secretary for Public Affairs of the US Department of the Treasury. As you can see, this restates and confirms the agreement with had with them to podcast and videotape the lecture.

I sent him this email as record of our conversation and he never objected to any of it. Prior to that, I had conversations about this with Zach Isakowitz and with James Littlefair, both staff members of Secretary Mnuchin's office.

Alexandra

Alexandra Lieben  
Deputy Director  
UCLA Burkle Center for International Relations

p: (310)206-4071  
f: (310)206-3555  
[alieben@international.ucla.edu](mailto:alieben@international.ucla.edu)  
[www.international.ucla.edu/burkle](http://www.international.ucla.edu/burkle)

---

**From:** Alexandra Lieben <[alieben@international.ucla.edu](mailto:alieben@international.ucla.edu)>  
**Date:** Tuesday, February 6, 2018 at 5:45 PM  
**To:** "Tony.Sayegh@treasury.gov" <[Tony.Sayegh@treasury.gov](mailto:Tony.Sayegh@treasury.gov)>  
**Cc:** "Wrench, Sophia" <[swrench@international.ucla.edu](mailto:swrench@international.ucla.edu)>, "Zachary.Isakowitz@treasury.gov" <[Zachary.Isakowitz@treasury.gov](mailto:Zachary.Isakowitz@treasury.gov)>  
**Subject:** Feb. 26 - UCLA event

Hi Tony,

It was great talking with you earlier today.

To summarize what we discussed and then confirmed again before we signed off, you are okay with the Burkle Center and Marketplace audiotaping and with the Burkle Center videotaping the event. We will post both podcast and video on our Burkle Center website. Marketplace will use excerpts of the event in their show the following day and, like we do, will post the audio of the entire event on their website. We agreed to shorten the interview with The Generation, our student magazine, from 20 to 15 minutes. We also agreed to shorten Secretary Mnuchin's introductory remarks from 15 to 5-10 minutes, as well as to shorten the conversation with Kai Ryssdal from 35 to 30 minutes. And we will leave the Q&A with the audience at 25 minutes. Thank you for agreeing to the intern photo at the end of the lecture. That only takes a few minutes and makes them very happy.

As explained, since the dinner at Mr. Burkle's house will be in his dining room, the best possible place for a meaningful and intimate conversation, the format will be rather informal

there as well. It would be wonderful if Secretary Mnuchin, after Burkle Center Kal Raustiala's welcome, could start the conversation off with about 5 min. of solo remarks. Then Kal will ask one or two questions to get the conversation around the table started. There will be probably about 20 people present.

As you and I discussed, the easiest way for Kai Ryssdal to get a better understanding of what Secretary Mnuchin will cover in his introductory remarks at UCLA, will be for Mr. Ryssdal or his executive producer Nancy Farghalli to speak with you directly. I will e-introduce you to Nancy after this email.

We are truly excited and are very much looking forward to welcoming Secretary Mnuchin to UCLA!

Best,  
Alexandra

Alexandra Lieben  
Deputy Director  
UCLA Burkle Center for International Relations

11353 Bunche Hall  
Los Angeles, CA 90095  
P: (310) 206-4071  
[www.burkle.ucla.edu](http://www.burkle.ucla.edu)

**From:** [Raustiala, Kal](#)  
**To:** [Lieben, Alexandra](#)  
**Subject:** Re: Feb. 26 - UCLA event  
**Date:** Wednesday, February 28, 2018 6:13:55 PM

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I think this only applies to gov officials, and you didn't do anything wrong—no one anticipated this-- but for Schiff for example we should either ask them "Do we have your permission to video..." OR send them a release to sign. Or otherwise eliminate the opportunity for them to post hoc lie and say, we never agreed to that.

---

**From:** alexandra lieben  
**Date:** Wednesday, February 28, 2018 at 6:11 PM  
**To:** Kal Raustiala  
**Subject:** Re: Feb. 26 - UCLA event

His media person said affirmatively yes and I confirmed it in writing. What else would you have wanted me to do?

