

**From:** [Hawkins, Marisa](#)  
**To:** [Horowitz, Cara](#); [Carlson, Ann E.](#)  
**Cc:** [Baldrige, Robert](#); [Donmez, Ayse](#)  
**Subject:** Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)  
**Date:** Thursday, March 01, 2018 12:01:45 PM  
**Attachments:** [Request \(18-5367\).PDF](#)  
[Emails - Guidelines re Collection for Production.pdf](#)

---

Dear Professor Horowitz and Professor Carlson,

My name is Marisa Hawkins and I am a staff member at UCLA Information Practices, working under Robert Baldrige. Mr. Baldrige recommended that I reach out to you because we recently received the attached request under the California Public Records Act (CPRA) from Christopher C. Horner, a Senior Fellow at the Competitive Enterprise Institute.

The request is somewhat involved, so I have summarized it below. Briefly, it is seeking:

- 1. Emails to or from Professor Horowitz and/or Professor Carlson, dated March 1, 2016 through April 30, 2016, meeting any of the following criteria:**
  - a. That are to or from Shaun Goho; or
  - b. That contain any of the following terms:
    - i. Harvard
    - ii. Pawa
    - iii. Frumhoff
    - iv. UCS
    - v. Eubanks
    - vi. CIEL
- 2. Emails to or from Professor Horowitz and/or Professor Carlson, dated December 1, 2017 through January 31, 2018, meeting any of the following criteria:**
  - a. That relate to an event (date not specified by the requester) at UCLA, which followed up on an April 25, 2016 event at Harvard Law School; or
  - b. That contain any of the following terms:
    - i. Frumhoff
    - ii. McKibbon
    - iii. Kimmell
    - iv. Union of Concerned Scientists
    - v. UCS
    - vi. @ucsusa.org

Would you be able to provide any responsive emails to any or all of the above requests?

Please know that the Office of Legal Affairs (OLA) is already aware of this request and that any responsive records provided will be thoroughly reviewed and vetted with the input of OLA and redacted and/or withheld where possible, pursuant to the legal exemptions to disclosure under CPRA.

For your reference, I have included our guidelines regarding the collection and forwarding of

responsive emails. Please feel free to contact me if you have any questions or concerns.

Best regards,

**Marisa Hawkins**

Senior Public Records Analyst

UCLA Information Practices

(310) 206-4159

[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

1310 I Street, NW, 7th Floor  
Washington, DC 20005  
cei.org

202 331 1010 *voice*  
202 331 0640 *fax*



## REQUEST UNDER CALIFORNIA'S PUBLIC RECORDS ACT

February 5, 2018

Records Management & Information Practices  
10920 Wilshire Boulevard  
Suite 530  
Los Angeles, CA 90024-6541

**BY ELECTRONIC MAIL** — [records@ucla.edu](mailto:records@ucla.edu)

UCLA Records Management Officer,

On behalf of the Competitive Enterprise Institute (CEI), a non-profit public policy institute in Washington, DC and pursuant to the California Government Code §§ 6250 *et. seq.*, please provide us within 10 business days copies of certain described *information*, as follows:

I. copies of all correspondence and its accompanying information<sup>1</sup>, including also any attachments, that were sent by, sent to (including copying, whether as cc: or bcc:) or otherwise were received or are possessed by UCLA School of Law's **Cara Horowitz**, and/or **Ann Carlson**, dated from **March 1, 2016 to April 30, 2016**, inclusive, which are also:

- a) to or from Shaun Goho, *and/or*
- b) which use any of the following terms, *anywhere* in the correspondence be it the to, from, cc, bcc, and/or Subject fields and/or body of the email: i) Harvard, ii) Pawa, iii) Frumhoff, iv) UCS, v) Eubanks, and/or vi) CIEL (these terms are not case sensitive).

---

<sup>1</sup> This includes public records, and associated public information, see discussion of Data Delivery Standards, *infra*.



Public records show that Professor Horowitz participated in an April 25, 2016 briefing at Harvard Law School on “Potential Causes of Action Against Major Carbon Producers: Scientific, Legal and Historical Perspectives”, attended by other academics, environmentalist pressure group activists, private attorneys and public employees of various state attorney general offices. The agenda listed the participating UCLA faculty in their capacity as UCLA faculty. Other participants blogged about the event, with one publishing, in relevant part, “We were joined by a superb set of panelists, including ...Cara Horowitz, co-director of the Emmett Center on Climate Change and the Environment at UCLA Law School”. We seek correspondence relating to this trip, presentation, and other assistance provided Prof. Horowitz and/or her colleague Ms. Carlson to the extent this information was produced or received using University resources.

II. Similarly, UCLA held a followup event, moderated by Ms. Horowitz with the participation of Prof. Carlson specifically as “Shirley Shapiro professor of environmental law, and inaugural faculty director of the Emmett Institute on Climate Change and the Environment, UCLA School of Law” (not as an industry consultant). We also seek correspondence relating to this event, specifically from or to (whether as to, cc or bcc), or using, *anywhere* in the correspondence be it the to, from, cc, bcc, Subject fields or body of the email: a) **Frumhoff**, b) **McKibben**, c) **Kimmell**, d) **Union of Concerned Scientists**, and/or e) **UCS** (including but not limited to in e.g., @ucsusa.org).

Records responsive to *this* request will be dated during a now-month period **December 1, 2017 through January 31, 2018, inclusive**. Again, we seek entire email “threads” containing



any record responsive to this request regardless whether any part of that thread falls outside the search parameter.

**Please consider as responsive entire email “threads”** containing any information responsive to this request, regardless whether any part of that thread falls outside the cited search parameters.

**We request records on the University’s system**, e.g., its backend logs, not those which survive on a faculty member’s own machine or account.

**We do not demand your Office produce requested information in any particular form, instead we request records in their native form, with specific reference to the U.S. Securities and Exchange Commission Data Delivery Standards.<sup>2</sup>** The covered information we seek is electronic information, this includes electronic *records*, and other public *information*.

To quote the SEC Data Delivery Standards, “Electronic files must be produced in their native format, i.e. the format in which they are ordinarily used and maintained during the normal course of business. For example, an MS Excel file must be produced as an MS Excel file rather than an image of a spreadsheet. *(Note: An Adobe PDF file is not considered a native file unless the document was initially created as a PDF.)* (emphases in original).

In many native-format productions, certain public information remains contained in the record (e.g., metadata). Under the same standards, to ensure production of all information requested, if your production will be de-duplicated it is vital that you 1) preserve any unique

---

<sup>2</sup> <https://www.sec.gov/divisions/enforce/datadeliverystandards.pdf>.



metadata associated with the duplicate files, for example, custodian name, and, 2) make that unique metadata part of your production.

Native file productions may be produced without load files. However, native file productions must maintain the integrity of the original meta data, and must be produced as they are maintained in the normal course of business and organized by custodian-named file folders. A separate folder should be provided for each custodian.

In the event that necessity requires your Office to produce a PDF file, due to your normal program for redacting certain information and such that native files cannot be produced as they are maintained in the normal course of business, in order to provide all requested information each PDF file should be produced in separate folders named by the custodian, *and* accompanied by a load file to ensure the requested information appropriate for that discrete record is associated with that record. The required fields and format of the data to be provided within the load file can be found in Addendum A of the above-cited SEC Data Standards. All produced PDFs must be text searchable.

In the context of our experience with responsive agencies taking the effort to physically print, then (often, poorly) scan *electronic* mail into (typically, non-searchable) PDF files, we note that production of electronic records necessitates no such additional time, effort or other resources, and no photocopying expense. Any such effort as described is most reasonably viewed as an effort to frustrate the requester's use of the public information.



We understand we owe the office the cost of material, required to satisfy this request. We agree to pay legitimate expenses up to \$150.00. If you estimate costs will exceed that please notify us immediately and break down the expected costs.

The undersigned do not seek the information for a commercial purpose. CEI is organized and recognized by the Internal Revenue Service as a 501(c)3 educational organization. As such, it has no commercial interest possible in these records.

Also, CEI is a media organization, which the federal government has already acknowledged is the case for purposes of the federal FOIA.<sup>3</sup>

As such, we request a waiver of any fees involved, as release of these records is in the public interest and the Office is permitted to and does exercise discretion in waiving or reducing fees on that basis.

The campaign in which Profs. Carlson and Horowitz have involved themselves and the School using, and were invited to participate and is listed as participating in the Harvard event on the basis of, their UCLA credential<sup>4</sup>, is the subject of intense public, media, congressional oversight and now judicial interest — which is indeed a principal objective of the campaign.<sup>5</sup> It

---

<sup>3</sup> See e.g., Department of the Treasury FOIA Nos. 2012-08-053, 2012-08-054.

<sup>4</sup> See attached public record obtained from the Vermont Office of Attorney General, after judicial determination in December that this public record is not conceivably subject to any privilege.

<sup>5</sup> See, e.g., John O'Brien, "Exxon Prepares To Sue California Cities, Says They Contradict Themselves On Climate Change", *Forbes*, January 8, 2018, <https://www.forbes.com/sites/legalnewsline/2018/01/08/exxon-prepares-to-sue-california-cities-say-they-contradict-themselves-on-climate-change/amp/>; Andrew Scurria, "California Municipalities' Debt Disclosures Contrast With Climate Warnings", *Wall Street Journal*, January 8, 2018, <https://www.wsj.com/articles/california-municipalities-debt-disclosures-contrast-with-climate-warnings-1515456551>; see also <https://www.courthousenews.com/wp-content/uploads/2018/01/ExxonDepositions.pdf>.

1310 L Street, NW, 7th Floor  
Washington, DC 20005  
cei.org

202.331.1010 *voice*  
202.331.0640 *fax*



involves third-parties and plainly no relevant privilege with the exception of possible personal contact information if that information is not already posted on the websites of various participating universities, pressure groups and the like. The requested information is of critical importance to the nonprofit policy advocacy groups engaged on these relevant issues, news media covering the issues, and others concerned with government activities on this critical subject, or as the United States Supreme Court once noted in the context of the federal FOIA, what their government, which under open records laws includes publicly funded academic institutions, is up to.

If you have any questions please do not hesitate to contact me. We look forward to your timely response.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "C. Horner", with a long horizontal flourish extending to the right.

Christopher C. Horner  
Senior Fellow, CEI  
1310 L Street, NW, 7th Floor  
Washington D.C. 20007  
[chris.horner@cei.org](mailto:chris.horner@cei.org)  
202.262.4458

## **Emails: Guidelines Regarding Collecting and Forwarding**

Please search your folders for any responsive emails, including archived folders/emails, and then provide them to us, preferably as attachments to a single email or, if too voluminous for that, as an Outlook PST file saved on a CD or flash drive. If you need help with searching and retrieving the emails, either your IT department or someone from my department will be able to assist you. Please know that all emails will be thoroughly reviewed by our department and Campus Counsel to see if any legal exemptions exist to prevent disclosure, (such as attorney-client privilege, or Academic Freedom regarding scholarly research, among others).

**If simply forwarding emails**, it is preferable that you **not** forward each one individually, as we would then not be able to print out and/or PDF/save each email without having it now include us in the correspondence (from you, to us), and so that portion would then have to be redacted back out of what is produced. Therefore, please use the method as seen in the attachment: "Guide to Forwarding Emails as Attachments to a Single Email," which provides screenshots and simple instructions.

As noted, if the amount of emails is too voluminous to forward as attachments to one or more emails, then creating a PST file in Outlook might be the best way to go...

**If creating a PST file:** In case you're not familiar with how to create a PST file to export your emails, the following link provides step-by-step instructions with pictures: <http://office.microsoft.com/en-us/outlook-help/export-outlook-items-to-an-outlook-data-file-pst-HA102534110.aspx>. We have also provided the steps below:

On the main Outlook screen click 'File' tab then select 'Options'

1. Click 'Advanced'
2. Under the export section click 'Export'
3. Select 'Export to a file' then click 'Next'
4. Select "Outlook Data File (.pst)" then click 'Next'
5. Select the desired folder and click 'Next'
6. Save the file to a location you'll be able to find later then click 'Finish'  
\*optional\* add a password and click 'OK'

Upload the created PST file to a CD or flash drive and then forward that to the attention of the Information Practices staff member handling the matter. If using Campus Mail, send it to the person's attention at Records Management and Information Practices, Wilshire Center, Suite 530. Mail code: 143348.

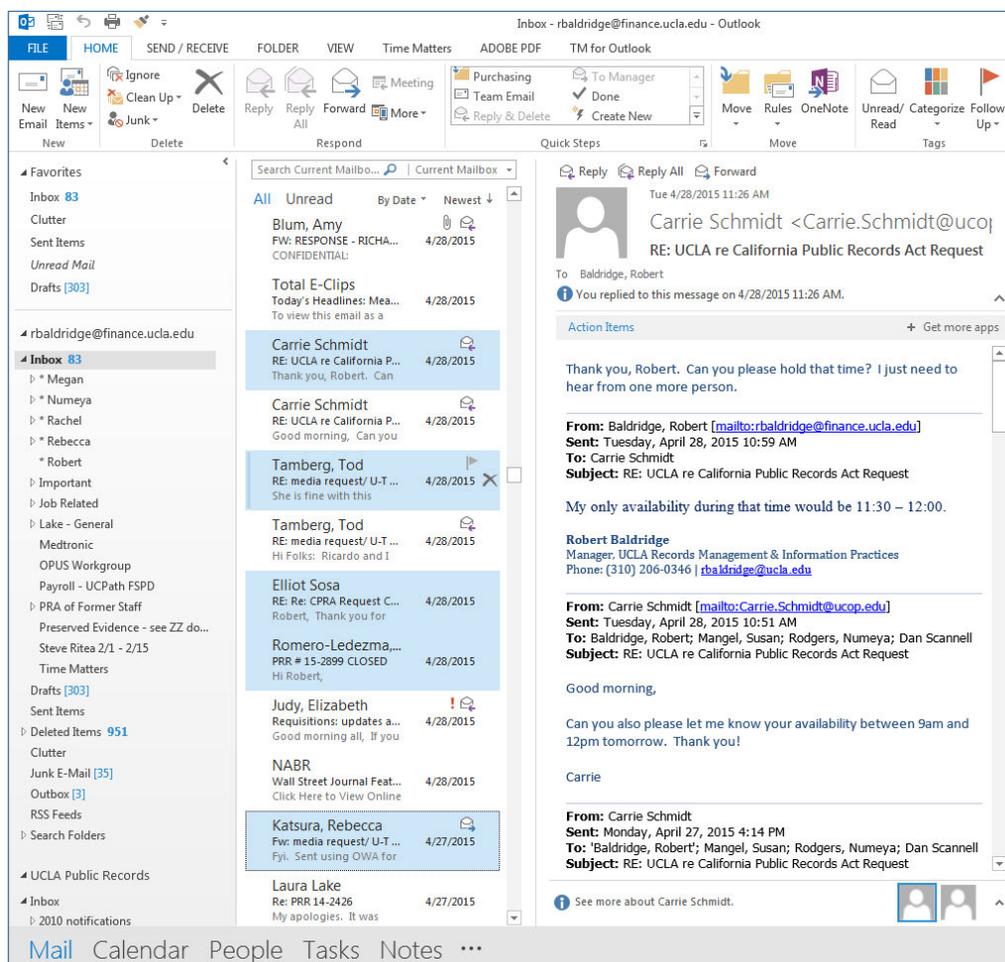
## Forwarding Emails as Attachments to a Single Email

As noted, if simply forwarding emails, it is preferable that you **not** forward each one individually, as I would then not be able to print out and/or PDF/save each email without having it now include me in the correspondence (from you, to me), and so that portion would then have to be redacted back out of what is produced. Therefore, please use the following method, which will be less time-consuming for both of us:

