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12 *Attorneys for Defendants*  
13 The Regents of the University of California and  
Michael V. Drake  
14

15 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
16 COUNTY OF ALAMEDA

17 CINDY KIEL, J.D., an Executive Associate  
Vice Chancellor at UC Davis, MCKENNA  
18 HENDRICKS, a UC Santa Barbara student,  
EDGAR DE GRACIA, a UCLA student, and  
19 LELAND VANDERPOEL, an employee at the  
Fresno satellite extension of the UCSF Medical  
20 Education Program, and FRANCES OLSEN,  
Professor of Law at UCLA,

21 Plaintiff,

22 v.

23 THE REGENTS OF THE UNIVERSITY OF  
24 CALIFORNIA, a Corporation, and MICHAEL  
V. DRAKE, in his official capacity as President  
25 of the UNIVERSITY OF CALIFORNIA,

26 Defendants.  
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*Exempt from Filing Fees:  
Government Code § 6103*

Case No. HG20072843  
Unlimited Civil Jurisdiction

ASSIGNED FOR ALL PURPOSES TO:  
Hon. Richard L. Seabolt  
Department 521

**DECLARATION OF BRAD H.  
POLLOCK, M.P.H., PH.D., F.A.C.E. IN  
SUPPORT OF DEFENDANTS'  
OPPOSITION TO PLAINTIFFS'  
MOTION FOR PRELIMINARY  
INJUNCTION**

Date: October 14, 2020  
Time: 01:30 p.m.  
Dept.: 521  
Reservation No.: 2206283

Complaint filed: August 27, 2020  
Trial: None set

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I, Brad H. Pollock, M.P.H., Ph.D., F.A.C.E. declare:

1. I provide this declaration in support of Defendants The Regents of the University of California and Michael V. Drake’s (“Defendants”) Opposition to Plaintiffs’ Motion for Preliminary Injunction. I base this declaration on my expertise as outlined below and facts within my personal knowledge, to which I could and would testify competently if called upon to do so.

2. I am a Professor of Public Health Sciences at the University of California (“UC”), Davis School of Medicine. I received my B.S. in Biological Sciences (Molecular Biology) from UC Irvine, and my Masters in Public Health (Epidemiology) and Ph.D. (Epidemiology; minor in Biostatistics) from the UCLA School of Public Health. In 2014, I joined the UC Davis School of Medicine as Professor and Chair of the Department of Public Health Sciences. Since 2017 I have also served as the Associate Dean for Public Health Sciences for the UC Davis School of Medicine. Before joining UC, I held appointments at the University of Florida College of Medicine (1988-2001) and University of Texas Health Science Center at San Antonio (2001-2014). A true and correct copy of my current curriculum vitae is attached as **Exhibit A**.

3. As relevant to this case, I am an experienced epidemiologist with 32 years of professional experience in the conduct of observational studies and clinical trials, ranging from etiologic research to identify risk factors for disease, to the conduct and evaluation of preventive and therapeutic intervention research studies. I have served as the Chair of the University of California System’s Public Health COVID-19 Working Group (“Working Group”) since March 2020. The first assignment of our Working Group was to develop UC System guidance to minimize transmission of SARS-CoV-2 on UC campuses by transiting to remote instruction and having all students who were able to leave the campus and return home. More recently, the Working Group supported the recommendation that led to the UC System’s influenza vaccine requirement. The requirement was intended to reduce harms to UC students, employees, and faculty that would be associated with an influenza outbreak during the COVID-19 pandemic on UC campuses.

4. I have reviewed the UC President’s Executive Order (“EO”), as originally issued and as amended, that is the subject of this action, including its flu vaccine mandate that goes into

1 effect November 1, 2020. From the public health perspective, I am in full support of this  
2 influenza vaccination mandate.

3 5. Other expert statements filed to support the Plaintiffs' motion for preliminary  
4 injunction refer to limited evidence from previous research indicating that the proven benefits of  
5 influenza vaccines that are stated to be modest, and that our understanding of the risk of adverse  
6 effects of influenza vaccination is insufficient. These statements are made in the context of  
7 systematic reviews of influenza vaccination research investigations that include various  
8 observational studies and vaccine prevention trials. The Plaintiffs' experts focus primarily on  
9 potential individual harms but downplay the individual benefits of vaccination including their  
10 significant impacts on of reducing hospital admissions and influenza-associated deaths while  
11 failing to fully weigh the incremental societal benefits that influenza vaccination confers to  
12 prevent transmission of influenza to others—the “public health” benefit.