Alexandra Lieben  
Deputy Director  
UCLA Burkle Center for International Relations

p: (310)206-4071  
f: (310)206-3555  
[alieben@international.ucla.edu](mailto:alieben@international.ucla.edu)  
[www.international.ucla.edu/burkle](http://www.international.ucla.edu/burkle)

---

**From:** Kal Raustiala <[raustiala@law.ucla.edu](mailto:raustiala@law.ucla.edu)>  
**Date:** Wednesday, February 28, 2018 at 6:06 PM  
**To:** Alexandra Lieben <[alieben@international.ucla.edu](mailto:alieben@international.ucla.edu)>  
**Subject:** Re: Feb. 26 - UCLA event

Great. I think in the future with sitting gov officials we probably want them to affirmatively say yes or something to that effect. But this is good.

---

**From:** alexandra lieben  
**Date:** Wednesday, February 28, 2018 at 6:03 PM  
**To:** Kal Raustiala  
**Subject:** FW: Feb. 26 - UCLA event

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that, I had conversations about this with Zach Isakowitz and with James Littlefair, both staff members of Secretary Mnuchin's office.

Alexandra

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UCLA Burkle Center for International Relations

p: (310)206-4071  
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---

**From:** Alexandra Lieben <[alieben@international.ucla.edu](mailto:alieben@international.ucla.edu)>  
**Date:** Tuesday, February 6, 2018 at 5:45 PM  
**To:** "Tony.Savegh@treasury.gov" <[Tony.Savegh@treasury.gov](mailto:Tony.Savegh@treasury.gov)>  
**Cc:** "Wrench, Sophia" <[swrench@international.ucla.edu](mailto:swrench@international.ucla.edu)>, "[Zachary.Isakowitz@treasury.gov](mailto:Zachary.Isakowitz@treasury.gov)" <[Zachary.Isakowitz@treasury.gov](mailto:Zachary.Isakowitz@treasury.gov)>  
**Subject:** Feb. 26 - UCLA event

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As explained, since the dinner at Mr. Burkle's house will be in his dining room, the best possible place for a meaningful and intimate conversation, the format will be rather informal there as well. It would be wonderful if Secretary Mnuchin, after Burkle Center Kal Raustiala's welcome, could start the conversation off with about 5 min. of solo remarks. Then Kal will ask one or two questions to get the conversation around the table started. There will be probably about 20 people present.

As you and I discussed, the easiest way for Kai Ryssdal to get a better understanding of what Secretary Mnuchin will cover in his introductory remarks at UCLA, will be for Mr. Ryssdal or his executive producer Nancy Farghalli to speak with you directly. I will e-introduce you to Nancy after this email.

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Los Angeles, CA 90095  
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[www.burkle.ucla.edu](http://www.burkle.ucla.edu)

**From:** [Lieben, Alexandra](#)  
**To:** [Raustiala, Kal](#)  
**Subject:** Re: Feb. 26 - UCLA event  
**Date:** Wednesday, February 28, 2018 6:11:58 PM

---

His media person said affirmatively yes and I confirmed it in writing. What else would you have wanted me to do?

Alexandra Lieben  
Deputy Director  
UCLA Burkle Center for International Relations

p: (310)206-4071  
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[alieben@international.ucla.edu](mailto:alieben@international.ucla.edu)  
[www.international.ucla.edu/burkle](http://www.international.ucla.edu/burkle)

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**To:** Alexandra Lieben <[alieben@international.ucla.edu](mailto:alieben@international.ucla.edu)>  
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**Cc:** "Wrench, Sophia" <[swrench@international.ucla.edu](mailto:swrench@international.ucla.edu)>, "[Zachary.Isakowitz@treasury.gov](mailto:Zachary.Isakowitz@treasury.gov)" <[Zachary.Isakowitz@treasury.gov](mailto:Zachary.Isakowitz@treasury.gov)>  
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As explained, since the dinner at Mr. Burkle's house will be in his dining room, the best possible place for a meaningful and intimate conversation, the format will be rather informal there as well. It would be wonderful if Secretary Mnuchin, after Burkle Center Kal Raustiala's welcome, could start the conversation off with about 5 min. of solo remarks. Then Kal will ask one or two questions to get the conversation around the table started. There will be probably about 20 people present.

As you and I discussed, the easiest way for Kai Ryssdal to get a better understanding of what Secretary Mnuchin will cover in his introductory remarks at UCLA, will be for Mr. Ryssdal or his executive producer Nancy Farghalli to speak with you directly. I will e-introduce you to Nancy after this email.