### Instructions for attaching emails to a single email:

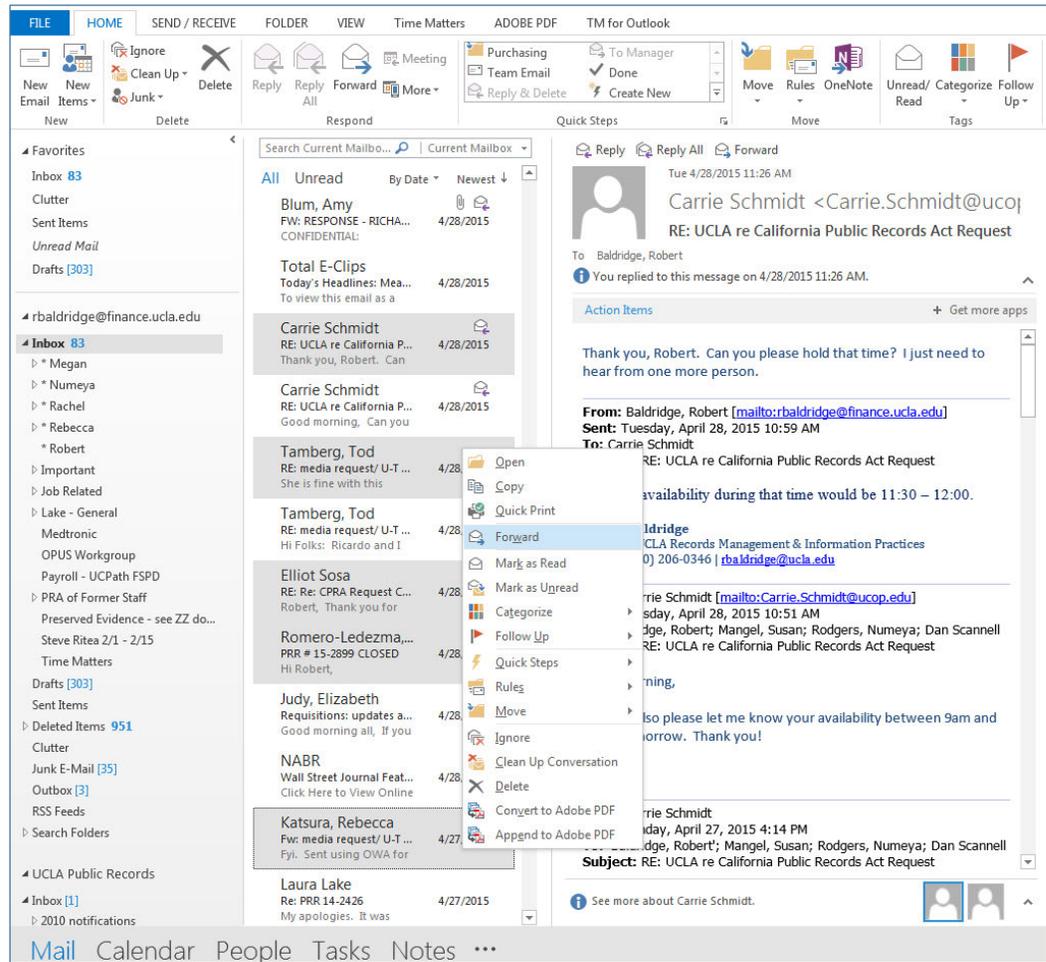
#### Step 1:

While holding down the “Ctrl” key click on each responsive email, which will leave you with highlighted emails, as seen here:



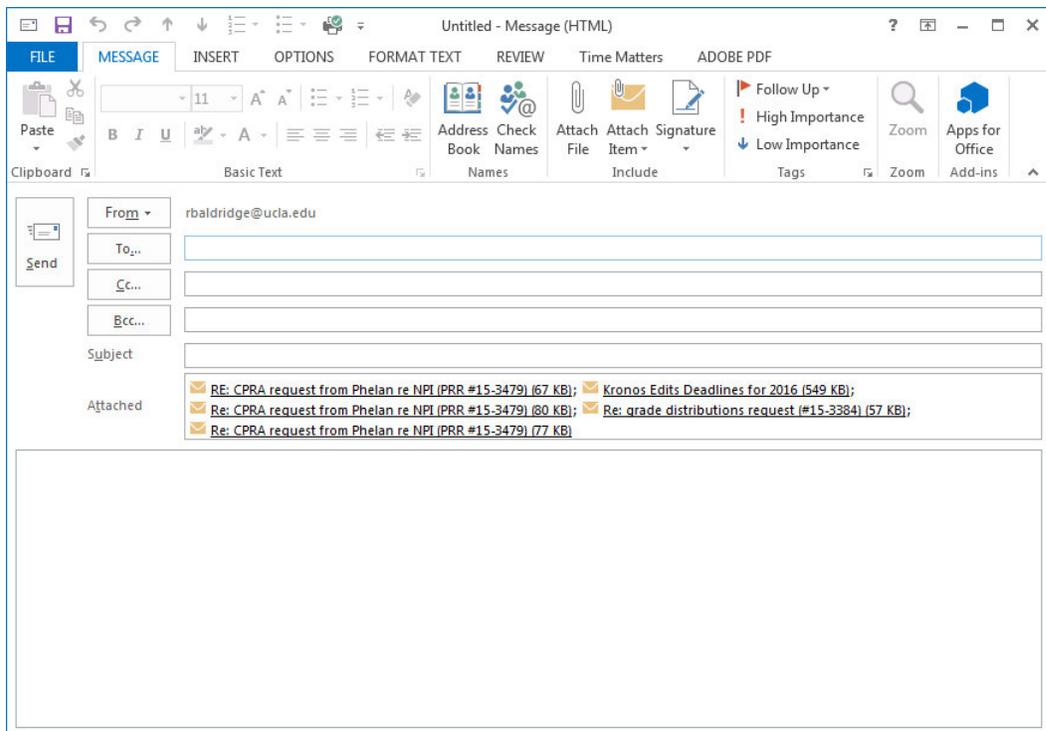
Step 2:

Then right-click on any of the highlighted emails, which will cause a dialog box to appear, as seen here. Scroll to “Forward” and left-click on it.



Step 3:

Thereafter, a new email will open up, with all the selected emails included as attachments. Now, simply forward that email to me.



**From:** [Horowitz, Cara](#)  
**To:** [Hawkins, Marisa](#); [Carlson, Ann E.](#)  
**Cc:** [Baldrige, Robert](#); [Donmez, Ayse](#)  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)  
**Date:** Wednesday, March 07, 2018 12:21:50 PM

---

Thank you, Marisa. Ann and I would like to discuss this request with counsel in your office. Would that be possible? Perhaps sometime early next week?

I am relatively free Monday afternoon (except from 3pm-3:30) and Tuesday afternoon after 1:30.

Thanks,  
Cara

Cara Horowitz  
Andrew Sabin Family Foundation Co-Executive Director  
Emmett Institute on Climate Change and the Environment  
UCLA School of Law  
Ph (310) 206-4033  
[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)  
[www.law.ucla.edu/emmett](http://www.law.ucla.edu/emmett)

---

**From:** Hawkins, Marisa [mailto:[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)]  
**Sent:** Thursday, March 1, 2018 12:02 PM  
**To:** Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)>; Carlson, Ann <[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Dear Professor Horowitz and Professor Carlson,

My name is Marisa Hawkins and I am a staff member at UCLA Information Practices, working under Robert Baldrige. Mr. Baldrige recommended that I reach out to you because we recently received the attached request under the California Public Records Act (CPRA) from Christopher C. Horner, a Senior Fellow at the Competitive Enterprise Institute.

The request is somewhat involved, so I have summarized it below. Briefly, it is seeking:

- 1. Emails to or from Professor Horowitz and/or Professor Carlson, dated March 1, 2016 through April 30, 2016, meeting any of the following criteria:**
  - a. That are to or from Shaun Goho; or**
  - b. That contain any of the following terms:**

- i. Harvard
  - ii. Pawa
  - iii. Frumhoff
  - iv. UCS
  - v. Eubanks
  - vi. CIEL
2. **Emails to or from Professor Horowitz and/or Professor Carlson, dated December 1, 2017 through January 31, 2018, meeting any of the following criteria:**
- a. **That relate to an event (date not specified by the requester) at UCLA, which followed up on an April 25, 2016 event at Harvard Law School; or**
  - b. **That contain any of the following terms:**
    - i. Frumhoff
    - ii. McKibbon
    - iii. Kimmell
    - iv. Union of Concerned Scientists
    - v. UCS
    - vi. @ucsusa.org

Would you be able to provide any responsive emails to any or all of the above requests?

Please know that the Office of Legal Affairs (OLA) is already aware of this request and that any responsive records provided will be thoroughly reviewed and vetted with the input of OLA and redacted and/or withheld where possible, pursuant to the legal exemptions to disclosure under CPRA.

For your reference, I have included our guidelines regarding the collection and forwarding of responsive emails. Please feel free to contact me if you have any questions or concerns.

Best regards,

**Marisa Hawkins**

Senior Public Records Analyst

UCLA Information Practices

(310) 206-4159

[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

**From:** [Carlson, Ann](#)  
**To:** [Horowitz, Cara](#)  
**Cc:** [Hawkins, Marisa](#); [Baldrige, Robert](#); [Donmez, Ayse](#)  
**Subject:** Re: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)  
**Date:** Wednesday, March 07, 2018 12:29:59 PM

---

Monday would work for me or Tuesday after 3. Thanks!

On Mar 7, 2018, at 12:21 PM, Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)> wrote:

Thank you, Marisa. Ann and I would like to discuss this request with counsel in your office. Would that be possible? Perhaps sometime early next week?

I am relatively free Monday afternoon (except from 3pm-3:30) and Tuesday afternoon after 1:30.

Thanks,  
Cara

Cara Horowitz  
Andrew Sabin Family Foundation Co-Executive Director  
Emmett Institute on Climate Change and the Environment  
UCLA School of Law  
Ph (310) 206-4033  
[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)  
[www.law.ucla.edu/emmett](http://www.law.ucla.edu/emmett)

---

**From:** Hawkins, Marisa [<mailto:mhawkins@finance.ucla.edu>]  
**Sent:** Thursday, March 1, 2018 12:02 PM  
**To:** Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)>; Carlson, Ann <[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Dear Professor Horowitz and Professor Carlson,

My name is Marisa Hawkins and I am a staff member at UCLA Information Practices, working under Robert Baldrige. Mr. Baldrige recommended that I reach out to you because we recently received the attached request under the California Public Records

Act (CPRA) from Christopher C. Horner, a Senior Fellow at the Competitive Enterprise Institute.

The request is somewhat involved, so I have summarized it below. Briefly, it is seeking:

**1. Emails to or from Professor Horowitz and/or Professor Carlson, dated March 1, 2016 through April 30, 2016, meeting any of the following criteria:**

**a. That are to or from Shaun Goho; or**

**b. That contain any of the following terms:**

- i. **Harvard**
- ii. **Pawa**
- iii. **Frumhoff**
- iv. **UCS**
- v. **Eubanks**
- vi. **CIEL**

**2. Emails to or from Professor Horowitz and/or Professor Carlson, dated December 1, 2017 through January 31, 2018, meeting any of the following criteria:**

**a. That relate to an event (date not specified by the requester) at UCLA, which followed up on an April 25, 2016 event at Harvard Law School; or**

**b. That contain any of the following terms:**

- i. **Frumhoff**
- ii. **McKibbon**
- iii. **Kimmell**
- iv. **Union of Concerned**

**Scientists**

- v. **UCS**
- vi. **@ucsusa.org**

Would you be able to provide any responsive emails to any or all of the above requests?

Please know that the Office of Legal Affairs (OLA) is already aware of this request and that any responsive records provided will be thoroughly reviewed and vetted with the input of OLA and redacted and/or withheld where possible, pursuant to the legal exemptions to disclosure under CPRA.

For your reference, I have included our guidelines regarding the collection and forwarding of responsive emails. Please feel free to contact me if you have any questions or concerns.

Best regards,

**Marisa Hawkins**

Senior Public Records Analyst

UCLA Information Practices

(310) 206-4159

[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

**From:** [Hawkins, Marisa](#)  
**To:** [Carlson, Ann E.](#)  
**Cc:** [Baldridge, Robert](#); [Donmez, Ayse](#)  
**Subject:** Competitive Enterprise Institute Request #2 Re Emails of Professors Horowitz and Carlson (18-5666)  
**Date:** Friday, May 25, 2018 3:53:43 PM  
**Attachments:** [Request \(18-5666\).pdf](#)  
[Emails - Guidelines re Collection for Production.pdf](#)

---

Dear Ann,

Information Practices has received a second request, herein attached, from Christopher Horner at the Competitive Enterprise Institute. This new request is seeking the following:

**“...copies of all correspondence and its accompanying information, including also any attachments, that were sent by, sent to (including copying, whether as cc: or bcc:) or otherwise were received or are possessed by UCLA School of Law’s Cara Horowitz, and/or Ann Carlson, dated from May 1, 2016 through the date you process this request, inclusive, which are also:**

**a) to or from Shaun Goho, *and/or***

**b) which use any of the following terms, *anywhere* in the correspondence be it the to, from, cc, bcc, and/or Subject fields and/or body of the email or attachments: i) Harvard, ii) Pawa, iii) Eubanks, iv) McKibben, v) Kimmell, vi) “Union of Concerned Scientists”, and/or vii) @ucsusa.org.”**

Would you be able to provide any responsive emails? Since this new request covers a span of two years, it would be helpful, as a preliminary matter, if you could give me an estimate of how many records we might be dealing with.

Please know that the Office of Legal Affairs (OLA) is already aware of this request and that any responsive records provided will be thoroughly reviewed and vetted with the input of OLA and redacted and/or withheld where possible, pursuant to the legal exemptions to disclosure under CPRA.

As always, please do not hesitate to contact me if you have questions or concerns, and thank you in advance for your assistance with this matter.

Best,  
Marisa

**Marisa Hawkins**

Senior Public Records Analyst  
UCLA Information Practices  
(310) 206-4159  
[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

**From:** [Chris Horner](#)  
**To:** [records@ucla.edu](mailto:records@ucla.edu)  
**Subject:** REQUEST UNDER CALIFORNIA'S PUBLIC RECORDS ACT -- certain Horowitz, Carlson correspondence  
**Date:** Monday, May 21, 2018 2:53:36 PM  
**Attachments:** [CEI UCLA Horowitz Carlson UCS et al PRA request.pdf](#)

---

Please see the attached.

1310 L Street, NW, 7th Floor  
Washington, DC 20005  
cei.org

202 331 1010 *main*  
202 331 0640 *fax*



## REQUEST UNDER CALIFORNIA'S PUBLIC RECORDS ACT

May 21, 2018

Records Management & Information Practices  
10920 Wilshire Boulevard  
Suite 530  
Los Angeles, CA 90024-6541

**BY ELECTRONIC MAIL** — [records@ucla.edu](mailto:records@ucla.edu)

UCLA Records Management Officer,

On behalf of the Competitive Enterprise Institute (CEI), a non-profit public policy institute in Washington, DC and pursuant to the California Government Code §§ 6250 *et. seq.*, please provide us within 10 business days copies of all correspondence and its accompanying information<sup>1</sup>, including also any attachments, that were sent by, sent to (including copying, whether as cc: or bcc:) or otherwise were received or are possessed by UCLA School of Law's **Cara Horowitz**, and/or **Ann Carlson**, dated from **May 1, 2016** through the date you process this request, inclusive, which are also:

- a) to or from Shaun Goho, *and/or*
- b) which use any of the following terms, *anywhere* in the correspondence be it the to, from, cc, bcc, and/or Subject fields and/or body of the email or attachments: i) Harvard, ii) Pawa, iii) Eubanks, iv) McKibben, v) Kimmell, vi) "Union of Concerned Scientists", and/or vii) @ucsusa.org. None of these terms are case sensitive.

---

<sup>1</sup> This includes public records, and associated public information, see discussion of Data Delivery Standards, *infra*.

1310 L Street, NW, 7th Floor  
Washington, DC 20005  
cei.org

202 331 1010 *main*  
202 331 0640 *fax*



Public records show that Professors Horowitz and Carlson are using their positions at your public university to coordinate with certain activists groups in organizing and pursuing law enforcement and civil investigations and litigation against private opponents of a particular political agenda. We seek correspondence and other records illuminating this use of a public university faculty position and resources.

**Please consider as responsive entire email “threads”** containing any information responsive to this request, regardless whether any part of that thread falls outside the cited search parameters.

**We request records on the University’s system**, e.g., its backend logs, not those which survive on a faculty member’s own machine or account.

**We do not demand your Office produce requested information in any particular form, instead we request records in their native form, with specific reference to the U.S. Securities and Exchange Commission Data Delivery Standards.<sup>2</sup>** The covered information we seek is electronic information, this includes electronic *records*, and other public *information*.

To quote the SEC Data Delivery Standards, “Electronic files must be produced in their native format, i.e. the format in which they are ordinarily used and maintained during the normal course of business. For example, an MS Excel file must be produced as an MS Excel file rather than an image of a spreadsheet. *(Note: An Adobe PDF file is not considered a native file unless the document was initially created as a PDF.)* (emphases in original).