13 6. In my opinion, Plaintiffs' experts fail to account for the current public health crisis  
14 – the COVID-19 pandemic caused by the SARS-CoV-2 virus -- in which another highly  
15 communicable acute respiratory virus with significant morbidity and mortality rages on. At  
16 present, the amount of healthcare resources needed to address the COVID-19 pandemic is low in  
17 many areas and is somewhat unpredictable based on the ebb and flow of the pandemic, with  
18 surges that cannot be precisely predicted. Without a significant influenza vaccination response  
19 this year, excess morbidity from influenza will place a greater strain on these healthcare resources  
20 increasing the likelihood that the public's access to needed healthcare will be limited and their  
21 health jeopardized. Healthcare resources in jeopardy include diagnostic testing capacity,  
22 emergency room capacity, hospital bed capacity, and within hospitals, intensive care unit (ICU)  
23 bed capacity. Additional potentially preventable influenza cases would likely place a significant  
24 incremental strain on current healthcare resources.

25 7. In my opinion, the societal benefits combined with the individual benefits of  
26 influenza vaccination provide strong support for the UC influenza vaccination requirement to  
27 reduce the risk of influenza transmission on UC campuses during the COVID-19 pandemic.  
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Executed in Davis, California, on this 29th day of September 2020.



Digitally signed by Brad H. Pollock  
Date: 2020.09.29 15:16:13 -07'00'

Brad H. Pollock, M.P.H., Ph.D.

SFACTIVE-905806882.6

# EXHIBIT A

## CURRICULUM VITAE

Brad H. Pollock, M.P.H., Ph.D., F.A.C.E.  
Professor and Chairman  
Rolkin Chair in Public Health Sciences  
Department of Public Health Sciences,  
Associate Dean for Public Health Sciences  
School of Medicine  
Medical Sciences 1C, Room 104  
One Shields Avenue  
University of California, Davis,  
Davis, CA 95616

Date of Preparation: September 25, 2020

### I. GENERAL INFORMATION

#### A. Education:

1988 Ph.D.	Epidemiology (minor in Biostatistics)	University of California, Los Angeles, School of Public Health
1981 M.P.H.	Epidemiology	University of California, Los Angeles, School of Public Health
1979 B.S.	Biological Sciences (Molecular Biology)	University of California, Irvine

#### B. Postgraduate Training:

2019 – present	Association of Schools & Programs of Public Health (ASPPH) Academic Public Health Leadership Institute (APHLI)
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#### C. Academic Appointments:

7/2017 – present	Professor, Step IX.5	Division of Epidemiology and Division of Biostatistics, Department of Public Health Sciences, School of Medicine, University of California, Davis
7/2017 – present	Associate Dean for Public Health Sciences	School of Medicine, University of California, Davis

9/2015 – present	Adjunct Professor	Department of Epidemiology and Biostatistics, School of Medicine, University of Texas Health at San Antonio
9/2014 – present	Chairman	Department of Public Health Sciences, School of Medicine, University of California, Davis
9/2014 – present	Endowed Chair	Arline Miller Rolkin Chair in Public Health Sciences
9/2014 – 6/2017	Professor, Step VIII	Division of Epidemiology, Department of Public Health Sciences, School of Medicine, University of California, Davis
1/2009 – 9/2014	Endowed Chair	Henry B. Dielmann Distinguished University Chair, University of Texas Health Science Center at San Antonio
6/2006 – 9/2014	Founding Chairman	Department of Epidemiology and Biostatistics, School of Medicine, University of Texas Health Science Center at San Antonio
12/2006 – 9/2014	Professor	Department of Surgery, University of Texas Health Science Center at San Antonio
9/2006 – 9/2014	Adjunct Professor	Department of Management Sciences and Statistics, College of Business, University of Texas at San Antonio
5/2003 – 9/2014	Adjunct Professor	School of Public Health, University of Texas Health Science Center at Houston
8/2001 – 5/2006	Center Director	Center for Epidemiology and Biostatistics, University of Texas Health Science Center at San Antonio
8/2001 – 7/2011	Associate Director	Cancer Prevention and Control, Cancer and Therapy Research Center, University of Texas Health Science Center at San Antonio
8/2001 – 12/2006	Deputy Director	Children’s Cancer Research Institute, University of Texas Health Science Center at San Antonio
8/2001 – present	Professor	Department of Pediatrics, University of Texas Health Science Center at San Antonio
8/2001 – present	Professor	Department of Medicine, University of Texas Health Science Center at San Antonio