We are truly excited and are very much looking forward to welcoming Secretary Mnuchin to UCLA!

Best,  
Alexandra

Alexandra Lieben  
Deputy Director  
UCLA Burkle Center for International Relations

11353 Bunche Hall

Los Angeles, CA 90095  
P: (310) 206-4071  
[www.burkle.ucla.edu](http://www.burkle.ucla.edu)

**From:** [Raustiala, Kal](#)  
**To:** [Lieben, Alexandra](#)  
**Subject:** Re: Feb. 26 - UCLA event  
**Date:** Wednesday, February 28, 2018 6:06:05 PM

---

Great. I think in the future with sitting gov officials we probably want them to affirmatively say yes or something to that effect. But this is good.

---

**From:** alexandra lieben  
**Date:** Wednesday, February 28, 2018 at 6:03 PM  
**To:** Kal Raustiala  
**Subject:** FW: Feb. 26 - UCLA event

Here is the summary of my most recent conversation with Tony Sayegh, the Assistant Secretary for Public Affairs of the US Department of the Treasury. As you can see, this restates and confirms the agreement with had with them to podcast and videotape the lecture.

I sent him this email as record of our conversation and he never objected to any of it. Prior to that, I had conversations about this with Zach Isakowitz and with James Littlefair, both staff members of Secretary Mnuchin's office.

Alexandra

Alexandra Lieben  
Deputy Director  
UCLA Burkle Center for International Relations

p: (310)206-4071  
f: (310)206-3555  
[alieben@international.ucla.edu](mailto:alieben@international.ucla.edu)  
[www.international.ucla.edu/burkle](http://www.international.ucla.edu/burkle)

---

**From:** Alexandra Lieben <[alieben@international.ucla.edu](mailto:alieben@international.ucla.edu)>  
**Date:** Tuesday, February 6, 2018 at 5:45 PM  
**To:** "[Tony.Sayegh@treasury.gov](mailto:Tony.Sayegh@treasury.gov)" <[Tony.Sayegh@treasury.gov](mailto:Tony.Sayegh@treasury.gov)>  
**Cc:** "Wrench, Sophia" <[swrench@international.ucla.edu](mailto:swrench@international.ucla.edu)>, "[Zachary.Isakowitz@treasury.gov](mailto:Zachary.Isakowitz@treasury.gov)" <[Zachary.Isakowitz@treasury.gov](mailto:Zachary.Isakowitz@treasury.gov)>  
**Subject:** Feb. 26 - UCLA event

Hi Tony,

It was great talking with you earlier today.

To summarize what we discussed and then confirmed again before we signed off, you are okay with the Burkle Center and Marketplace audiotaping and with the Burkle Center videotaping the event. We will post both podcast and video on our Burkle Center website.

Marketplace will use excerpts of the event in their show the following day and, like we do, will post the audio of the entire event on their website. We agreed to shorten the interview with The Generation, our student magazine, from 20 to 15 minutes. We also agreed to shorten Secretary Mnuchin's introductory remarks from 15 to 5-10 minutes, as well as to shorten the conversation with Kai Ryssdal from 35 to 30 minutes. And we will leave the Q&A with the audience at 25 minutes. Thank you for agreeing to the intern photo at the end of the lecture. That only takes a few minutes and makes them very happy.

As explained, since the dinner at Mr. Burkle's house will be in his dining room, the best possible place for a meaningful and intimate conversation, the format will be rather informal there as well. It would be wonderful if Secretary Mnuchin, after Burkle Center Kal Raustiala's welcome, could start the conversation off with about 5 min. of solo remarks. Then Kal will ask one or two questions to get the conversation around the table started. There will be probably about 20 people present.

As you and I discussed, the easiest way for Kai Ryssdal to get a better understanding of what Secretary Mnuchin will cover in his introductory remarks at UCLA, will be for Mr. Ryssdal or his executive producer Nancy Farghalli to speak with you directly. I will e-introduce you to Nancy after this email.

We are truly excited and are very much looking forward to welcoming Secretary Mnuchin to UCLA!