---

<sup>2</sup> <https://www.sec.gov/divisions/enforce/datadeliverystandards.pdf>.



In many native-format productions, certain public information remains contained in the record (e.g., metadata). Under the same standards, to ensure production of all information requested, if your production will be de-duplicated it is vital that you 1) preserve any unique metadata associated with the duplicate files, for example, custodian name, and, 2) make that unique metadata part of your production.

Native file productions may be produced without load files. However, native file productions must maintain the integrity of the original meta data, and must be produced as they are maintained in the normal course of business and organized by custodian-named file folders. A separate folder should be provided for each custodian.

In the event that necessity requires your Office to produce a PDF file, due to your normal program for redacting certain information and such that native files cannot be produced as they are maintained in the normal course of business, in order to provide all requested information each PDF file should be produced in separate folders named by the custodian, *and* accompanied by a load file to ensure the requested information appropriate for that discrete record is associated with that record. The required fields and format of the data to be provided within the load file can be found in Addendum A of the above-cited SEC Data Standards. All produced PDFs must be text searchable.

In the context of our experience with responsive agencies taking the effort to physically print, then (often, poorly) scan *electronic* mail into (typically, non-searchable) PDF files, we note that production of electronic records necessitates no such additional time, effort or other

1310 L Street, NW, 7th Floor  
Washington, DC 20005  
cei.org

202 331 1010 *main*  
202 331 0640 *fax*



resources, and no photocopying expense. Any such effort as described is most reasonably viewed as an effort to frustrate the requester's use of the public information.

We understand we owe the office the cost of material, required to satisfy this request. We agree to pay legitimate expenses up to \$150.00. If you estimate costs will exceed that please notify us immediately and break down the expected costs.

The undersigned do not seek the information for a commercial purpose. CEI is organized and recognized by the Internal Revenue Service as a 501(c)3 educational organization. As such, it has no commercial interest possible in these records.

Also, CEI is a media organization, which the federal government has already acknowledged is the case for purposes of the federal FOIA.<sup>3</sup>

As such, we request a waiver of any fees involved, as release of these records is in the public interest and the Office is permitted to and does exercise discretion in waiving or reducing fees on that basis.

The campaign in which Profs. Carlson and Horowitz have involved themselves and the School using, and which they have participated in expressly on the basis of, their UCLA credential<sup>4</sup> is the subject of intense public, media, congressional oversight and now judicial

---

<sup>3</sup> See e.g., Department of the Treasury FOIA Nos. 2012-08-053, 2012-08-054.

<sup>4</sup> See, e.g., <https://law.ucla.edu/news-and-events/4065/2018/1/25/holding-fossil-fuel-companies-liable-for-climate-change-harms-in-california-c--law-science-and-justice---keynote-remarks-by-bill-mckibben/> and <https://blog.ucsusa.org/peter-frumhoff/scientists-state-prosecutors-fossil-fuel-companies-climate-accountability>.

1310 L Street, NW, 7th Floor  
Washington, DC 20005  
cei.org

202 331 1010 *main*  
202 331 0640 *fax*



interest<sup>5</sup> — which is indeed a principal objective of the campaign.<sup>6</sup> It involves third-parties and plainly no relevant privilege with the exception of possible personal contact information if that information is not already posted on the websites of various participating universities, pressure groups and the like. The requested information is of critical importance to the nonprofit policy advocacy groups engaged on these relevant issues, news media covering the issues, and any others concerned with government activities on this critical subject, or as the United States Supreme Court once noted in the context of the federal FOIA, what their government, which under open records laws includes publicly funded academic institutions, is up to.

If you have any questions please do not hesitate to contact me. We look forward to your timely response.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Chris Horner", with a long, sweeping underline that extends to the right.

Christopher C. Horner  
Senior Fellow, CEI  
[chris.horner@cei.org](mailto:chris.horner@cei.org)  
202.262.4458

---

<sup>5</sup> See, e.g., John O'Brien, "Exxon Prepares To Sue California Cities, Says They Contradict Themselves On Climate Change", *Forbes*, January 8, 2018, <https://www.forbes.com/sites/legalnewsline/2018/01/08/exxon-prepares-to-sue-california-cities-say-they-contradict-themselves-on-climate-change/amp/>; Andrew Scurria, "California Municipalities' Debt Disclosures Contrast With Climate Warnings", *Wall Street Journal*, January 8, 2018, <https://www.wsj.com/articles/california-municipalities-debt-disclosures-contrast-with-climate-warnings-1515456551>; see also <https://www.courthousenews.com/wp-content/uploads/2018/01/ExxonDepositions.pdf>.

<sup>6</sup> See, e.g., <http://eidclimate.org/video-attorney-admitted-press-coverage-might-important-winning-climate-lawsuits/>.

## **Emails: Guidelines Regarding Collecting and Forwarding**

Please search your folders for any responsive emails, including archived folders/emails, and then provide them to us, preferably as attachments to a single email or, if too voluminous for that, as an Outlook PST file saved on a CD or flash drive. If you need help with searching and retrieving the emails, either your IT department or someone from my department will be able to assist you. Please know that all emails will be thoroughly reviewed by our department and Campus Counsel to see if any legal exemptions exist to prevent disclosure, (such as attorney-client privilege, or Academic Freedom regarding scholarly research, among others).

**If simply forwarding emails**, it is preferable that you **not** forward each one individually, as we would then not be able to print out and/or PDF/save each email without having it now include us in the correspondence (from you, to us), and so that portion would then have to be redacted back out of what is produced. Therefore, please use the method as seen in the attachment: "Guide to Forwarding Emails as Attachments to a Single Email," which provides screenshots and simple instructions.

As noted, if the amount of emails is too voluminous to forward as attachments to one or more emails, then creating a PST file in Outlook might be the best way to go...

**If creating a PST file:** In case you're not familiar with how to create a PST file to export your emails, the following link provides step-by-step instructions with pictures: <http://office.microsoft.com/en-us/outlook-help/export-outlook-items-to-an-outlook-data-file-pst-HA102534110.aspx>. We have also provided the steps below:

On the main Outlook screen click 'File' tab then select 'Options'

1. Click 'Advanced'
2. Under the export section click 'Export'
3. Select 'Export to a file' then click 'Next'
4. Select "Outlook Data File (.pst)" then click 'Next'
5. Select the desired folder and click 'Next'
6. Save the file to a location you'll be able to find later then click 'Finish'  
\*optional\* add a password and click 'OK'

Upload the created PST file to a CD or flash drive and then forward that to the attention of the Information Practices staff member handling the matter. If using Campus Mail, send it to the person's attention at Records Management and Information Practices, Wilshire Center, Suite 530. Mail code: 143348.

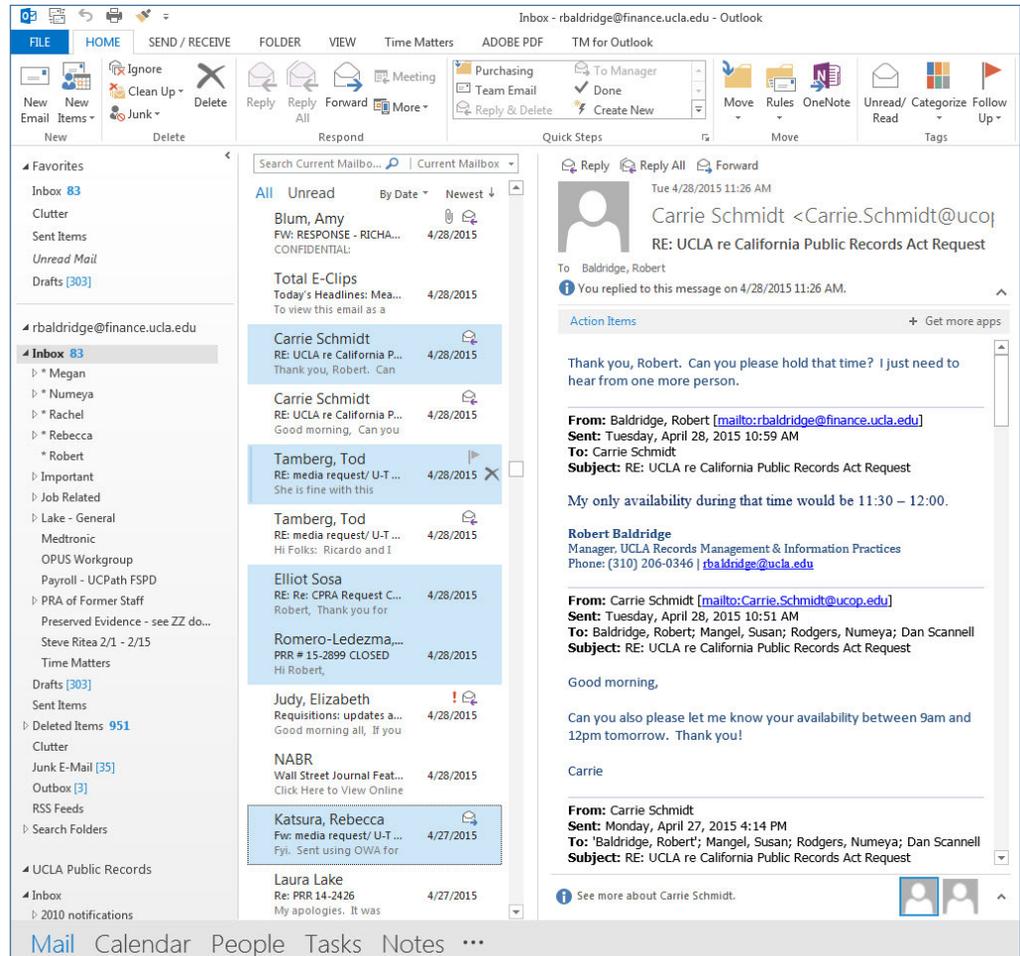
## Forwarding Emails as Attachments to a Single Email

As noted, if simply forwarding emails, it is preferable that you **not** forward each one individually, as I would then not be able to print out and/or PDF/save each email without having it now include me in the correspondence (from you, to me), and so that portion would then have to be redacted back out of what is produced. Therefore, please use the following method, which will be less time-consuming for both of us:

### Instructions for attaching emails to a single email:

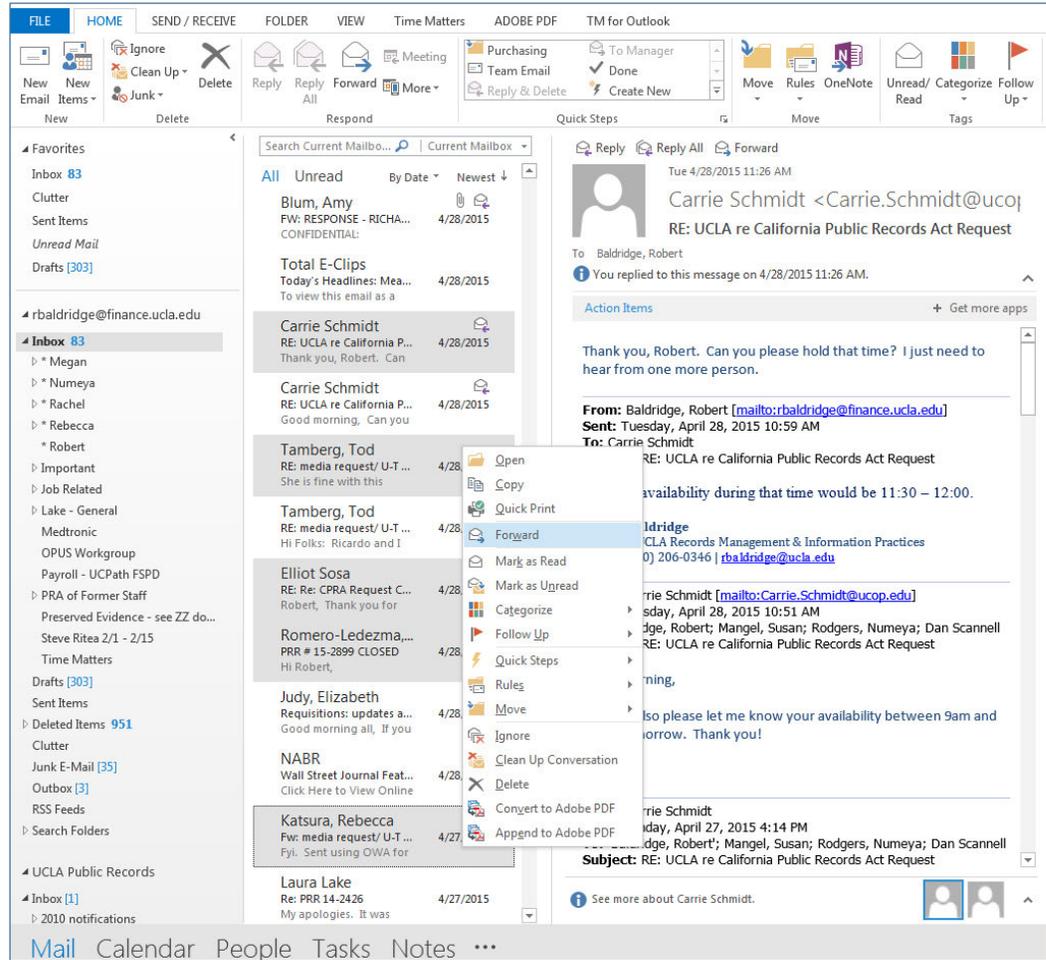
#### Step 1:

While holding down the “Ctrl” key click on each responsive email, which will leave you with highlighted emails, as seen here:



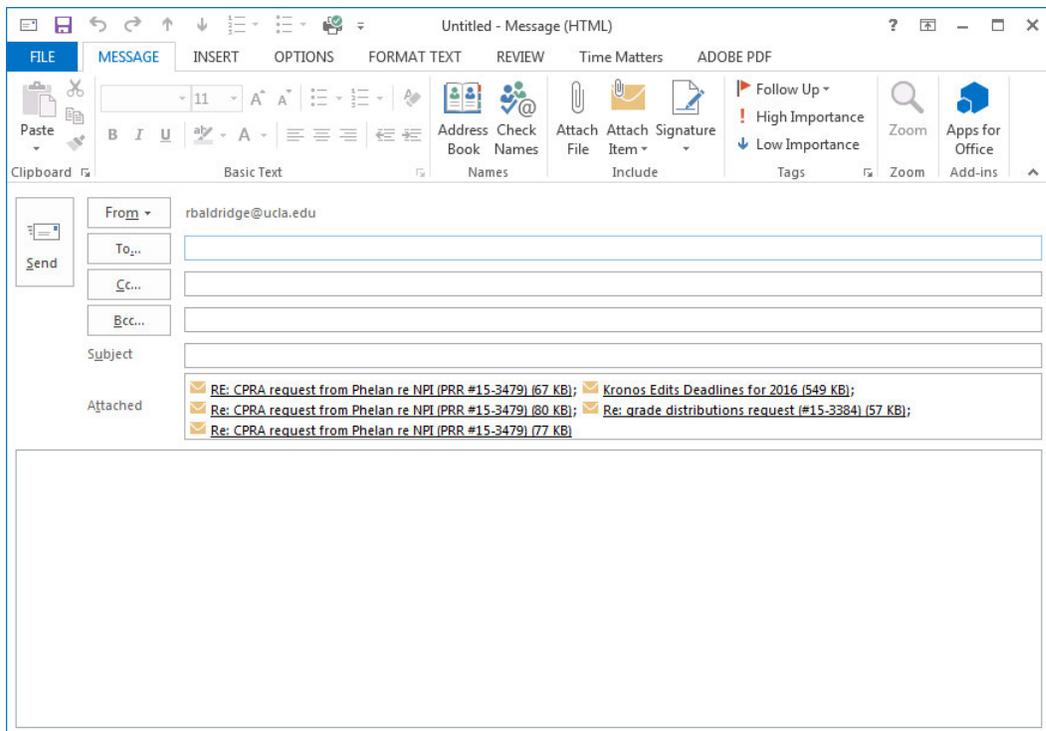
Step 2:

Then right-click on any of the highlighted emails, which will cause a dialog box to appear, as seen here. Scroll to “Forward” and left-click on it.



Step 3:

Thereafter, a new email will open up, with all the selected emails included as attachments. Now, simply forward that email to me.