8/2001	Tenure	Department of Pediatrics, University of Texas Health Science Center at San Antonio
7/2001 – 10/2001	Professor	Department of Health Policy and Epidemiology, University of Florida College of Medicine, Gainesville, FL
3/2000 – 8/2001	Interim Chair	Department of Health Policy and Epidemiology, University of Florida College of Medicine, Gainesville, FL
9/1999 – 3/2000	Acting Chair	Department of Health Policy and Epidemiology, University of Florida College of Medicine, Gainesville, FL
10/1999 – 8/2001	Associate Director	Cancer Control, University of Florida/Shands Cancer Center, Gainesville, FL
7/1996	Tenure	Department of Health Policy and Epidemiology, University of Florida College of Medicine, Gainesville, FL
7/1994 – 6/2001	Associate Professor and Chief	Division of Epidemiology, Department of Health Policy and Epidemiology, University of Florida College of Medicine, Gainesville, FL
7/1993 – 6/1994	Associate Research Professor	Department of Pediatrics, University of Florida College of Medicine, Gainesville, FL
7/1993 – 7/2001	Affiliate Assistant Professor	Department of Statistics, College of Liberal Arts and Sciences, University of Florida, Gainesville, FL
7/1993 – 7/2001	Affiliate Assistant Professor	Department of Pathology and Laboratory Medicine, University of Florida College of Medicine, Gainesville, FL
4/1988 – 6/1993	Assistant Research Professor	Division of Epidemiology and Biostatistics, Department of Pediatrics, University of Florida College of Medicine, Gainesville, FL
11/1980 – 9/1987	Research Associate	Division of Cardiology, Cedars-Sinai Medical Center, Los Angeles, CA

**D. Honors and Awards:**

- 2019 Society of Clinical Research Associates (SOCRA)  
President's Award for Distinguished Service
- 1989 Delta Omega Honorary Public Health Society



- 1977 California State Scholarship
- 1976 University of California Alumni Scholarship
- 1975 L.A. Valley College Biology Department Scholarship
- 1975 University of California Faculty Alumni Scholarship

## II. RESEARCH

### A. Bibliography:

#### 1. Books and/or Chapters:

##### **Book Chapters**

1. Michalek, J.E.; Cornell, J.E.; Pollock, B.H.: Understanding the Elements that Comprise Evidence-Based Medicine. In: Cohn S.M., Brower, S.T. (ed.) Surgery: Evidence-Based Practice: People's Medical Publishing House-USA, 2012, pp. 1000.
2. Pollock, B.H.; Tomlinson, G.E.: Preventing Cancer in Adulthood: Advice for Pediatricians. in: Pizzo, P.A.; Poplack, D.G. (eds.) Principles and Practice of Pediatric Oncology, 6<sup>th</sup> edition. Philadelphia: Lippincott Williams & Wilkins, 2010, pp. 1474
3. Pollock, B.H.: Why Evidence-Based Medicine? In: Cohn S. (ed.) Acute Care Surgery and Trauma: Evidenced-Based Practice. London, England: Informa Healthcare, 2009, pp. xvii - xx.
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5. Pollock, B.H.; Knudson, A.G.: Preventing Cancer in Adulthood: Advice for Pediatricians. In: Pizzo, P.A.; Poplack, D.G. (eds.) Principles and Practice of Pediatric Oncology, 5<sup>th</sup> edition. Philadelphia: Lippincott Williams & Wilkins, 2006, pp. 1617–1628.
6. Pollock, B.H.; Knudson, A.G.: Preventing Cancer in Adulthood: Advice for Pediatricians. in: Pizzo, P.A.; Poplack, D.G. (eds.) Principles and Practice of Pediatric Oncology, 4<sup>th</sup> edition. Philadelphia: Lippincott Williams & Wilkins, 2002, pp. 1553–1563.
7. Jenson, H.B.; Pollock, B.H.: Cardiac Cancer in HIV-Infected Patients. in: Lipshultz, S. (ed.) Cardiovascular Manifestations of HIV Infection. New York: Chapman & Hall, 1998, pp. 255–263.
8. Pollock, B.H.; Knudson, A.G.: Preventing Cancer in Adulthood: Advice for Pediatricians. in: Pizzo, P.A.; Poplack, D.G. (eds.) Principles and Practice of Pediatric Oncology, 3<sup>rd</sup> edition. Philadelphia: Lippincott-Raven, 1996, pp. 1421–1435.