Best,  
Alexandra

Alexandra Lieben  
Deputy Director  
UCLA Burkle Center for International Relations

11353 Bunche Hall  
Los Angeles, CA 90095  
P: (310) 206-4071  
[www.burkle.ucla.edu](http://www.burkle.ucla.edu)

**From:** [Lieben, Alexandra](#)  
**To:** [Raustiala, Kal](#)  
**Subject:** Re: Feb. 26 - UCLA event  
**Date:** Wednesday, February 28, 2018 6:16:03 PM

---

Okay.

Alexandra Lieben  
Deputy Director  
UCLA Burkle Center for International Relations

p: (310)206-4071  
f: (310)206-3555  
[alieben@international.ucla.edu](mailto:alieben@international.ucla.edu)  
[www.international.ucla.edu/burkle](http://www.international.ucla.edu/burkle)

---

**From:** Kal Raustiala <[raustiala@law.ucla.edu](mailto:raustiala@law.ucla.edu)>  
**Date:** Wednesday, February 28, 2018 at 6:14 PM  
**To:** Alexandra Lieben <[alieben@international.ucla.edu](mailto:alieben@international.ucla.edu)>  
**Subject:** Re: Feb. 26 - UCLA event

I think this only applies to gov officials, and you didn't do anything wrong—no one anticipated this-- but for Schiff for example we should either ask them "Do we have your permission to video..." OR send them a release to sign. Or otherwise eliminate the opportunity for them to post hoc lie and say, we never agreed to that.

---

**From:** alexandra lieben  
**Date:** Wednesday, February 28, 2018 at 6:11 PM  
**To:** Kal Raustiala  
**Subject:** Re: Feb. 26 - UCLA event

His media person said affirmatively yes and I confirmed it in writing. What else would you have wanted me to do?

Alexandra Lieben  
Deputy Director  
UCLA Burkle Center for International Relations

p: (310)206-4071  
f: (310)206-3555  
[alieben@international.ucla.edu](mailto:alieben@international.ucla.edu)  
[www.international.ucla.edu/burkle](http://www.international.ucla.edu/burkle)

---

**From:** Kal Raustiala <[raustiala@law.ucla.edu](mailto:raustiala@law.ucla.edu)>

**Date:** Wednesday, February 28, 2018 at 6:06 PM  
**To:** Alexandra Lieben <[alieben@international.ucla.edu](mailto:alieben@international.ucla.edu)>  
**Subject:** Re: Feb. 26 - UCLA event

Great. I think in the future with sitting gov officials we probably want them to affirmatively say yes or something to that effect. But this is good.

---

**From:** alexandra lieben  
**Date:** Wednesday, February 28, 2018 at 6:03 PM  
**To:** Kal Raustiala  
**Subject:** FW: Feb. 26 - UCLA event

Here is the summary of my most recent conversation with Tony Sayegh, the Assistant Secretary for Public Affairs of the US Department of the Treasury. As you can see, this restates and confirms the agreement with had with them to podcast and videotape the lecture.

I sent him this email as record of our conversation and he never objected to any of it. Prior to that, I had conversations about this with Zach Isakowitz and with James Littlefair, both staff members of Secretary Mnuchin's office.

Alexandra

Alexandra Lieben  
Deputy Director  
UCLA Burkle Center for International Relations

p: (310)206-4071  
f: (310)206-3555  
[alieben@international.ucla.edu](mailto:alieben@international.ucla.edu)  
[www.international.ucla.edu/burkle](http://www.international.ucla.edu/burkle)

---

**From:** Alexandra Lieben <[alieben@international.ucla.edu](mailto:alieben@international.ucla.edu)>  
**Date:** Tuesday, February 6, 2018 at 5:45 PM  
**To:** "Tony.Sayegh@treasury.gov" <[Tony.Sayegh@treasury.gov](mailto:Tony.Sayegh@treasury.gov)>  
**Cc:** "Wrench, Sophia" <[swrench@international.ucla.edu](mailto:swrench@international.ucla.edu)>, "Zachary.Isakowitz@treasury.gov" <[Zachary.Isakowitz@treasury.gov](mailto:Zachary.Isakowitz@treasury.gov)>  
**Subject:** Feb. 26 - UCLA event

Hi Tony,

It was great talking with you earlier today.

To summarize what we discussed and then confirmed again before we signed off, you are okay with the Burkle Center and Marketplace audiotaping and with the Burkle Center videotaping the event. We will post both podcast and video on our Burkle Center website.