**From:** [Hawkins, Marisa](#)  
**To:** [Horowitz, Cara](#)  
**Cc:** [Baldrige, Robert](#); [Donmez, Ayse](#)  
**Subject:** Competitive Enterprise Institute Request #2 Re Emails of Professors Horowitz and Carlson (18-5666)  
**Date:** Friday, May 25, 2018 3:53:50 PM  
**Attachments:** [Request \(18-5666\).PDF](#)  
[Emails - Guidelines re Collection for Production.pdf](#)

---

Dear Cara,

Information Practices has received a second request, herein attached, from Christopher Horner at the Competitive Enterprise Institute. This new request is seeking the following:

**“...copies of all correspondence and its accompanying information, including also any attachments, that were sent by, sent to (including copying, whether as cc: or bcc:) or otherwise were received or are possessed by UCLA School of Law’s Cara Horowitz, and/or Ann Carlson, dated from May 1, 2016 through the date you process this request, inclusive, which are also:**

**a) to or from Shaun Goho, *and/or***

**b) which use any of the following terms, *anywhere* in the correspondence be it the to, from, cc, bcc, and/or Subject fields and/or body of the email or attachments: i) Harvard, ii) Pawa, iii) Eubanks, iv) McKibben, v) Kimmell, vi) “Union of Concerned Scientists”, and/or vii) @ucsusa.org.”**

Would you be able to provide any responsive emails? Since this new request covers a span of two years, it would be helpful, as a preliminary matter, if you could give me an estimate of how many records we might be dealing with.

Please know that the Office of Legal Affairs (OLA) is already aware of this request and that any responsive records provided will be thoroughly reviewed and vetted with the input of OLA and redacted and/or withheld where possible, pursuant to the legal exemptions to disclosure under CPRA.

As always, please do not hesitate to contact me if you have questions or concerns, and thank you in advance for your assistance with this matter.

Best,  
Marisa

**Marisa Hawkins**

Senior Public Records Analyst  
UCLA Information Practices  
(310) 206-4159  
[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

**From:** [Chris Horner](#)  
**To:** [records@ucla.edu](mailto:records@ucla.edu)  
**Subject:** REQUEST UNDER CALIFORNIA'S PUBLIC RECORDS ACT -- certain Horowitz, Carlson correspondence  
**Date:** Monday, May 21, 2018 2:53:36 PM  
**Attachments:** [CEI UCLA Horowitz Carlson UCS et al PRA request.pdf](#)

---

Please see the attached.

1310 L Street, NW, 7th Floor  
Washington, DC 20005  
cei.org

202 331 1010 *main*  
202 331 0640 *fax*



## REQUEST UNDER CALIFORNIA'S PUBLIC RECORDS ACT

May 21, 2018

Records Management & Information Practices  
10920 Wilshire Boulevard  
Suite 530  
Los Angeles, CA 90024-6541

**BY ELECTRONIC MAIL** — [records@ucla.edu](mailto:records@ucla.edu)

UCLA Records Management Officer,

On behalf of the Competitive Enterprise Institute (CEI), a non-profit public policy institute in Washington, DC and pursuant to the California Government Code §§ 6250 *et. seq.*, please provide us within 10 business days copies of all correspondence and its accompanying information<sup>1</sup>, including also any attachments, that were sent by, sent to (including copying, whether as cc: or bcc:) or otherwise were received or are possessed by UCLA School of Law's **Cara Horowitz**, and/or **Ann Carlson**, dated from **May 1, 2016** through the date you process this request, inclusive, which are also:

- a) to or from Shaun Goho, *and/or*
- b) which use any of the following terms, *anywhere* in the correspondence be it the to, from, cc, bcc, and/or Subject fields and/or body of the email or attachments: i) Harvard, ii) Pawa, iii) Eubanks, iv) McKibben, v) Kimmell, vi) "Union of Concerned Scientists", and/or vii) @ucsusa.org. None of these terms are case sensitive.

---

<sup>1</sup> This includes public records, and associated public information, see discussion of Data Delivery Standards, *infra*.



Public records show that Professors Horowitz and Carlson are using their positions at your public university to coordinate with certain activists groups in organizing and pursuing law enforcement and civil investigations and litigation against private opponents of a particular political agenda. We seek correspondence and other records illuminating this use of a public university faculty position and resources.

**Please consider as responsive entire email “threads”** containing any information responsive to this request, regardless whether any part of that thread falls outside the cited search parameters.

**We request records on the University’s system**, e.g., its backend logs, not those which survive on a faculty member’s own machine or account.

**We do not demand your Office produce requested information in any particular form, instead we request records in their native form, with specific reference to the U.S. Securities and Exchange Commission Data Delivery Standards.<sup>2</sup>** The covered information we seek is electronic information, this includes electronic *records*, and other public *information*.

To quote the SEC Data Delivery Standards, “Electronic files must be produced in their native format, i.e. the format in which they are ordinarily used and maintained during the normal course of business. For example, an MS Excel file must be produced as an MS Excel file rather than an image of a spreadsheet. *(Note: An Adobe PDF file is not considered a native file unless the document was initially created as a PDF.)* (emphases in original).

---

<sup>2</sup> <https://www.sec.gov/divisions/enforce/datadeliverystandards.pdf>.



In many native-format productions, certain public information remains contained in the record (e.g., metadata). Under the same standards, to ensure production of all information requested, if your production will be de-duplicated it is vital that you 1) preserve any unique metadata associated with the duplicate files, for example, custodian name, and, 2) make that unique metadata part of your production.

Native file productions may be produced without load files. However, native file productions must maintain the integrity of the original meta data, and must be produced as they are maintained in the normal course of business and organized by custodian-named file folders. A separate folder should be provided for each custodian.

In the event that necessity requires your Office to produce a PDF file, due to your normal program for redacting certain information and such that native files cannot be produced as they are maintained in the normal course of business, in order to provide all requested information each PDF file should be produced in separate folders named by the custodian, *and* accompanied by a load file to ensure the requested information appropriate for that discrete record is associated with that record. The required fields and format of the data to be provided within the load file can be found in Addendum A of the above-cited SEC Data Standards. All produced PDFs must be text searchable.

In the context of our experience with responsive agencies taking the effort to physically print, then (often, poorly) scan *electronic* mail into (typically, non-searchable) PDF files, we note that production of electronic records necessitates no such additional time, effort or other

1310 L Street, NW, 7th Floor  
Washington, DC 20005  
cei.org

202 331 1010 *main*  
202 331 0640 *fax*



resources, and no photocopying expense. Any such effort as described is most reasonably viewed as an effort to frustrate the requester's use of the public information.

We understand we owe the office the cost of material, required to satisfy this request. We agree to pay legitimate expenses up to \$150.00. If you estimate costs will exceed that please notify us immediately and break down the expected costs.

The undersigned do not seek the information for a commercial purpose. CEI is organized and recognized by the Internal Revenue Service as a 501(c)3 educational organization. As such, it has no commercial interest possible in these records.

Also, CEI is a media organization, which the federal government has already acknowledged is the case for purposes of the federal FOIA.<sup>3</sup>

As such, we request a waiver of any fees involved, as release of these records is in the public interest and the Office is permitted to and does exercise discretion in waiving or reducing fees on that basis.

The campaign in which Profs. Carlson and Horowitz have involved themselves and the School using, and which they have participated in expressly on the basis of, their UCLA credential<sup>4</sup> is the subject of intense public, media, congressional oversight and now judicial

---

<sup>3</sup> See e.g., Department of the Treasury FOIA Nos. 2012-08-053, 2012-08-054.

<sup>4</sup> See, e.g., <https://law.ucla.edu/news-and-events/4065/2018/1/25/holding-fossil-fuel-companies-liable-for-climate-change-harms-in-california-c--law-science-and-justice---keynote-remarks-by-bill-mckibben/> and <https://blog.ucsusa.org/peter-frumhoff/scientists-state-prosecutors-fossil-fuel-companies-climate-accountability>.

1310 L Street, NW, 7th Floor  
Washington, DC 20005  
cei.org

202 331 1010 *main*  
202 331 0640 *fax*



interest<sup>5</sup> — which is indeed a principal objective of the campaign.<sup>6</sup> It involves third-parties and plainly no relevant privilege with the exception of possible personal contact information if that information is not already posted on the websites of various participating universities, pressure groups and the like. The requested information is of critical importance to the nonprofit policy advocacy groups engaged on these relevant issues, news media covering the issues, and any others concerned with government activities on this critical subject, or as the United States Supreme Court once noted in the context of the federal FOIA, what their government, which under open records laws includes publicly funded academic institutions, is up to.

If you have any questions please do not hesitate to contact me. We look forward to your timely response.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "C. Horner", with a long, sweeping horizontal line extending to the right.

Christopher C. Horner  
Senior Fellow, CEI  
[chris.horner@cei.org](mailto:chris.horner@cei.org)  
202.262.4458

---

<sup>5</sup> See, e.g., John O'Brien, "Exxon Prepares To Sue California Cities, Says They Contradict Themselves On Climate Change", *Forbes*, January 8, 2018, <https://www.forbes.com/sites/legalnewsline/2018/01/08/exxon-prepares-to-sue-california-cities-say-they-contradict-themselves-on-climate-change/amp/>; Andrew Scurria, "California Municipalities' Debt Disclosures Contrast With Climate Warnings", *Wall Street Journal*, January 8, 2018, <https://www.wsj.com/articles/california-municipalities-debt-disclosures-contrast-with-climate-warnings-1515456551>; see also <https://www.courthousenews.com/wp-content/uploads/2018/01/ExxonDepositions.pdf>.

<sup>6</sup> See, e.g., <http://eidclimate.org/video-attorney-admitted-press-coverage-might-important-winning-climate-lawsuits/>.

## **Emails: Guidelines Regarding Collecting and Forwarding**

Please search your folders for any responsive emails, including archived folders/emails, and then provide them to us, preferably as attachments to a single email or, if too voluminous for that, as an Outlook PST file saved on a CD or flash drive. If you need help with searching and retrieving the emails, either your IT department or someone from my department will be able to assist you. Please know that all emails will be thoroughly reviewed by our department and Campus Counsel to see if any legal exemptions exist to prevent disclosure, (such as attorney-client privilege, or Academic Freedom regarding scholarly research, among others).

**If simply forwarding emails**, it is preferable that you **not** forward each one individually, as we would then not be able to print out and/or PDF/save each email without having it now include us in the correspondence (from you, to us), and so that portion would then have to be redacted back out of what is produced. Therefore, please use the method as seen in the attachment: "Guide to Forwarding Emails as Attachments to a Single Email," which provides screenshots and simple instructions.

As noted, if the amount of emails is too voluminous to forward as attachments to one or more emails, then creating a PST file in Outlook might be the best way to go...

**If creating a PST file:** In case you're not familiar with how to create a PST file to export your emails, the following link provides step-by-step instructions with pictures: <http://office.microsoft.com/en-us/outlook-help/export-outlook-items-to-an-outlook-data-file-pst-HA102534110.aspx>. We have also provided the steps below:

On the main Outlook screen click 'File' tab then select 'Options'

1. Click 'Advanced'
2. Under the export section click 'Export'
3. Select 'Export to a file' then click 'Next'
4. Select "Outlook Data File (.pst)" then click 'Next'
5. Select the desired folder and click 'Next'
6. Save the file to a location you'll be able to find later then click 'Finish'  
\*optional\* add a password and click 'OK'

Upload the created PST file to a CD or flash drive and then forward that to the attention of the Information Practices staff member handling the matter. If using Campus Mail, send it to the person's attention at Records Management and Information Practices, Wilshire Center, Suite 530. Mail code: 143348.

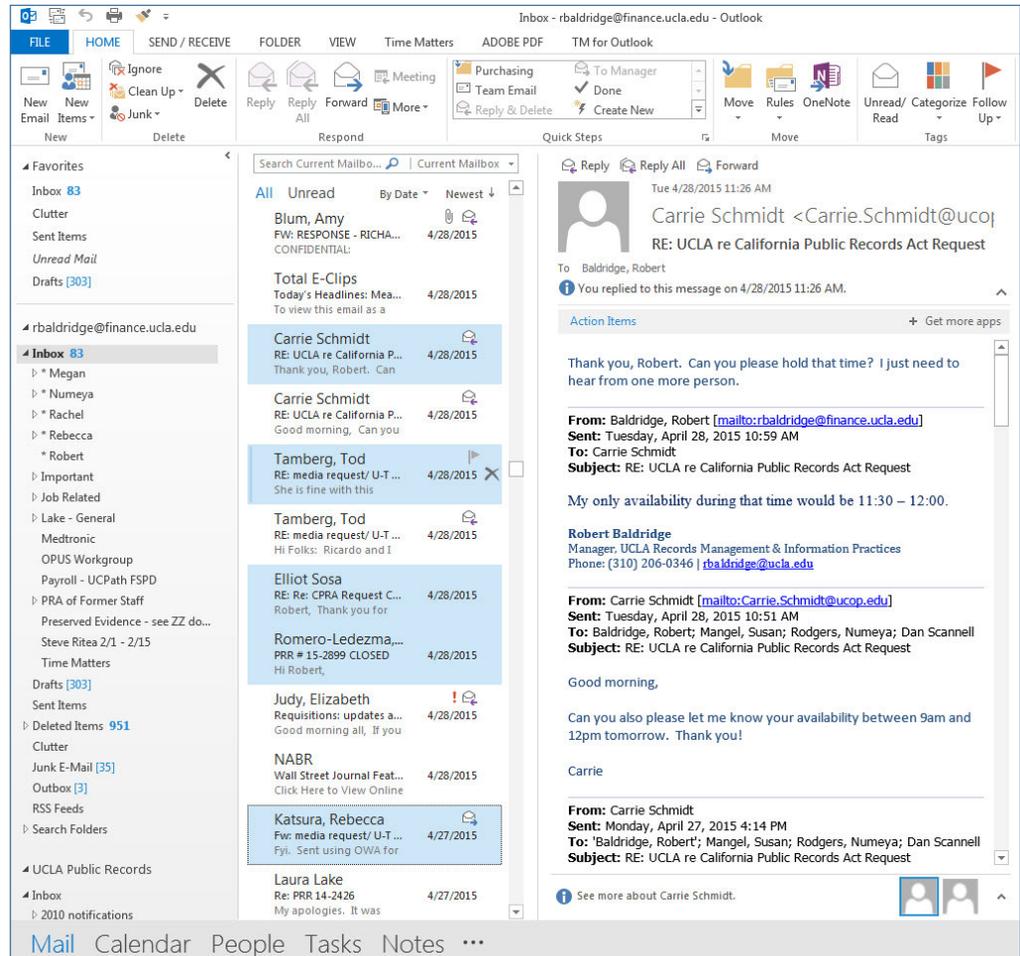
## Forwarding Emails as Attachments to a Single Email

As noted, if simply forwarding emails, it is preferable that you **not** forward each one individually, as I would then not be able to print out and/or PDF/save each email without having it now include me in the correspondence (from you, to me), and so that portion would then have to be redacted back out of what is produced. Therefore, please use the following method, which will be less time-consuming for both of us:

