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

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

25 Plaintiffs,

26 vs.

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

Defendants.

CASE NO. HG 20072843

**PLAINTIFF MCKENNA HENDRICKS'
DECLARATION IN SUPPORT OF
PLAINTIFFS' MOTION FOR A
PRELIMINARY INJUNCTION**

UNLIMITED CIVIL JURISDICTION

DEPARTMENT 511

Date: October 14, 2020

Time: 1:30 PM

Reservation ID- 2206283

Action Filed: August 27, 2020

Trial Date: None Set

I, McKenna Hendricks, declare as follows:

1. I submit this declaration in support of Plaintiffs' Motion for a Preliminary Injunction.

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2. I have personal knowledge of the facts set forth below, and if called to testify, I could competently testify as follows:
3. I am a twenty-year-old student at UCSB and am in good health. I exercise four to five days a week and eat healthy on a consistent basis. I also drink plenty of water, avoid any drugs and alcohol, and try to spend plenty of time outside and move around frequently.
4. Growing up, I would get sick every time my mom took me to get a flu shot. Therefore, I have not received the flu shot in many years. I gave the vaccine another chance in October of 2019 and once again fell ill shortly after. Every experience I have had with the flu shot has been negative and I do not wish to subject myself to another. Every year I had not received a flu shot, I did not contract any sickness (flu or other).
5. I am confident in my body's ability to protect myself against infectious diseases and prefer to rely on my own strong immune system, rather than subjecting myself to chemicals and artificial immunity. I do not wish to risk immunosuppression and sensitize my body to a possible pathogen, but instead work to build long-term, active immunity.
6. I am also wary of the efficiency of the flu vaccine, as experts can only predict what the strain will be each flu season. This does not guarantee the vaccine would work. I do not believe a mandatory flu shot would protect anyone from the current pandemic at hand that is unrelated to the flu.
7. Not only is there little proof that flu vaccines are effective, but they contain many harmful chemicals, including but not limited to formaldehyde, ammonium sulfate, phenol, monosodium glutamate, and ethyl mercury.
8. Chancellor Henry T. Yang recently announced that all courses for the upcoming fall quarter will be offered through remote instruction, except for a small number of laboratory courses


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and performing arts courses. As of now, the flu vaccine is still required by November 1 of this year, with no change in the policy regarding classes being all online.

9. I have been fully compliant with the UC vaccine mandate, as I was required to get them over the years for public school as well. I feel as though my right to control what I put in body is being encroached, as my health is my responsibility.

10. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration was executed on September 10, 2020 in Santa Barbara, California.



McKenna Hendricks