Marketplace will use excerpts of the event in their show the following day and, like we do, will post the audio of the entire event on their website. We agreed to shorten the interview with The Generation, our student magazine, from 20 to 15 minutes. We also agreed to shorten Secretary Mnuchin's introductory remarks from 15 to 5-10 minutes, as well as to shorten the conversation with Kai Ryssdal from 35 to 30 minutes. And we will leave the Q&A with the audience at 25 minutes. Thank you for agreeing to the intern photo at the end of the lecture. That only takes a few minutes and makes them very happy.

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We are truly excited and are very much looking forward to welcoming Secretary Mnuchin to UCLA!

Best,  
Alexandra

Alexandra Lieben  
Deputy Director  
UCLA Burkle Center for International Relations

11353 Bunche Hall  
Los Angeles, CA 90095  
P: (310) 206-4071  
[www.burkle.ucla.edu](http://www.burkle.ucla.edu)

# **EXHIBIT C**



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

VIA EMAIL

March 9, 2018

Mr. Adam B. Steinbaugh  
Foundation for Individual Rights in Education (FIRE)  
Email: adam@thefire.org

**RE: Public Records Request - PRR # 18-5443**

Dear Mr. Adam B. Steinbaugh:

The purpose of this letter is to confirm that UCLA Information Practices (IP) continues to work on your public records request dated March 2, 2018, herein enclosed. As allowed pursuant to Cal. Gov't Code Section 6253(c), we require additional time to respond to your request, due to the following circumstance(s):

- The need to search for and collect the requested records from field facilities or other establishments that are separate from the office processing the request.
- The need to search for, collect, and appropriately examine a voluminous amount of separate and distinct records that are demanded in the request.
- The need for consultation, which shall be conducted with all practicable speed, with two or more components of the agency having substantial subject matter interest therein.
- The need to compile and/or extract data.

IP will respond to your request no later than the close of business on March 26, 2018 with an estimated date that responsive documents will be made available.

However, at this time, pursuant to California Government Code section 6253, we are able to make the requested video available to you. UCLA received consent from the U.S. Treasury Department on March 9, 2018 to post the full video of Secretary Mnuchin's recent presentation at UCLA to the Burkle Center's website. The link to the video is now posted: <http://www.international.ucla.edu/burkle/multimedia/189606>. This link serves to complete our production in response to your request for the video of the event

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".

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

Enclosure

**From:** [UCLA Public Records](#)  
**To:** [adam@thefire.org](mailto:adam@thefire.org)  
**Cc:** [Baldrige, Robert](#); [Donmez, Ayse](#)  
**Subject:** RE: Records request: Mnuchin appearance (18-5443)  
**Date:** Monday, March 26, 2018 6:36:01 PM  
**Attachments:** [Request \(18-5443\).PDF](#)  
[Letter of Estimated Availability \(18-5443\).pdf](#)

---

Dear Mr. Adam B. Steinbaugh,

Please find attached a Letter of Estimated Availability as well as your original request for your reference.

Best regards,

UCLA Information Practices  
[records@ucla.edu](mailto:records@ucla.edu)  
(310) 794-8741



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

VIA EMAIL

March 26, 2018

Mr. Adam B. Steinbaugh  
Foundation for Individual Rights in Education (FIRE)  
Email: [adam@thefire.org](mailto:adam@thefire.org)

**Re: Public Records Request - PRR # 18-5443**

Dear Mr. Adam B. Steinbaugh:

UCLA Information Practices (IP) continues to work on your public records request dated March 2, 2018, herein enclosed. As required under Cal. Gov't Code Section 6253, and as promised in our letter to you of March 9, 2018, we are now able to provide you with the estimated date that responsive documents will be made available to you, which is June 29, 2018.

As the records are still being compiled and/or reviewed, we are not able at this time to provide you with any potential costs, so that information will be furnished in a subsequent communication as soon as it is known.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Salima Popat".