### Instructions for attaching emails to a single email:

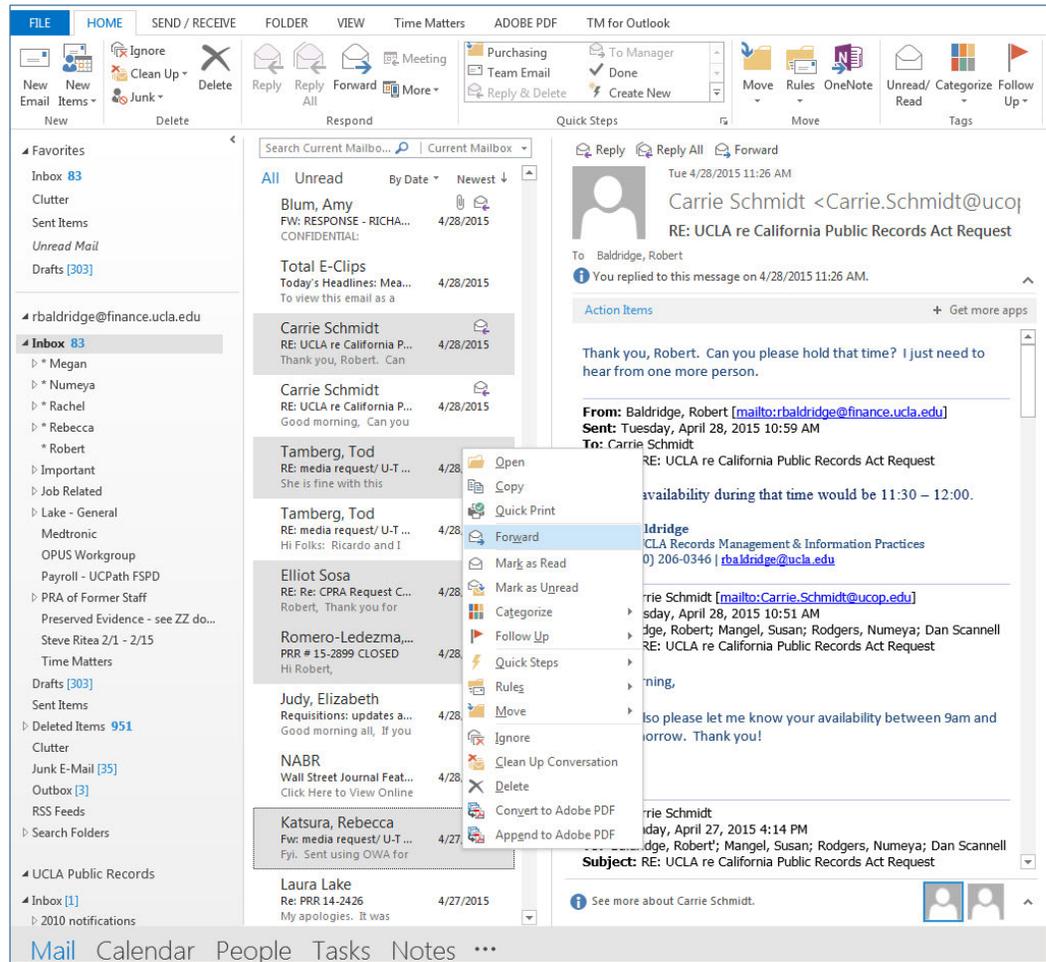
#### Step 1:

While holding down the “Ctrl” key click on each responsive email, which will leave you with highlighted emails, as seen here:



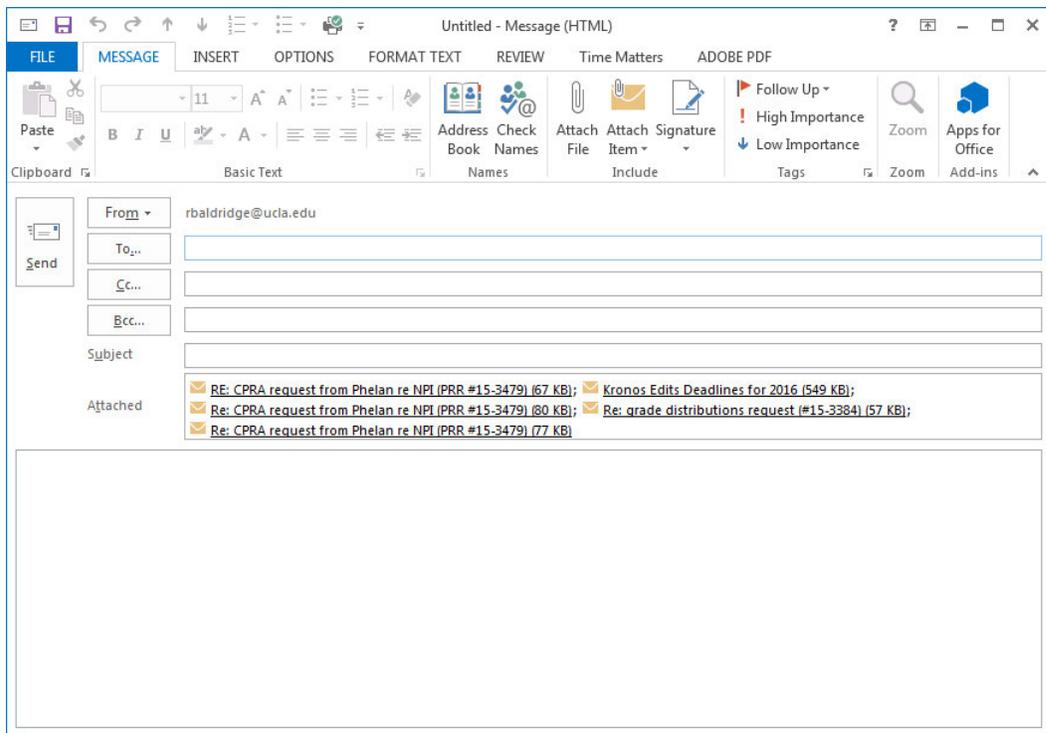
Step 2:

Then right-click on any of the highlighted emails, which will cause a dialog box to appear, as seen here. Scroll to “Forward” and left-click on it.



Step 3:

Thereafter, a new email will open up, with all the selected emails included as attachments. Now, simply forward that email to me.



**From:** [Yzaguirre, Zaine](#)  
**To:** [Baldrige, Robert](#); [Donmez, Ayse](#)  
**Subject:** Logged In PRR # 18-5367  
**Date:** Monday, February 05, 2018 3:17:46 PM

---

FYI

I have logged PRR # 18-5367 from Competitive Enterprise Institute regarding employee email correspondence. Please note this is a 7 page request with more information than I could fit into the "Docs Req" tab in TM. I will prepare an Ack Letter asap. Please let me know if there is anything else I can do to assist with this matter.

Best,

**Zaine Yzaguirre**

*Office Coordinator*

*UCLA Information Practices*

*(310) 794-8741*

[zyzaguirre@finance.ucla.edu](mailto:zyzaguirre@finance.ucla.edu)

**From:** [Baldrige, Robert](#)  
**To:** [Hawkins, Marisa](#)  
**Cc:** [Donmez, Ayse](#)  
**Subject:** New Assignment: 18-5367 -- CEI re Emails of Profs. Horowitz & Carlson  
**Date:** Thursday, March 01, 2018 12:53:54 AM

---

Hi Marisa,

Please handle this CPRA request from Competitive Enterprise Institute (CEI), which is seeking the following:

"I. copies of all correspondence and its accompanying information, including also any attachments, that were sent by, sent to (including copying, whether as cc: or bcc:) or otherwise were received or are possessed by UCLA School of Law's Cara Horowitz, and/or Ann Carlson, dated from March 1, 2016 to April 30, 2016, inclusive, which are also:

- a) to or from Shaun Goho, and/or
- b) which use any of the following terms, anywhere in the correspondence be it the to, from, cc, bcc, and/or Subject fields and/or body of the email: i) Harvard, ii) Pawa, iii) Frumhoff, iv) UCS, v) Eubanks, and/or vi) CIEL (these terms are not case sensitive).

II. Similarly, UCLA held a followup event, moderated by Ms. Horowitz with the participation of Prof. Carlson specifically as "Shirley Shapiro professor of environmental law, and inaugural faculty director of the Emmett Institute on Climate Change and the Environment, UCLA School of Law" (not as an industry consultant). We also seek correspondence relating to this event, specifically from or to (whether as to, cc or bcc), or using, anywhere in the correspondence be it the to, from, cc, bcc, Subject fields or body of the email: a) Frumhoff, b) McKibben, c) Kimmell, d) Union of Concerned Scientists, and/or e) UCS (including but not limited to in e.g., @ucsusa.org).

Records responsive to this request will be dated during a now-month period December 1, 2017 through January 31, 2018, inclusive."

Unfortunately, as of today, we are already at the end of the 14-day extension. Therefore, please make this a priority and reach out to Profs. Carlson and Horowitz first thing. Thereafter, we'll need to send out the estimated availability letter, which will probably be for the end of April.

Since the request is seeking emails of faculty members, OLA will need to be looped in, so please email Susan.

Please let me know if you have any questions.

Thanks,

Robert Baldrige  
Manager, UCLA Records Management and Information Practices  
(310) 794-8741

**From:** [Hawkins, Marisa](#)  
**To:** [Baldrige, Robert](#)  
**Cc:** [Donmez, Ayse](#)  
**Subject:** RE: New Assignment: 18-5367 -- CEI re Emails of Profs. Horowitz & Carlson  
**Date:** Thursday, March 01, 2018 9:10:00 AM

---

Hi Robert,

Got it, thanks!

~Marisa

---

**From:** Baldrige, Robert  
**Sent:** Thursday, March 01, 2018 12:54 AM  
**To:** Hawkins, Marisa <mhawkins@finance.ucla.edu>  
**Cc:** Donmez, Ayse <adonmez@finance.ucla.edu>  
**Subject:** New Assignment: 18-5367 -- CEI re Emails of Profs. Horowitz & Carlson

Hi Marisa,

Please handle this CPRA request from Competitive Enterprise Institute (CEI), which is seeking the following:

"I. copies of all correspondence and its accompanying information, including also any attachments, that were sent by, sent to (including copying, whether as cc: or bcc:) or otherwise were received or are possessed by UCLA School of Law's Cara Horowitz, and/or Ann Carlson, dated from March 1, 2016 to April 30, 2016, inclusive, which are also:

- a) to or from Shaun Goho, and/or
- b) which use any of the following terms, anywhere in the correspondence be it the to, from, cc, bcc, and/or Subject fields and/or body of the email: i) Harvard, ii) Pawa, iii) Frumhoff, iv) UCS, v) Eubanks, and/or vi) CIEL (these terms are not case sensitive).

II. Similarly, UCLA held a followup event, moderated by Ms. Horowitz with the participation of Prof. Carlson specifically as "Shirley Shapiro professor of environmental law, and inaugural faculty director of the Emmett Institute on Climate Change and the Environment, UCLA School of Law" (not as an industry consultant). We also seek correspondence relating to this event, specifically from or to (whether as to, cc or bcc), or using, anywhere in the correspondence be it the to, from, cc, bcc, Subject fields or body of the email: a) Frumhoff, b) McKibben, c) Kimmell, d) Union of Concerned Scientists, and/or e) UCS (including but not limited to in e.g., @ucsusa.org).

Records responsive to this request will be dated during a now-month period December

1, 2017 through January 31, 2018, inclusive."

Unfortunately, as of today, we are already at the end of the 14-day extension. Therefore, please make this a priority and reach out to Profs. Carlson and Horowitz first thing. Thereafter, we'll need to send out the estimated availability letter, which will probably be for the end of April.

Since the request is seeking emails of faculty members, OLA will need to be looped in, so please email Susan.

Please let me know if you have any questions.

Thanks,

Robert Baldrige  
Manager, UCLA Records Management and Information Practices  
(310) 794-8741

**From:** [Hawkins, Marisa](#)  
**To:** [Yzaguirre, Zaine](#)  
**Subject:** New contacts for 18-5367  
**Date:** Thursday, March 01, 2018 12:21:57 PM

---

Hi Zaine,

Could you please add Professors Cara Horowitz and Ann Carlson (both at the Law School) to this matter?

Thanks!  
Marisa

**From:** [Yzaguirre, Zaine](#)  
**To:** [Hawkins, Marisa](#)  
**Subject:** RE: New contacts for 18-5367  
**Date:** Thursday, March 01, 2018 2:21:51 PM

---

Done!

---

**From:** Hawkins, Marisa  
**Sent:** Thursday, March 01, 2018 12:22 PM  
**To:** Yzaguirre, Zaine <[zyzaguirre@finance.ucla.edu](mailto:zyzaguirre@finance.ucla.edu)>  
**Subject:** New contacts for 18-5367

Hi Zaine,

Could you please add Professors Cara Horowitz and Ann Carlson (both at the Law School) to this matter?

Thanks!  
Marisa

**From:** [Hawkins, Marisa](#)  
**To:** [Baldrige, Robert](#)  
**Subject:** FW: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)  
**Date:** Wednesday, March 07, 2018 6:08:00 PM

---

Hi Robert,

I did not want to bug you while you are out, but this is a yes/no question only, I promise. The two custodians on this matter want to do a call on Monday. Will 2pm Monday work for you? If so, I'll get back to them.

Thank you!  
Marisa

---

**From:** Carlson, Ann [mailto:[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)]  
**Sent:** Wednesday, March 07, 2018 12:30 PM  
**To:** Horowitz, Cara <[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)>  
**Cc:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>; Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** Re: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Monday would work for me or Tuesday after 3. Thanks!

On Mar 7, 2018, at 12:21 PM, Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)> wrote:

Thank you, Marisa. Ann and I would like to discuss this request with counsel in your office. Would that be possible? Perhaps sometime early next week?

I am relatively free Monday afternoon (except from 3pm-3:30) and Tuesday afternoon after 1:30.

Thanks,  
Cara

Cara Horowitz  
Andrew Sabin Family Foundation Co-Executive Director  
Emmett Institute on Climate Change and the Environment  
UCLA School of Law  
Ph (310) 206-4033  
[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)  
[www.law.ucla.edu/emmett](http://www.law.ucla.edu/emmett)

---

**From:** Hawkins, Marisa [<mailto:mhawkins@finance.ucla.edu>]  
**Sent:** Thursday, March 1, 2018 12:02 PM  
**To:** Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)>; Carlson, Ann <[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Dear Professor Horowitz and Professor Carlson,

My name is Marisa Hawkins and I am a staff member at UCLA Information Practices, working under Robert Baldrige. Mr. Baldrige recommended that I reach out to you because we recently received the attached request under the California Public Records Act (CPRA) from Christopher C. Horner, a Senior Fellow at the Competitive Enterprise Institute.

The request is somewhat involved, so I have summarized it below. Briefly, it is seeking:

1. **Emails to or from Professor Horowitz and/or Professor Carlson, dated March 1, 2016 through April 30, 2016, meeting any of the following criteria:**
  - a. **That are to or from Shaun Goho; or**
  - b. **That contain any of the following terms:**
    - i. **Harvard**
    - ii. **Pawa**
    - iii. **Frumhoff**
    - iv. **UCS**
    - v. **Eubanks**
    - vi. **CIEL**
2. **Emails to or from Professor Horowitz and/or Professor Carlson, dated December 1, 2017 through January 31, 2018, meeting any of the following criteria:**
  - a. **That relate to an event (date not specified by the requester) at UCLA, which followed up on an April 25, 2016 event at Harvard Law School; or**
  - b. **That contain any of the following terms:**
    - i. **Frumhoff**
    - ii. **McKibbon**
    - iii. **Kimmell**
    - iv. **Union of Concerned Scientists**
    - v. **UCS**
    - vi. **@ucsusa.org**

Would you be able to provide any responsive emails to any or all of the above

requests?

Please know that the Office of Legal Affairs (OLA) is already aware of this request and that any responsive records provided will be thoroughly reviewed and vetted with the input of OLA and redacted and/or withheld where possible, pursuant to the legal exemptions to disclosure under CPRA.

For your reference, I have included our guidelines regarding the collection and forwarding of responsive emails. Please feel free to contact me if you have any questions or concerns.

Best regards,

**Marisa Hawkins**

Senior Public Records Analyst

UCLA Information Practices

(310) 206-4159

[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

**From:** [Baldrige, Robert](#)  
**To:** [Hawkins, Marisa](#)  
**Subject:** Re: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)  
**Date:** Wednesday, March 07, 2018 8:09:03 PM

---

Sure, works for me. Thanks!

---

**From:** Hawkins, Marisa  
**Sent:** Wednesday, March 7, 2018 6:08 PM  
**To:** Baldrige, Robert  
**Subject:** FW: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Hi Robert,

I did not want to bug you while you are out, but this is a yes/no question only, I promise. The two custodians on this matter want to do a call on Monday. Will 2pm Monday work for you? If so, I'll get back to them.

Thank you!  
Marisa

---

**From:** Carlson, Ann [mailto:[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)]  
**Sent:** Wednesday, March 07, 2018 12:30 PM  
**To:** Horowitz, Cara <[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)>  
**Cc:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>; Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** Re: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Monday would work for me or Tuesday after 3. Thanks!

On Mar 7, 2018, at 12:21 PM, Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)> wrote:

Thank you, Marisa. Ann and I would like to discuss this request with counsel in your office. Would that be possible? Perhaps sometime early next week?

I am relatively free Monday afternoon (except from 3pm-3:30) and Tuesday afternoon after 1:30.

Thanks,  
Cara

Cara Horowitz  
Andrew Sabin Family Foundation Co-Executive Director  
Emmett Institute on Climate Change and the Environment  
UCLA School of Law  
Ph (310) 206-4033  
[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)  
[www.law.ucla.edu/emmett](http://www.law.ucla.edu/emmett)

---

**From:** Hawkins, Marisa [<mailto:mhawkins@finance.ucla.edu>]  
**Sent:** Thursday, March 1, 2018 12:02 PM  
**To:** Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)>; Carlson, Ann <[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Dear Professor Horowitz and Professor Carlson,

My name is Marisa Hawkins and I am a staff member at UCLA Information Practices, working under Robert Baldrige. Mr. Baldrige recommended that I reach out to you because we recently received the attached request under the California Public Records Act (CPRA) from Christopher C. Horner, a Senior Fellow at the Competitive Enterprise Institute.