2. Papers published:

**Refereed Publications**

1. Oster, R.A.; Devick, K.L.; Thurston, S.W.; Larson, J.L.; Welty, L.J.; Nietert, P.J.; Pollock, B.H.; Pomann, G-M.; Spratt, H.; Lindsell, C.J.; Enders, F.T.: Learning gaps among statistical competencies for clinical and translational science learners, *J Clin Translational Sci* (in press).
2. Hanson, H.A.; Leiser, C.L.; Bandoli, G.; Pollock, B.H.; Karagas, M.R.; Armstrong, D.; Dozier, A.; Weiskopf, N.G.; Monaghan, M.; Davis, A.M.; Eckstrom, E.; Weng, C.; Tobin, J.N.; Kaskel, F.; Schleiss, M.R.; Szilagyi, P.; Dykes, C.; Cooper, D.; Barkin, S.L.: Charting the life course: emerging opportunities to advance scientific approaches using life course research *J Clin Translational Sci* (in press).
3. Cooper, D.M.; Guay-Woodford, L.; Blazar, B.R.; Bowman, S.; Byington, C.L.; Dome, J.; Forthal, D.; Konstan, M.W.; Kuppermann, N.; Liem, R.I.; Ochoa, E.R., Jr; Pollock, B.H.; Price, O.A.; Ramsey, B.W.; Ross, L.F.; Sokol, R.J.; Wright, R.J.: Re-opening schools safely: the case for collaboration, constructive disruption of pre-COVID expectations, and creative solutions. *J Pediatr* (in press).
4. Dickens D.S.; Roth, M.; Pollock, B.H.; Anne Marie Langevin, A. M: Understanding the barriers to pediatric oncologist engagement and accrual to clinical trials in National Cancer Institute-designated Community Oncology Research Programs *JCO Oncol Practice* (in press).
5. Alvarez, E.M.; Malogolowkin, M.; Hoch, J.S.; Li, Q.; Brunson, A.; Pollock, B.H.; Muffly, L.; Wun, T.; Keegan, T.H.M.: Treatment complications and survival among children and young adults with acute lymphoblastic leukemia. *JCO Oncol Pract* 2020, (in press).
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9. Roth, M.E.; Unger, J.M.; O'Mara, A.M.; Lewis, M.A.; Budd, T.; Johnson, R.H.; Pollock, B.H.; Freyer, D.R.: Enrollment of adolescents and young adults onto SWOG clinical trials: a comparative analysis by treatment site and era study. *Cancer Medicine* 2020, vol. 9, pp. 2146-2152.
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### Non-Refereed Publications

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2. Pollock, B.H.: Ph.D. Dissertation: *Prognostic Testing in Coronary Artery Disease*. University Microfilms Service Dissertation Information Service, Ann Arbor MI, 1988.