**Salima Popat**  
Senior Public Records Analyst, Information Practices  
(310) 794-8741 | (310) 794-8961 (fax) | [records@ucla.edu](mailto:records@ucla.edu)

Enclosure

**From:** [UCLA Public Records](#)  
**To:** [adam@thefire.org](mailto:adam@thefire.org)  
**Subject:** RE: Records request: Mnuchin appearance (18-5443)  
**Date:** Friday, June 29, 2018 8:36:41 PM  
**Attachments:**

---

Dear Mr. Adam B. Steinbaugh,

We apologize, but the review process has not yet been completed on the attached Public Records Act request of yours, and so we must revise the estimated availability date to August 31, 2018. Your patience is very much appreciated.

Best regards,

UCLA Information Practices  
[records@ucla.edu](mailto:records@ucla.edu)  
(310) 794-8741

**From:** [UCLA Public Records](#)  
**To:** [adam@thefire.org](mailto:adam@thefire.org)  
**Subject:** RE: Records request: Mnuchin appearance (18-5443)  
**Date:** Friday, August 31, 2018 6:00:35 PM  
**Attachments:**

---

Dear Mr. Adam B. Steinbaugh,

Unfortunately, we must revise the estimated availability date regarding your attached request, as the requisite review has not yet been completed. We expect to provide a response by November 30, 2018. We apologize for the delay.

Best regards,

UCLA Information Practices  
[records@ucla.edu](mailto:records@ucla.edu)  
(310) 794-8741

**From:** [UCLA Public Records](#)  
**To:** [adam@thefire.org](mailto:adam@thefire.org)  
**Subject:** RE: Records request: Mnuchin appearance (18-5443)  
**Date:** Friday, November 30, 2018 3:14:20 PM  
**Attachments:**

---

Dear Mr. Adam B. Steinbaugh,

Unfortunately, we must revise the estimated availability date regarding your attached request, as the requisite review has not yet been completed. We expect to provide a response by February 28, 2019. We apologize for the delay.

Best regards,

UCLA Information Practices  
[records@ucla.edu](mailto:records@ucla.edu)  
(310) 794-8741

**From:** [UCLA Public Records](#)  
**To:** [adam@thefire.org](mailto:adam@thefire.org)  
**Subject:** RE: Records request: Mnuchin appearance (18-5443)  
**Date:** Thursday, February 28, 2019 3:22:20 PM  
**Attachments:**

---

Dear Mr. Adam B. Steinbaugh,

Unfortunately, we must revise the estimated availability date regarding your attached request, as the requisite review has not yet been completed. We expect to provide a response by April 30, 2019. We apologize for the delay.

Best regards,

UCLA Information Practices  
[records@ucla.edu](mailto:records@ucla.edu)  
(310) 794-8741

# **EXHIBIT D**

1 Raymond A. Cardozo (SBN 173263)  
Email: rcardozo@reedsmith.com  
2 Le T. Duong  
Email: lduong@reedSmith.com  
3 REED SMITH LLP  
101 Second Street  
4 Suite 1800  
San Francisco, CA 94105-3659  
5 Telephone: +1 415 543 8700  
Facsimile: +1 415 391 8269

6 FAGEN FRIEDMAN & FULFROST, LLP  
7 Roy A. Combs, SBN 123507  
[rcombs@f3law.com](mailto:rcombs@f3law.com)  
8 Shiva E. Stein, SBN 215012  
[sstein@f3law.com](mailto:sstein@f3law.com)  
9 Jen Michael-Stevens, SBN 286646  
[jmichael-stevens@f3law.com](mailto:jmichael-stevens@f3law.com)  
10 1525 Faraday Avenue, Suite 300  
San Diego, California 92008  
11 Phone: 760-304-6000  
Fax: 760-304-6011

12 Attorneys for Respondent Regents of The  
13 University of California and erroneously named  
14 as University of California, Los Angeles

15 SUPERIOR COURT OF THE STATE OF CALIFORNIA

16 FOR THE COUNTY OF LOS ANGELES

17 FOUNDATION FOR INDIVIDUAL RIGHTS  
IN EDUCATION, INC., a nonprofit corporation,

18 Plaintiff,

19 vs.