The request is somewhat involved, so I have summarized it below. Briefly, it is seeking:

1. **Emails to or from Professor Horowitz and/or Professor Carlson, dated March 1, 2016 through April 30, 2016, meeting any of the following criteria:**
  - a. **That are to or from Shaun Goho; or**
  - b. **That contain any of the following terms:**
    - i. **Harvard**
    - ii. **Pawa**
    - iii. **Frumhoff**
    - iv. **UCS**

- v. **Eubanks**
  - vi. **CIEL**
2. **Emails to or from Professor Horowitz and/or Professor Carlson, dated December 1, 2017 through January 31, 2018, meeting any of the following criteria:**
- a. **That relate to an event (date not specified by the requester) at UCLA, which followed up on an April 25, 2016 event at Harvard Law School; or**
  - b. **That contain any of the following terms:**
    - i. **Frumhoff**
    - ii. **McKibbon**
    - iii. **Kimmell**
    - iv. **Union of Concerned Scientists**
    - v. **UCS**
    - vi. **@ucsusa.org**

Would you be able to provide any responsive emails to any or all of the above requests?

Please know that the Office of Legal Affairs (OLA) is already aware of this request and that any responsive records provided will be thoroughly reviewed and vetted with the input of OLA and redacted and/or withheld where possible, pursuant to the legal exemptions to disclosure under CPRA.

For your reference, I have included our guidelines regarding the collection and forwarding of responsive emails. Please feel free to contact me if you have any questions or concerns.

Best regards,

**Marisa Hawkins**

Senior Public Records Analyst

UCLA Information Practices

(310) 206-4159

[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

**From:** [Hawkins, Marisa](#)  
**To:** [Baldridge, Robert](#); [Carlson, Ann E.](#); [Horowitz, Cara](#)  
**Subject:** Call re PRA Request #18-5367

---

## Hawkins, Marisa

---

**From:** Baldrige, Robert  
**Sent:** Monday, March 12, 2018 10:31 AM  
**To:** Hawkins, Marisa  
**Subject:** Accepted: Call re PRA Request #18-5367

**From:** [Baldrige, Robert](#)  
**To:** [Hawkins, Marisa](#)  
**Subject:** Automatic reply: PRA request Horowitz 18-5367  
**Date:** Tuesday, April 03, 2018 9:34:07 AM

---

I am out of the office on Tuesday, April 3, with no access to email. If you are submitting a public records request, please forward it to [records@ucla.edu](mailto:records@ucla.edu). If you need immediate assistance with a matter, please either email that same address or call (310) 794-8741, and someone will be able to help you. If you need assistance with a Records Management issue, please contact them at (310) 794-2600. Otherwise I will respond to your email as soon as I can upon my return on Wednesday.

Best regards,  
Robert Baldrige

**From:** [Hawkins, Marisa](#)  
**To:** [Yzaguirre, Zaine](#)  
**Subject:** Emails to convert for 18-5367  
**Date:** Tuesday, April 03, 2018 10:19:00 AM

---

Hi Zaine,

Could you please convert the emails in the “Ann Carlson Emails” folder, which is in the Outlook folder for this matter. Please name the converted docs “Ann Carlson Emails (18-5367)” and save to the S:drive – Competitive Enterprise Institute – RDOC – ORIGINALS

Thanks!

**Marisa Hawkins**

Senior Public Records Analyst  
UCLA Information Practices  
(310) 206-4159  
[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

**From:** [Yzaguirre, Zaine](#)  
**To:** [Hawkins, Marisa](#)  
**Subject:** RE: Emails to convert for 18-5367  
**Date:** Tuesday, April 03, 2018 4:02:33 PM

---

Done!

---

**From:** Hawkins, Marisa  
**Sent:** Tuesday, April 03, 2018 10:19 AM  
**To:** Yzaguirre, Zaine <[zyzaguirre@finance.ucla.edu](mailto:zyzaguirre@finance.ucla.edu)>  
**Subject:** Emails to convert for 18-5367

Hi Zaine,

Could you please convert the emails in the “Ann Carlson Emails” folder, which is in the Outlook folder for this matter. Please name the converted docs “Ann Carlson Emails (18-5367)” and save to the S:drive – Competitive Enterprise Institute – RDOC – ORIGINALS

Thanks!

**Marisa Hawkins**

Senior Public Records Analyst  
UCLA Information Practices  
(310) 206-4159  
[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

**From:** [Hawkins, Marisa](#)  
**To:** [Yzaguirre, Zaine](#)  
**Subject:** RE: Emails to convert for 18-5367  
**Date:** Tuesday, April 03, 2018 4:18:00 PM

---

Thank you!

---

**From:** Yzaguirre, Zaine  
**Sent:** Tuesday, April 03, 2018 4:03 PM  
**To:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>  
**Subject:** RE: Emails to convert for 18-5367

Done!

---

**From:** Hawkins, Marisa  
**Sent:** Tuesday, April 03, 2018 10:19 AM  
**To:** Yzaguirre, Zaine <[zyzaguirre@finance.ucla.edu](mailto:zyzaguirre@finance.ucla.edu)>  
**Subject:** Emails to convert for 18-5367

Hi Zaine,

Could you please convert the emails in the "Ann Carlson Emails" folder, which is in the Outlook folder for this matter. Please name the converted docs "Ann Carlson Emails (18-5367)" and save to the S:drive – Competitive Enterprise Institute – RDOC – ORIGINALS

Thanks!

**Marisa Hawkins**

Senior Public Records Analyst  
UCLA Information Practices  
(310) 206-4159  
[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

**From:** [Hawkins, Marisa](#)  
**To:** [Yzaguirre, Zaine](#)  
**Subject:** Emails to convert for 18-5367  
**Date:** Monday, April 23, 2018 2:43:00 PM

---

Hi Zaine,

Could you please convert the emails in the "Cara Horowitz Emails - Harvard" folder, which is in the Outlook folder for this matter. Please name the converted docs "Cara Horowitz Emails - Harvard (18-5367)" and save to the S:drive – Competitive Enterprise Institute – RDOC – ORIGINALS

Thanks!

**Marisa Hawkins**

Senior Public Records Analyst  
UCLA Information Practices  
(310) 206-4159  
[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

**From:** [Yzaguirre, Zaine](#)  
**To:** [Hawkins, Marisa](#)  
**Subject:** RE: Emails to convert for 18-5367  
**Date:** Monday, April 23, 2018 3:06:57 PM

---

Done!  
-Zaine

---

**From:** Hawkins, Marisa  
**Sent:** Monday, April 23, 2018 2:43 PM  
**To:** Yzaguirre, Zaine <[zyzaguirre@finance.ucla.edu](mailto:zyzaguirre@finance.ucla.edu)>  
**Subject:** Emails to convert for 18-5367

Hi Zaine,

Could you please convert the emails in the "Cara Horowitz Emails - Harvard" folder, which is in the Outlook folder for this matter. Please name the converted docs "Cara Horowitz Emails - Harvard (18-5367)" and save to the S:drive – Competitive Enterprise Institute – RDOC – ORIGINALS

Thanks!

**Marisa Hawkins**

Senior Public Records Analyst  
UCLA Information Practices  
(310) 206-4159  
[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

**From:** [Yzaguirre, Zaine](#)  
**To:** [Baldrige, Robert](#); [Donmez, Ayse](#)  
**Subject:** Logged In PRR # 18-5666  
**Date:** Monday, May 21, 2018 5:12:39 PM

---

FYI

I have logged PRR # 18-5666 from Competitive Enterprise Institute regard emails between the UCLA Law School's Cara Horowitz and Ann Carlson from 5/1/16. I will prepare an Ack Letter asap. Please let me know if there is anything else I can do to assist with this matter.

Best,

**Zaine Yzaguirre**

*Office Coordinator*

*UCLA Information Practices*

*(310) 794-8741*

[zyzaguirre@finance.ucla.edu](mailto:zyzaguirre@finance.ucla.edu)

**From:** [Donmez, Ayse](#)  
**To:** [Hawkins, Marisa](#)  
**Cc:** [Baldrige, Robert](#)  
**Subject:** New Assignment - CPRA Request from Competitive Enterprise Institute -2 (18-5666)  
**Date:** Tuesday, May 22, 2018 11:43:20 AM  
**Attachments:** [Request \(18-5666\).PDF](#)

---

Dear Marisa,

Please handle the attached CPRA request from the Competitive Enterprise Institute which is similar to the one you are currently handling (18-5367). Note though some of the keywords and the date range is different.

While the previous request date range was March 1, 2016 to April 30, 2016, the current request date range is "from May 1, 2016 through the date you process this request, inclusive". Also, some of the keywords included in the previous request vary i.e. McKibben, Kimmell, ucsusa.org appear as new keywords.

The custodians would be the same though as that portion of the requests are the same. Also please loop in OLA per the protocols.

Please let us know if you have any questions.

Thanks,

Ayse G. Donmez  
Assistant Manager, UCLA Information Practices  
(310) 794-8741

**From:** [Chris Horner](#)  
**To:** [records@ucla.edu](mailto:records@ucla.edu)  
**Subject:** REQUEST UNDER CALIFORNIA'S PUBLIC RECORDS ACT -- certain Horowitz, Carlson correspondence  
**Date:** Monday, May 21, 2018 2:53:36 PM  
**Attachments:** [CEI UCLA Horowitz Carlson UCS et al PRA request.pdf](#)

---

Please see the attached.

1310 L Street, NW, 7th Floor  
Washington, DC 20005  
cei.org

202 331 1010 *main*  
202 331 0640 *fax*



## REQUEST UNDER CALIFORNIA'S PUBLIC RECORDS ACT

May 21, 2018

Records Management & Information Practices  
10920 Wilshire Boulevard  
Suite 530  
Los Angeles, CA 90024-6541

**BY ELECTRONIC MAIL** — [records@ucla.edu](mailto:records@ucla.edu)

UCLA Records Management Officer,

On behalf of the Competitive Enterprise Institute (CEI), a non-profit public policy institute in Washington, DC and pursuant to the California Government Code §§ 6250 *et. seq.*, please provide us within 10 business days copies of all correspondence and its accompanying information<sup>1</sup>, including also any attachments, that were sent by, sent to (including copying, whether as cc: or bcc:) or otherwise were received or are possessed by UCLA School of Law's **Cara Horowitz**, and/or **Ann Carlson**, dated from **May 1, 2016** through the date you process this request, inclusive, which are also:

- a) to or from Shaun Goho, *and/or*
- b) which use any of the following terms, *anywhere* in the correspondence be it the to, from, cc, bcc, and/or Subject fields and/or body of the email or attachments: i) Harvard, ii) Pawa, iii) Eubanks, iv) McKibben, v) Kimmell, vi) "Union of Concerned Scientists", and/or vii) @ucsusa.org. None of these terms are case sensitive.

---

<sup>1</sup> This includes public records, and associated public information, see discussion of Data Delivery Standards, *infra*.

1310 L Street, NW, 7th Floor  
Washington, DC 20005  
cei.org

202 331 1010 *main*  
202 331 0640 *fax*



Public records show that Professors Horowitz and Carlson are using their positions at your public university to coordinate with certain activists groups in organizing and pursuing law enforcement and civil investigations and litigation against private opponents of a particular political agenda. We seek correspondence and other records illuminating this use of a public university faculty position and resources.

**Please consider as responsive entire email “threads”** containing any information responsive to this request, regardless whether any part of that thread falls outside the cited search parameters.

**We request records on the University’s system**, e.g., its backend logs, not those which survive on a faculty member’s own machine or account.

**We do not demand your Office produce requested information in any particular form, instead we request records in their native form, with specific reference to the U.S. Securities and Exchange Commission Data Delivery Standards.<sup>2</sup>** The covered information we seek is electronic information, this includes electronic *records*, and other public *information*.

To quote the SEC Data Delivery Standards, “Electronic files must be produced in their native format, i.e. the format in which they are ordinarily used and maintained during the normal course of business. For example, an MS Excel file must be produced as an MS Excel file rather than an image of a spreadsheet. *(Note: An Adobe PDF file is not considered a native file unless the document was initially created as a PDF.)* (emphases in original).

---

<sup>2</sup> <https://www.sec.gov/divisions/enforce/datadeliverystandards.pdf>



In many native-format productions, certain public information remains contained in the record (e.g., metadata). Under the same standards, to ensure production of all information requested, if your production will be de-duplicated it is vital that you 1) preserve any unique metadata associated with the duplicate files, for example, custodian name, and, 2) make that unique metadata part of your production.

Native file productions may be produced without load files. However, native file productions must maintain the integrity of the original meta data, and must be produced as they are maintained in the normal course of business and organized by custodian-named file folders. A separate folder should be provided for each custodian.

In the event that necessity requires your Office to produce a PDF file, due to your normal program for redacting certain information and such that native files cannot be produced as they are maintained in the normal course of business, in order to provide all requested information each PDF file should be produced in separate folders named by the custodian, *and* accompanied by a load file to ensure the requested information appropriate for that discrete record is associated with that record. The required fields and format of the data to be provided within the load file can be found in Addendum A of the above-cited SEC Data Standards. All produced PDFs must be text searchable.

In the context of our experience with responsive agencies taking the effort to physically print, then (often, poorly) scan *electronic* mail into (typically, non-searchable) PDF files, we note that production of electronic records necessitates no such additional time, effort or other

1310 L Street, NW, 7th Floor  
Washington, DC 20005  
cei.org

202 331 1010 *main*  
202 331 0640 *fax*



resources, and no photocopying expense. Any such effort as described is most reasonably viewed as an effort to frustrate the requester's use of the public information.

We understand we owe the office the cost of material, required to satisfy this request. We agree to pay legitimate expenses up to \$150.00. If you estimate costs will exceed that please notify us immediately and break down the expected costs.

The undersigned do not seek the information for a commercial purpose. CEI is organized and recognized by the Internal Revenue Service as a 501(c)3 educational organization. As such, it has no commercial interest possible in these records.

Also, CEI is a media organization, which the federal government has already acknowledged is the case for purposes of the federal FOIA.<sup>3</sup>

As such, we request a waiver of any fees involved, as release of these records is in the public interest and the Office is permitted to and does exercise discretion in waiving or reducing fees on that basis.

The campaign in which Profs. Carlson and Horowitz have involved themselves and the School using, and which they have participated in expressly on the basis of, their UCLA credential<sup>4</sup> is the subject of intense public, media, congressional oversight and now judicial

---

<sup>3</sup> See e.g., Department of the Treasury FOIA Nos. 2012-08-053, 2012-08-054.

<sup>4</sup> See, e.g., <https://law.ucla.edu/news-and-events/4065/2018/1/25/holding-fossil-fuel-companies-liable-for-climate-change-harms-in-california-c--law-science-and-justice---keynote-remarks-by-bill-mckibben/> and <https://blog.ucsusa.org/peter-frumhoff/scientists-state-prosecutors-fossil-fuel-companies-climate-accountability>.

1310 L Street, NW, 7th Floor  
Washington, DC 20005  
cei.org

202 331 1010 *main*  
202 331 0640 *fax*



interest<sup>5</sup> — which is indeed a principal objective of the campaign.<sup>6</sup> It involves third-parties and plainly no relevant privilege with the exception of possible personal contact information if that information is not already posted on the websites of various participating universities, pressure groups and the like. The requested information is of critical importance to the nonprofit policy advocacy groups engaged on these relevant issues, news media covering the issues, and any others concerned with government activities on this critical subject, or as the United States Supreme Court once noted in the context of the federal FOIA, what their government, which under open records laws includes publicly funded academic institutions, is up to.

If you have any questions please do not hesitate to contact me. We look forward to your timely response.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "C. Horner", with a long, sweeping horizontal line extending to the right.

Christopher C. Horner  
Senior Fellow, CEI  
[chris.horner@cei.org](mailto:chris.horner@cei.org)  
202.262.4458

---

<sup>5</sup> See, e.g., John O'Brien, "Exxon Prepares To Sue California Cities, Says They Contradict Themselves On Climate Change", *Forbes*, January 8, 2018, <https://www.forbes.com/sites/legalnewsline/2018/01/08/exxon-prepares-to-sue-california-cities-say-they-contradict-themselves-on-climate-change/amp/>; Andrew Scurria, "California Municipalities' Debt Disclosures Contrast With Climate Warnings", *Wall Street Journal*, January 8, 2018, <https://www.wsj.com/articles/california-municipalities-debt-disclosures-contrast-with-climate-warnings-1515456551>; see also <https://www.courthousenews.com/wp-content/uploads/2018/01/ExxonDepositions.pdf>.

