

1 Richard Jaffe, Esq.
2 State Bar No. 289362
3 770 L Street, Suite 950
4 Sacramento, California 95814
5 Tel: 916-492-6038
6 Fax: 713-626-9420
7 Email: rickjaffeesquire@gmail.com

8 Robert F. Kennedy Jr., Esq.
9 (Subject to *pro hac vice*
10 admission) Children's Health
11 Defense 1227 North Peachtree
12 Parkway Peachtree, Georgia 30269
13 Tel: 917-743-3868

14 Attorneys for the Plaintiffs

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

17 CINDY KIEL, J.D., an Executive Associate
18 Vice Chancellor at UC Davis, MCKENNA
19 HENDRICKS, a UC Santa Barbara student,
20 EDGAR DE GRACIA, a UCLA student, and
21 LELAND VANDER POEL, 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 LELAND VANDER
POEL'S DECLARATION IN SUPPORT
OF PLAINTIFFS' MOTION FOR A
PRELIMINARY INJUNCTION**

BY FAX

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

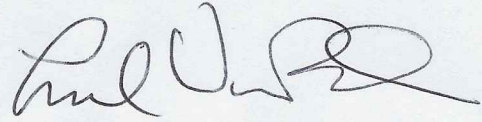
I, Leland Vander Poel, declare as follows:

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 sixty-two-year-old employee at UCSF Fresno Medical Education Program and am in good health. I exercise four to five days a week. I am a twenty-five year plus lacto-ovo vegetarian. I am a non-smoker and non-drinker. I eat mainly organic and non-GMO fresh fruits and vegetables.
4. I have enjoyed good health throughout my life. I am rarely sick. I proactively manage my stress with wellness techniques such as meditation and nutrition. On occasions when I do feel like I'm coming down with something, I take proactive measures to get rest and recuperate rapidly. Usually without aid of over the counter remedies.
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 efficacy and safety 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. I have enjoyed a thirteen year plus career at UCSF Fresno and hope to continue to do so.

1 9. I declare under penalty of perjury under the laws of the State of California that the foregoing
2 is true and correct and that this declaration was executed on September 14, 2020 in Fresno,
3 California.

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7 Leland Vander Poel