20 REGENTS OF THE UNIVERSITY OF  
21 CALIFORNIA; UNIVERSITY OF  
CALIFORNIA, LOS ANGELES; and DOES 1  
22 THROUGH 5.,

23 Defendant.

No.: 19STCP01033

**RESPONDENTS' OFFER OF JUDGMENT**

24  
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28

1 TO PETITIONER FOUNDATION FOR INDIVIDUAL RIGHTS IN EDUCATION, INC.  
2 AND IT COUNSEL OF RECORD:

3 Respondent Regents of The University of California, for itself and erroneously sued as  
4 University of California, Los Angeles (collectively “UCLA”) offers to have judgment taken against it  
5 and for Petitioner on the above-entitled Petition for Writ of Mandate (“Petition”) pursuant to Section  
6 998 of the Code of Civil Procedure according to the terms and conditions set forth herein.

7 On March 2, 2018, Petitioner submitted a request to UCLA for copies of records as set forth  
8 on **Exhibit A** (the “Request”). In particular the Request sought:

- 9 1. A copy of any video of United States Secretary of the Treasury Steven Mnuchin  
10 speaking at the University of California, Los Angeles.  
11 2. A copy of any agreement or contract concerning Sec. Mnuchin’s appearance at  
12 UCLA.  
13 3. Any communications with Sec. Mnuchin or anyone acting on his behalf  
14 concerning the release or non-release of audio or video of Sec. Mnuchin’s  
15 appearance at UCLA.

16 2. UCLA offers to have judgment entered, finding:

- 17 a. The Request reasonably described identifiable records.  
18 b. Records responsive to Request No. 1 were made available by March 9, 2018.  
19 c. On about April 10, 2019, UCLA made available to Petitioner the records attached as  
20 **Exhibit B** in response to Request No. 3 and wrote Petitioner that there were no documents responsive  
21 to Request No. 2.

22 d. UCLA does not agree that the production of records responsive to Request No. 3  
23 resulted from the filing of the Petition. Nor does UCLA agree that the California Public Records Act,  
24 Government Code §6250 *et seq.*, permits a claim for undue delay in producing records or that the facts  
25 here constitute undue delay. Nonetheless, in the interests of avoiding further litigation and incurring  
26 further costs or attorney’s fees, UCLA offers to not contest those issues in this case only and offers to  
27 have judgment entered as follows:

28 In light of the scope of the requested records sought by Requests Nos. 2 and 3, UCLA  
failed to make the records responsive to Requests Nos. 2 and 3, to the extent they  
existed, available promptly within the meaning of California Government Code

1 §6253(b), and the timing of when the public records were made available to Petitioner  
2 objectively resulted in a delay of Petitioner’s inspection or copying of those records.

3 e. Based on the language of the judgment set forth immediately above, the Court may  
4 determine by noticed motion whether Petitioner is the prevailing party in litigation filed pursuant to  
5 Government Code §6259 and entitled to an award of reasonable attorney’s fees and costs.

6 In addition, UCLA agrees to stipulate to the following additional facts:

7 f. On March 9, 2018, UCLA wrote Petitioner a letter stating in part that “we require  
8 additional time to respond to your [March 2, 2018] request, due to the following circumstance(s): [X]  
9 The need to search for and collect the requested records from field facilities or other establishments  
10 that are separate from the office processing the request.” The office processing the request was  
11 UCLA’s Office of Information Practices, 10920 Wilshire Blvd., Ste 107, Los Angeles, CA  
12 90024. The March 9, 2018 letter stated an estimated extension date of March 26, 2018 by which a  
13 determination would be dispatched to Petitioner of whether the request, in whole or in part, sought  
14 copies of disclosable public records in the possession of the UCLA. UCLA’s March 9, 2018 letter  
15 did respond to Petitioner’s Request No. 1, stating: “at this time, pursuant to California Government  
16 Code section 6253, we are able to make the requested video available to you. UCLA received consent  
17 from the U.S. Treasury Department on March 9, 2018 to post the full video of Secretary Mnuchin’s  
18 recent presentation at UCLA to the Burkle Center’s website. The link to the video is now posted:  
19 <http://www.international.ucla.edu/burkle/multimedia/189606>. This link serves to complete our  
20 production in response to your request for the video of the event.”

21 g. On March 26, 2018, UCLA sent Petitioner a written determination stating June 26,  
22 2018 as an estimated date when the disclosable records would be made available to Petitioner. UCLA  
23 sent four subsequent communications extending the estimated date and time when the disclosable  
24 records would be made available, the last of which extended the estimated date when the disclosable  
25 records would be made available to April 30, 2019. Copies of those letters and the March 9, 2018  
26 letter written by UCLA are attached as **Exhibit C**.