<sup>6</sup> See, e.g., <http://eidclimate.org/video-attorney-admitted-press-coverage-might-important-winning-climate-lawsuits/>.

**From:** [Hawkins, Marisa](#)  
**To:** [Donmez, Ayse](#)  
**Cc:** [Baldrige, Robert](#)  
**Subject:** RE: New Assignment - CPRA Request from Competitive Enterprise Institute -2 (18-5666)  
**Date:** Tuesday, May 22, 2018 2:27:00 PM

---

Got it, thanks.

~Marisa

**Marisa Hawkins**

Senior Public Records Analyst  
UCLA Information Practices  
(310) 206-4159  
[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

---

**From:** Donmez, Ayse  
**Sent:** Tuesday, May 22, 2018 11:43 AM  
**To:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>  
**Subject:** New Assignment - CPRA Request from Competitive Enterprise Institute -2 (18-5666)

Dear Marisa,

Please handle the attached CPRA request from the Competitive Enterprise Institute which is similar to the one you are currently handling (18-5367). Note though some of the keywords and the date range is different.

While the previous request date range was March 1, 2016 to April 30, 2016, the current request date range is "from May 1, 2016 through the date you process this request, inclusive". Also, some of the keywords included in the previous request vary i.e. McKibben, Kimmell, ucsusa.org appear as new keywords.

The custodians would be the same though as that portion of the requests are the same. Also please loop in OLA per the protocols.

Please let us know if you have any questions.

Thanks,

Ayse G. Donmez  
Assistant Manager, UCLA Information Practices  
(310) 794-8741

**From:** [Hawkins, Marisa](#)  
**To:** [Yzaguirre, Zaine](#)  
**Subject:** Converting emails for 18-5367  
**Date:** Tuesday, July 10, 2018 9:02:59 PM

---

Hi Zaine,

Could you please convert and combine the emails in the following Outlook folder: 18-5367: Cara Horowitz Emails – UCLA. You don't have to do the emails in the non-responsive sub-folder. Once they are converted, please save them to the S:drive : Competitive Enterprise Institute : RDOC : ORIGINALS, and name the file Cara Horowitz Emails – UCLA (18-5367).

Let me know if you have any questions and thanks!  
Marisa

**Marisa Hawkins**

Senior Public Records Analyst  
UCLA Information Practices  
(310) 206-4159  
[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

**From:** [Yzaguirre, Zaine](#)  
**To:** [Hawkins, Marisa](#)  
**Subject:** RE: Converting emails for 18-5367  
**Date:** Wednesday, July 11, 2018 12:05:38 PM

---

Done!

---

**From:** Hawkins, Marisa  
**Sent:** Tuesday, July 10, 2018 9:03 PM  
**To:** Yzaguirre, Zaine <[zyzaguirre@finance.ucla.edu](mailto:zyzaguirre@finance.ucla.edu)>  
**Subject:** Converting emails for 18-5367

Hi Zaine,

Could you please convert and combine the emails in the following Outlook folder: 18-5367: Cara Horowitz Emails – UCLA. You don't have to do the emails in the non-responsive sub-folder. Once they are converted, please save them to the S:drive : Competitive Enterprise Institute : RDOC : ORIGINALS, and name the file Cara Horowitz Emails – UCLA (18-5367).

Let me know if you have any questions and thanks!  
Marisa

**Marisa Hawkins**

Senior Public Records Analyst  
UCLA Information Practices  
(310) 206-4159  
[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

**From:** [Hawkins, Marisa](#)  
**To:** [Yzaguirre, Zaine](#)  
**Subject:** RE: Converting emails for 18-5367  
**Date:** Wednesday, July 11, 2018 3:06:00 PM

---

Thank you!

**Marisa Hawkins**

Senior Public Records Analyst  
UCLA Information Practices  
(310) 206-4159  
[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

---

**From:** Yzaguirre, Zaine  
**Sent:** Wednesday, July 11, 2018 12:06 PM  
**To:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>  
**Subject:** RE: Converting emails for 18-5367

Done!

---

**From:** Hawkins, Marisa  
**Sent:** Tuesday, July 10, 2018 9:03 PM  
**To:** Yzaguirre, Zaine <[zyzaguirre@finance.ucla.edu](mailto:zyzaguirre@finance.ucla.edu)>  
**Subject:** Converting emails for 18-5367

Hi Zaine,

Could you please convert and combine the emails in the following Outlook folder: 18-5367: Cara Horowitz Emails – UCLA. You don't have to do the emails in the non-responsive sub-folder. Once they are converted, please save them to the S:drive : Competitive Enterprise Institute : RDOC : ORIGINALS, and name the file Cara Horowitz Emails – UCLA (18-5367).

Let me know if you have any questions and thanks!

Marisa

**Marisa Hawkins**

Senior Public Records Analyst  
UCLA Information Practices  
(310) 206-4159  
[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

**From:** [Baldrige, Robert](#)  
**To:** [Hawkins, Marisa](#)  
**Cc:** [Donmez, Ayse](#)  
**Subject:** Fw: Competitive Enterprise Institute Request #2 Re Emails of Professors Horowitz and Carlson (18-5666)  
**Date:** Friday, November 02, 2018 3:45:13 PM

---

FYI

---

**From:** Carlson, Ann <carlson@law.ucla.edu>  
**Sent:** Friday, November 2, 2018 3:44 PM  
**To:** Baldrige, Robert  
**Subject:** Automatic reply: Competitive Enterprise Institute Request #2 Re Emails of Professors Horowitz and Carlson (18-5666)

Thank you for your email.

I will be out of the office with only intermittent access to email until November 12. If you need immediate assistance please contact Jessica Sonley at sonley@law.ucla.edu. Otherwise, I will respond as soon as possible after I return. If you don't hear back from me by the end of the week of November 12, please re-send your email.

Thanks and all best,

Ann

**From:** [Hawkins, Marisa](#)  
**To:** [Malone, Chelsea](#)  
**Subject:** Instructions for 18-5367 PDF conversion project  
**Date:** Wednesday, November 21, 2018 12:07:03 PM

---

Instructions for 18-5367 PDF conversion project:

1. Location of emails: S drive → Time Matters → Competitive Enterprise Institute → RDOC → CARA HOROWITZ EMAILS → HOROWITZ EMAILS – HARVARD
2. Process
  - a. In the “HOROWITZ EMAILS – HARVARD” folder, you will see emails in the form of Outlook files (looks like a yellow envelope)
  - b. Double click on an email to open it
  - c. Once it is open, go to File and choose Print
  - d. On the print screen, under the “Printer” dropdown menu, choose “Adobe PDF”
  - e. Then click Print
  - f. A new window will open, asking you where to save the PDF and what to name it
  - g. Be sure that the Folder it will be saved to is HOROWITZ EMAILS – HARVARD – you can check that by looking at the top line of the window
  - h. The new PDF will, by default, be named Memo Style – we don’t want that. You will have to rename the PDF to have the exact same name as the email you were converting.
  - i. While the location/naming window is up, you will have to go to the HOROWITZ EMAILS – HARVARD folder and copy the name of the email you were working on, then paste it into the name field for the new PDF.
  - j. Then click save, and the PDF version should appear right below the Outlook version of the email in HOROWITZ EMAILS – HARVARD.
  - k. Repeat forever until all of them are done...
3. Then do the same thing for all the emails in the following folder:
  - a. S drive → Time Matters → Competitive Enterprise Institute → RDOC → CARA HOROWITZ EMAILS → HOROWITZ EMAILS – UCLA

Thank you!  
Marisa

**Marisa Hawkins**

Senior Public Records Analyst  
UCLA Information Practices  
(310) 206-4159  
[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

**From:** [Hawkins, Marisa](#)  
**To:** [Popat, Salima](#)  
**Subject:** test  
**Date:** Friday, November 30, 2018 12:12:19 PM

---

<https://app.box.com/s/bngvujhv499z4gxo3ghljs4r5o13iv1h>

**Marisa Hawkins**

Senior Public Records Analyst  
UCLA Information Practices  
(310) 206-4159  
[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

**From:** [Hawkins, Marisa](#)  
**To:** [Popat, Salima](#)  
**Subject:** TEST  
**Date:** Friday, December 21, 2018 3:09:50 PM

---

<https://app.box.com/s/hewn9xgzapwb8uzkbb18myt6vj6hm34q>

**Marisa Hawkins**

Senior Public Records Analyst

UCLA Information Practices

(310) 206-4159

[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

**From:** [Hawkins, Marisa](#)  
**To:** [Popat, Salima](#)  
**Subject:** test  
**Date:** Thursday, January 31, 2019 4:23:36 PM

---

<https://app.box.com/s/7gm1sq4sykqinps8rbmuuyvn3cmon0gt>

<https://app.box.com/s/egvq1dmc67h3tjbhiyqatjkh7t851my4>

**Marisa Hawkins**

Senior Public Records Analyst  
UCLA Information Practices  
(310) 206-4159  
[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

**From:** [Hawkins, Marisa](#)  
**To:** [Carlson, Ann](#); [Horowitz, Cara](#)  
**Cc:** [Baldridge, Robert](#); [Donmez, Ayse](#)  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)  
**Date:** Thursday, March 08, 2018 9:11:00 AM

---

Dear Cara and Ann,

Would Monday at 2pm work for you both?

Thanks,  
Marisa

---

**From:** Carlson, Ann [mailto:[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)]  
**Sent:** Wednesday, March 07, 2018 12:30 PM  
**To:** Horowitz, Cara <[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)>  
**Cc:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>; Baldridge, Robert <[rbaldridge@finance.ucla.edu](mailto:rbaldridge@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** Re: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Monday would work for me or Tuesday after 3. Thanks!

On Mar 7, 2018, at 12:21 PM, Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)> wrote:

Thank you, Marisa. Ann and I would like to discuss this request with counsel in your office. Would that be possible? Perhaps sometime early next week?

I am relatively free Monday afternoon (except from 3pm-3:30) and Tuesday afternoon after 1:30.

Thanks,  
Cara

Cara Horowitz  
Andrew Sabin Family Foundation Co-Executive Director  
Emmett Institute on Climate Change and the Environment  
UCLA School of Law  
Ph (310) 206-4033  
[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)  
[www.law.ucla.edu/emmett](http://www.law.ucla.edu/emmett)

**From:** Hawkins, Marisa [<mailto:mhawkins@finance.ucla.edu>]  
**Sent:** Thursday, March 1, 2018 12:02 PM  
**To:** Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)>; Carlson, Ann <[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Dear Professor Horowitz and Professor Carlson,

My name is Marisa Hawkins and I am a staff member at UCLA Information Practices, working under Robert Baldrige. Mr. Baldrige recommended that I reach out to you because we recently received the attached request under the California Public Records Act (CPRA) from Christopher C. Horner, a Senior Fellow at the Competitive Enterprise Institute.

The request is somewhat involved, so I have summarized it below. Briefly, it is seeking:

1. **Emails to or from Professor Horowitz and/or Professor Carlson, dated March 1, 2016 through April 30, 2016, meeting any of the following criteria:**
  - a. **That are to or from Shaun Goho; or**
  - b. **That contain any of the following terms:**
    - i. **Harvard**
    - ii. **Pawa**
    - iii. **Frumhoff**
    - iv. **UCS**
    - v. **Eubanks**
    - vi. **CIEL**
2. **Emails to or from Professor Horowitz and/or Professor Carlson, dated December 1, 2017 through January 31, 2018, meeting any of the following criteria:**
  - a. **That relate to an event (date not specified by the requester) at UCLA, which followed up on an April 25, 2016 event at Harvard Law School; or**
  - b. **That contain any of the following terms:**
    - i. **Frumhoff**
    - ii. **McKibbon**
    - iii. **Kimmell**
    - iv. **Union of Concerned Scientists**
    - v. **UCS**
    - vi. **@ucsusa.org**

Would you be able to provide any responsive emails to any or all of the above requests?

Please know that the Office of Legal Affairs (OLA) is already aware of this request and that any responsive records provided will be thoroughly reviewed and vetted with the input of OLA and redacted and/or withheld where possible, pursuant to the legal exemptions to disclosure under CPRA.

For your reference, I have included our guidelines regarding the collection and forwarding of responsive emails. Please feel free to contact me if you have any questions or concerns.

Best regards,

**Marisa Hawkins**

Senior Public Records Analyst

UCLA Information Practices

(310) 206-4159

[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

**From:** [Horowitz, Cara](#)  
**To:** [Hawkins, Marisa](#); [Carlson, Ann E.](#)  
**Cc:** [Baldrige, Robert](#); [Donmez, Ayse](#)  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)  
**Date:** Thursday, March 08, 2018 10:28:31 AM

---

Yes for me, thanks. Should we do it by phone?

---

**From:** Hawkins, Marisa [mailto:mhawkins@finance.ucla.edu]  
**Sent:** Thursday, March 8, 2018 9:11 AM  
**To:** Carlson, Ann <carlson@law.ucla.edu>; Horowitz, Cara <HOROWITZ@law.ucla.edu>  
**Cc:** Baldrige, Robert <rbaldrige@finance.ucla.edu>; Donmez, Ayse <adonmez@finance.ucla.edu>  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Dear Cara and Ann,

Would Monday at 2pm work for you both?

Thanks,  
Marisa

---

**From:** Carlson, Ann [mailto:carlson@law.ucla.edu]  
**Sent:** Wednesday, March 07, 2018 12:30 PM  
**To:** Horowitz, Cara <horowitz@law.ucla.edu>  
**Cc:** Hawkins, Marisa <mhawkins@finance.ucla.edu>; Baldrige, Robert <rbaldrige@finance.ucla.edu>; Donmez, Ayse <adonmez@finance.ucla.edu>  
**Subject:** Re: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Monday would work for me or Tuesday after 3. Thanks!

On Mar 7, 2018, at 12:21 PM, Horowitz, Cara <HOROWITZ@law.ucla.edu> wrote:

Thank you, Marisa. Ann and I would like to discuss this request with counsel in your office. Would that be possible? Perhaps sometime early next week?

I am relatively free Monday afternoon (except from 3pm-3:30) and Tuesday afternoon after 1:30.

Thanks,  
Cara

Cara Horowitz  
Andrew Sabin Family Foundation Co-Executive Director  
Emmett Institute on Climate Change and the Environment  
UCLA School of Law

Ph (310) 206-4033  
[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)  
[www.law.ucla.edu/emmett](http://www.law.ucla.edu/emmett)

---

**From:** Hawkins, Marisa [<mailto:mhawkins@finance.ucla.edu>]  
**Sent:** Thursday, March 1, 2018 12:02 PM  
**To:** Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)>; Carlson, Ann <[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Dear Professor Horowitz and Professor Carlson,

My name is Marisa Hawkins and I am a staff member at UCLA Information Practices, working under Robert Baldrige. Mr. Baldrige recommended that I reach out to you because we recently received the attached request under the California Public Records Act (CPRA) from Christopher C. Horner, a Senior Fellow at the Competitive Enterprise Institute.

The request is somewhat involved, so I have summarized it below. Briefly, it is seeking:

1. **Emails to or from Professor Horowitz and/or Professor Carlson, dated March 1, 2016 through April 30, 2016, meeting any of the following criteria:**
  - a. **That are to or from Shaun Goho; or**
  - b. **That contain any of the following terms:**
    - i. **Harvard**
    - ii. **Pawa**
    - iii. **Frumhoff**
    - iv. **UCS**
    - v. **Eubanks**
    - vi. **CIEL**
2. **Emails to or from Professor Horowitz and/or Professor Carlson, dated December 1, 2017 through January 31, 2018, meeting any of the following criteria:**
  - a. **That relate to an event (date not specified by the requester) at UCLA, which followed up on an April 25, 2016 event at Harvard Law School; or**
  - b. **That contain any of the following terms:**
    - i. **Frumhoff**

- ii. **McKibbon**
- iii. **Kimmell**
- iv. **Union of Concerned Scientists**
- v. **UCS**
- vi. **@ucsusa.org**

Would you be able to provide any responsive emails to any or all of the above requests?