### 3. Abstracts:

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4. Other:
- “The Future of Public Health in Texas 2005,” Task Force on the Future of Public Health in Texas, University of Texas System, 2005.
- Potter, L. B., Sparks, C., & Pollock, B. (2016, September 22). Recent Trends and Characteristics Associated with Influenza Vaccination Disparities among Texas Children. Open Science Framework. Retrieved from [osf.io/preprints/socarxiv/8mnwv](https://osf.io/preprints/socarxiv/8mnwv)
5. Papers Submitted:
1. Eisenman, D.P.; Wiley, D.J.; Pollock, B.H.; Rutherford, G.W.; Rimoin, A.W.; Bibbins-Domingo, K.; Checkoway, H.; Fielding, J.; Waters, C.; Reingold, A.; Boden-Albala, B.; Goosby, E.; Dawson-Rose, C.: Recommendations for demonstrators, law enforcement and public health agencies for reducing SARS-CoV-2 transmission during civil protests.
  2. Xue, K.; Tang, L.; Shen, C-L.; Pollock, B.H.; Guerra, F.; Phillips, T. D.; Wang, J.-S.: Increase in aflatoxin exposure in two populations residing in East and West Texas, United States
6. Papers in Preparation:
1. Siembida, E.J.; Loomans-Kropp, H.A.; Freyer, D.; Sung, L.; Crosswell, H.; Pollock, B.H.; Tami-Maury, I.; Roth, M.E.: Barriers and facilitators to adolescent and young adult cancer trial enrollment at NCORP sites.
  2. Guerra-Shinohara, E.M.; Paniz, C.; Gomes, G.W.; Green, R.; Pollock, B.H.; Ferreira, M.A., Jr.; Jarcem, K.G.; Lucena, M.R.; Perdomo, R.T.; Pereira, I.C.; Figueiredo, S.M.: Evolution of COVID-19 in Brazil: analysis of general data and future perspectives.

### **Refereed Presentations**

1. "Reduction of aflatoxin bioavailability with ACCS<sub>100</sub> in an exposed South Texas population," Sept. 28, 2015, American College of Epidemiology Annual Meeting, Atlanta, GA.
2. "Case-Control Study of Pediatric HIV-Related Malignancies," Third Annual Florida Epidemiology Meeting, July 25, 1997, Miami Beach, FL.
3. "Do Clinical Prediction Rules Really Mean What They Say?" Annual Meeting of the American Federation for Clinical Research, 1987, San Diego, CA.
4. "Is Diagnosis More Accurate Than Prognosis?" Annual Meeting of the American Heart Association, 1986, Anaheim, CA.
5. "Heuristic and Algorithmic Interpretation of Cardiac Stress Tests," Annual Meeting of the American Association of Medical Informatics, 1986, Los Angeles, CA.
6. "Accuracy of a Heuristic Computer Program for the Diagnosis of Coronary Artery Disease." Annual Meeting of the American Federation for Clinical Research, 1986, Washington, DC.
7. "How Difficult is it to Predict the Future?" Annual Meeting of the American Federation for Clinical Research, 1986, Washington, DC.
8. "Extent and Severity of Myocardial Hypoperfusion as Independent Indices of Prognosis." Annual Meeting of the American Heart Association, 1985, Dallas, TX.
9. "Prognostic Accuracy Depends On Both the Patient and the Test." Annual Meeting of the American Heart Association, 1985, Dallas, TX.
10. "Accurate Computer Assessment of Clinical Coronary Artery Disease." Annual Meeting of the Society for Medical Decision Making, 1982, Boston MA.

### **Invited Presentations**

#### **International**

1. "The Process, The Opportunities, The Challenges of Research in the New Trauma Center," First Clinical Research in Emergency, Trauma and Critical Care Workshop, Hamad General Hospital, February 25, 2013, Doha, Qatar.
2. "From Bench-to-Bedside and Back: Clinical Translational Trauma Research," First Qatar Surgical Society Symposium and Third Annual Advanced Trauma Life Support (ATLS) for Middle East and North Africa (MENA) Conference, Hamad General Hospital, February 27, 2013, Doha, Qatar.
3. "Research Infrastructure to Support Emergency Department/Trauma Research: Data Operations," First Qatar Surgical Society Symposium and Third Annual Advanced Trauma Life Support (ATLS) for Middle East and North Africa (MENA) Conference, Hamad General Hospital, February 27, 2013, Doha, Qatar.
4. "Registration/Classification, International Working Group on Adolescents, Teenagers and Young Adults," Society for International Pediatric Oncology, Annual Meeting, Oct. 5, 2008, Berlin, Germany.