27 h. Without admitting whether UCLA constitutes a “state or local agency” for purposes  
28 of California Government Code §6253.3, UCLA states that it did not allow another party to control

1 the disclosure of information in response to Petitioner's March 2, 2018 request.

2 If you accept this offer, please date and sign the accompanying notice of acceptance, and file  
3 the offer and notice of acceptance in the above-entitled action prior to trial or within 30 days after the  
4 offer is made, whichever occurs first, or else it will be deemed withdrawn.  
5

6 Dated: September 22, 2020

8 REGENTS OF THE UNIVERSITY OF  
9 CALIFORNIA

10 By:   
11 \_\_\_\_\_

12 Its: Senior Counsel, Office of the General Counsel  
13 University of California

14  
15 REED SMITH LLP

16  
17  
18   
19 \_\_\_\_\_  
20 Attorney for REGENTS OF THE UNIVERSITY OF  
21 CALIFORNIA sued in its own name and erroneously  
22 as UNIVERSITY OF CALIFORNIA, LOS ANGELES

23 Service on September 29, 2020 of the above offer to compromise is admitted.

24   
25 \_\_\_\_\_  
26 FOUNDATION FOR INDIVIDUAL RIGHTS IN  
27 EDUCATION, INC., a nonprofit corporation  
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**NOTICE OF ACCEPTANCE**

Petitioner Foundation for Individual Rights in Education, Inc., a nonprofit corporation, hereby accepts the Offer of Judgment of Regents of the University of California (“Respondent”) set forth above.

Dated: September 29, 2020



FOUNDATION FOR INDIVIDUAL RIGHTS IN EDUCATION, INC., a nonprofit corporation

LAW OFFICES OF KELLY A. AVILES



Attorney for Petitioner FOUNDATION FOR INDIVIDUAL RIGHTS IN EDUCATION, INC., a nonprofit corporation

Petitioner further acknowledges (without itself stipulating to them) Respondent’s stipulation to certain facts.

Dated: September 29, 2020



FOUNDATION FOR INDIVIDUAL RIGHTS IN EDUCATION, INC., a nonprofit corporation

LAW OFFICES OF KELLY A. AVILES



Attorney for Petitioner FOUNDATION FOR INDIVIDUAL RIGHTS IN EDUCATION, INC., a nonprofit corporation

1 **PROOF OF SERVICE**

2 I reside or work within in the County of Los Angeles, State of California. I am  
3 over the age of 18 and not a party to the within action. My business address is 1502  
4 Foothill Blvd., Suite 103-140, La Verne, CA 91750.

5 On **October 14, 2020**, I served the foregoing documents described as  
6 **[PROPOSED] STIPULATED JUDGMENT** on the parties in this action as listed in  
7 the attached service list by the following means:

8 **Service List**

9  
10 Jen Michael-Stevens  
11 Shiva Stein  
12 FAGEN FRIEDMAN & FULFROST, LLP  
13 6300 Wilshire Blvd, Suite 1700  
14 Los Angeles, CA 90048  
[jmichael-stevens@f3law.com](mailto:jmichael-stevens@f3law.com)  
[sstein@f3law.com](mailto:sstein@f3law.com)

Raymond A. Cardozo  
Le T. Duong  
REED SMITH LLP  
101 Second Street, Suite 1800  
San Francisco, CA 94105-3659  
[rcardozo@reedsmith.com](mailto:rcardozo@reedsmith.com)  
[lduong@reedsmith.com](mailto:lduong@reedsmith.com)

15 **Electronic Service**

16 In accordance with Code of Civil Procedure sections 1010.6 and 1013, California  
17 Rules of Court, Rule 2.251, an order of the court, and/or an agreement of the parties, I  
18 caused the documents to be sent to the person at the email address listed below via email  
19 or via an electronic filing provider. After transmission, I did not receive, within a  
20 reasonable period of time, any electronic message or other indication that the  
21 transmission was unsuccessful.

22 I declare under penalty of perjury under the laws of the State of California that  
23 the foregoing is true and correct.

24  
25 Date: October 14, 2020

\_\_\_\_\_  
/s/Albert D. Aviles  
Albert D. Aviles