Please know that the Office of Legal Affairs (OLA) is already aware of this request and that any responsive records provided will be thoroughly reviewed and vetted with the input of OLA and redacted and/or withheld where possible, pursuant to the legal exemptions to disclosure under CPRA.

For your reference, I have included our guidelines regarding the collection and forwarding of responsive emails. Please feel free to contact me if you have any questions or concerns.

Best regards,

**Marisa Hawkins**

Senior Public Records Analyst  
UCLA Information Practices  
(310) 206-4159  
[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

**From:** [Carlson, Ann](#)  
**To:** [Horowitz, Cara](#); [Hawkins, Marisa](#)  
**Cc:** [Baldrige, Robert](#); [Donmez, Ayse](#)  
**Subject:** Re: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)  
**Date:** Thursday, March 08, 2018 11:39:08 AM

---

It also works for me and phone is fine for me (actually better).

Ann Carlson  
Shirley Shapiro Professor of Environmental Law  
Faculty Co-Director, Emmett Institute on Climate Change and the Environment  
UCLA School of Law  
(310) 206-9496

---

**From:** Horowitz, Cara  
**Sent:** Thursday, March 8, 2018 10:28:21 AM  
**To:** Hawkins, Marisa; Carlson, Ann  
**Cc:** Baldrige, Robert; Donmez, Ayse  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Yes for me, thanks. Should we do it by phone?

---

**From:** Hawkins, Marisa [<mailto:mhawkins@finance.ucla.edu>]  
**Sent:** Thursday, March 8, 2018 9:11 AM  
**To:** Carlson, Ann <[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)>; Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Dear Cara and Ann,

Would Monday at 2pm work for you both?

Thanks,  
Marisa

---

**From:** Carlson, Ann [<mailto:carlson@law.ucla.edu>]  
**Sent:** Wednesday, March 07, 2018 12:30 PM  
**To:** Horowitz, Cara <[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)>  
**Cc:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>; Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** Re: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Monday would work for me or Tuesday after 3. Thanks!

On Mar 7, 2018, at 12:21 PM, Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)> wrote:

Thank you, Marisa. Ann and I would like to discuss this request with counsel in your office. Would that be possible? Perhaps sometime early next week?

I am relatively free Monday afternoon (except from 3pm-3:30) and Tuesday afternoon after 1:30.

Thanks,  
Cara

Cara Horowitz  
Andrew Sabin Family Foundation Co-Executive Director  
Emmett Institute on Climate Change and the Environment  
UCLA School of Law  
Ph (310) 206-4033  
[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)  
[www.law.ucla.edu/emmett](http://www.law.ucla.edu/emmett)

---

**From:** Hawkins, Marisa [<mailto:mhawkins@finance.ucla.edu>]  
**Sent:** Thursday, March 1, 2018 12:02 PM  
**To:** Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)>; Carlson, Ann <[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Dear Professor Horowitz and Professor Carlson,

My name is Marisa Hawkins and I am a staff member at UCLA Information Practices, working under Robert Baldrige. Mr. Baldrige recommended that I reach out to you because we recently received the attached request under the California Public Records Act (CPRA) from Christopher C. Horner, a Senior Fellow at the Competitive Enterprise Institute.

The request is somewhat involved, so I have summarized it below. Briefly, it is seeking:

1. **Emails to or from Professor Horowitz and/or Professor Carlson, dated March 1, 2016 through April 30, 2016, meeting any of the following criteria:**
  - a. **That are to or from Shaun Goho; or**
  - b. **That contain any of the following terms:**

- i. **Harvard**
  - ii. **Pawa**
  - iii. **Frumhoff**
  - iv. **UCS**
  - v. **Eubanks**
  - vi. **CIEL**
2. **Emails to or from Professor Horowitz and/or Professor Carlson, dated December 1, 2017 through January 31, 2018, meeting any of the following criteria:**
- a. **That relate to an event (date not specified by the requester) at UCLA, which followed up on an April 25, 2016 event at Harvard Law School; or**
  - b. **That contain any of the following terms:**
    - i. **Frumhoff**
    - ii. **McKibbon**
    - iii. **Kimmell**
    - iv. **Union of Concerned Scientists**
    - v. **UCS**
    - vi. **@ucsusa.org**

Would you be able to provide any responsive emails to any or all of the above requests?

Please know that the Office of Legal Affairs (OLA) is already aware of this request and that any responsive records provided will be thoroughly reviewed and vetted with the input of OLA and redacted and/or withheld where possible, pursuant to the legal exemptions to disclosure under CPRA.

For your reference, I have included our guidelines regarding the collection and forwarding of responsive emails. Please feel free to contact me if you have any questions or concerns.

Best regards,

**Marisa Hawkins**  
Senior Public Records Analyst  
UCLA Information Practices  
(310) 206-4159  
[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

**From:** [Hawkins, Marisa](#)  
**To:** [Carlson, Ann](#); [Horowitz, Cara](#)  
**Cc:** [Baldrige, Robert](#); [Donmez, Ayse](#)  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)  
**Date:** Thursday, March 08, 2018 11:43:00 AM

---

That sounds good. We will call at 2pm on Monday – will we need to conference one of you in, or will you be together?

Thanks,  
Marisa

---

**From:** Carlson, Ann [mailto:[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)]  
**Sent:** Thursday, March 08, 2018 11:39 AM  
**To:** Horowitz, Cara <[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)>; Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** Re: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

It also works for me and phone is fine for me (actually better).

Ann Carlson  
Shirley Shapiro Professor of Environmental Law  
Faculty Co-Director, Emmett Institute on Climate Change and the Environment  
UCLA School of Law  
(310) 206-9496

---

**From:** Horowitz, Cara  
**Sent:** Thursday, March 8, 2018 10:28:21 AM  
**To:** Hawkins, Marisa; Carlson, Ann  
**Cc:** Baldrige, Robert; Donmez, Ayse  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Yes for me, thanks. Should we do it by phone?

---

**From:** Hawkins, Marisa [mailto:[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)]  
**Sent:** Thursday, March 8, 2018 9:11 AM  
**To:** Carlson, Ann <[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)>; Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Dear Cara and Ann,

Would Monday at 2pm work for you both?

Thanks,  
Marisa

---

**From:** Carlson, Ann [<mailto:carlson@law.ucla.edu>]  
**Sent:** Wednesday, March 07, 2018 12:30 PM  
**To:** Horowitz, Cara <[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)>  
**Cc:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>; Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** Re: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Monday would work for me or Tuesday after 3. Thanks!

On Mar 7, 2018, at 12:21 PM, Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)> wrote:

Thank you, Marisa. Ann and I would like to discuss this request with counsel in your office. Would that be possible? Perhaps sometime early next week?

I am relatively free Monday afternoon (except from 3pm-3:30) and Tuesday afternoon after 1:30.

Thanks,  
Cara

Cara Horowitz  
Andrew Sabin Family Foundation Co-Executive Director  
Emmett Institute on Climate Change and the Environment  
UCLA School of Law  
Ph (310) 206-4033  
[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)  
[www.law.ucla.edu/emmett](http://www.law.ucla.edu/emmett)

---

**From:** Hawkins, Marisa [<mailto:mhawkins@finance.ucla.edu>]  
**Sent:** Thursday, March 1, 2018 12:02 PM  
**To:** Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)>; Carlson, Ann <[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Dear Professor Horowitz and Professor Carlson,

My name is Marisa Hawkins and I am a staff member at UCLA Information Practices,

working under Robert Baldrige. Mr. Baldrige recommended that I reach out to you because we recently received the attached request under the California Public Records Act (CPRA) from Christopher C. Horner, a Senior Fellow at the Competitive Enterprise Institute.

The request is somewhat involved, so I have summarized it below. Briefly, it is seeking:

1. **Emails to or from Professor Horowitz and/or Professor Carlson, dated March 1, 2016 through April 30, 2016, meeting any of the following criteria:**
  - a. **That are to or from Shaun Goho; or**
  - b. **That contain any of the following terms:**
    - i. **Harvard**
    - ii. **Pawa**
    - iii. **Frumhoff**
    - iv. **UCS**
    - v. **Eubanks**
    - vi. **CIEL**
  
2. **Emails to or from Professor Horowitz and/or Professor Carlson, dated December 1, 2017 through January 31, 2018, meeting any of the following criteria:**
  - a. **That relate to an event (date not specified by the requester) at UCLA, which followed up on an April 25, 2016 event at Harvard Law School; or**
  - b. **That contain any of the following terms:**
    - i. **Frumhoff**
    - ii. **McKibbon**
    - iii. **Kimmell**
    - iv. **Union of Concerned Scientists**
    - v. **UCS**
    - vi. **@ucsusa.org**

Would you be able to provide any responsive emails to any or all of the above requests?

Please know that the Office of Legal Affairs (OLA) is already aware of this request and that any responsive records provided will be thoroughly reviewed and vetted with the input of OLA and redacted and/or withheld where possible, pursuant to the legal exemptions to disclosure under CPRA.

For your reference, I have included our guidelines regarding the collection and forwarding of responsive emails. Please feel free to contact me if you have any questions or concerns.

Best regards,

**Marisa Hawkins**

Senior Public Records Analyst

UCLA Information Practices

(310) 206-4159

[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

**From:** [Horowitz, Cara](#)  
**To:** [Hawkins, Marisa](#); [Carlson, Ann E.](#)  
**Cc:** [Baldrige, Robert](#); [Donmez, Ayse](#)  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)  
**Date:** Thursday, March 08, 2018 11:46:37 AM

---

Conference line is probably best (unless you'll be in the office and able to join me, Ann?). Thank you.

---

**From:** Hawkins, Marisa [mailto:[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)]  
**Sent:** Thursday, March 8, 2018 11:43 AM  
**To:** Carlson, Ann <[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)>; Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

That sounds good. We will call at 2pm on Monday – will we need to conference one of you in, or will you be together?

Thanks,  
Marisa

---

**From:** Carlson, Ann [mailto:[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)]  
**Sent:** Thursday, March 08, 2018 11:39 AM  
**To:** Horowitz, Cara <[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)>; Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** Re: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

It also works for me and phone is fine for me (actually better).

Ann Carlson  
Shirley Shapiro Professor of Environmental Law  
Faculty Co-Director, Emmett Institute on Climate Change and the Environment  
UCLA School of Law  
(310) 206-9496

---

**From:** Horowitz, Cara  
**Sent:** Thursday, March 8, 2018 10:28:21 AM  
**To:** Hawkins, Marisa; Carlson, Ann  
**Cc:** Baldrige, Robert; Donmez, Ayse  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Yes for me, thanks. Should we do it by phone?

---

**From:** Hawkins, Marisa [mailto:[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)]  
**Sent:** Thursday, March 8, 2018 9:11 AM  
**To:** Carlson, Ann <[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)>; Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>

**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Dear Cara and Ann,

Would Monday at 2pm work for you both?

Thanks,  
Marisa

---

**From:** Carlson, Ann [<mailto:carlson@law.ucla.edu>]  
**Sent:** Wednesday, March 07, 2018 12:30 PM  
**To:** Horowitz, Cara <[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)>  
**Cc:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>; Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** Re: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Monday would work for me or Tuesday after 3. Thanks!

On Mar 7, 2018, at 12:21 PM, Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)> wrote:

Thank you, Marisa. Ann and I would like to discuss this request with counsel in your office. Would that be possible? Perhaps sometime early next week?

I am relatively free Monday afternoon (except from 3pm-3:30) and Tuesday afternoon after 1:30.

Thanks,  
Cara

Cara Horowitz  
Andrew Sabin Family Foundation Co-Executive Director  
Emmett Institute on Climate Change and the Environment  
UCLA School of Law  
Ph (310) 206-4033  
[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)  
[www.law.ucla.edu/emmett](http://www.law.ucla.edu/emmett)

---

**From:** Hawkins, Marisa [<mailto:mhawkins@finance.ucla.edu>]  
**Sent:** Thursday, March 1, 2018 12:02 PM  
**To:** Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)>; Carlson, Ann <[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)>

**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>

**Subject:** Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Dear Professor Horowitz and Professor Carlson,

My name is Marisa Hawkins and I am a staff member at UCLA Information Practices, working under Robert Baldrige. Mr. Baldrige recommended that I reach out to you because we recently received the attached request under the California Public Records Act (CPRA) from Christopher C. Horner, a Senior Fellow at the Competitive Enterprise Institute.

The request is somewhat involved, so I have summarized it below. Briefly, it is seeking:

1. **Emails to or from Professor Horowitz and/or Professor Carlson, dated March 1, 2016 through April 30, 2016, meeting any of the following criteria:**
  - a. **That are to or from Shaun Goho; or**
  - b. **That contain any of the following terms:**
    - i. **Harvard**
    - ii. **Pawa**
    - iii. **Frumhoff**
    - iv. **UCS**
    - v. **Eubanks**
    - vi. **CIEL**
2. **Emails to or from Professor Horowitz and/or Professor Carlson, dated December 1, 2017 through January 31, 2018, meeting any of the following criteria:**
  - a. **That relate to an event (date not specified by the requester) at UCLA, which followed up on an April 25, 2016 event at Harvard Law School; or**
  - b. **That contain any of the following terms:**
    - i. **Frumhoff**
    - ii. **McKibbon**
    - iii. **Kimmell**
    - iv. **Union of Concerned Scientists**
    - v. **UCS**
    - vi. **@ucsusa.org**

Would you be able to provide any responsive emails to any or all of the above requests?

Please know that the Office of Legal Affairs (OLA) is already aware of this request and that any responsive records provided will be thoroughly reviewed and vetted with the

input of OLA and redacted and/or withheld where possible, pursuant to the legal exemptions to disclosure under CPRA.

For your reference, I have included our guidelines regarding the collection and forwarding of responsive emails. Please feel free to contact me if you have any questions or concerns.

Best regards,

**Marisa Hawkins**

Senior Public Records Analyst

UCLA Information Practices

(310) 206-4159

[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

**From:** [Carlson, Ann](#)  
**To:** [Horowitz, Cara](#); [Hawkins, Marisa](#)  
**Cc:** [Baldrige, Robert](#); [Donmez, Ayse](#)  
**Subject:** Re: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)  
**Date:** Thursday, March 08, 2018 11:51:07 AM

---

Not sure yet so conference line would be best. Thanks!

Ann Carlson  
Shirley Shapiro Professor of Environmental Law  
Faculty Co-Director, Emmett Institute on Climate Change and the Environment  
UCLA School of Law  
(310) 206-9496

---

**From:** Horowitz, Cara  
**Sent:** Thursday, March 8, 2018 11:46:31 AM  
**To:** Hawkins, Marisa; Carlson, Ann  
**Cc:** Baldrige, Robert; Donmez, Ayse  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Conference line is probably best (unless you'll be in the office and able to join me, Ann?). Thank you.

---

**From:** Hawkins, Marisa [<mailto:mhawkins@finance.ucla.edu>]  
**Sent:** Thursday, March 8, 2018 11:43 AM  
**To:** Carlson, Ann <[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)>; Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

That sounds good. We will call at 2pm on Monday – will we need to conference one of you in, or will you be together?

Thanks,  
Marisa

---

**From:** Carlson, Ann [<mailto:carlson@law.ucla.edu>]  
**Sent:** Thursday, March 08, 2018 11:39 AM  
**To:** Horowitz, Cara <[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)>; Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** Re: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

It also works for me and phone is fine for me (actually better).

Ann Carlson  
Shirley Shapiro Professor of Environmental Law  
Faculty Co-Director, Emmett Institute on Climate Change and the Environment  
UCLA School of Law  
(310) 206-9496

---

**From:** Horowitz, Cara  
**Sent:** Thursday, March 8, 2018 10:28:21 AM  
**To:** Hawkins, Marisa; Carlson, Ann  
**Cc:** Baldrige, Robert; Donmez, Ayse  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Yes for me, thanks. Should we do it by phone?

---

**From:** Hawkins, Marisa [<mailto:mhawkins@finance.ucla.edu>]  
**Sent:** Thursday, March 8, 2018 9:11 AM  
**To:** Carlson, Ann <[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)>; Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Dear Cara and Ann,

Would Monday at 2pm work for you both?

Thanks,  
Marisa

---

**From:** Carlson, Ann [<mailto:carlson@law.ucla.edu>]  
**Sent:** Wednesday, March 07, 2018 12:30 PM  
**To:** Horowitz, Cara <[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)>  
**Cc:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>; Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** Re: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Monday would work for me or Tuesday after 3. Thanks!

On Mar 7, 2018, at 12:21 PM, Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)> wrote:

Thank you, Marisa. Ann and I would like to discuss this request with counsel in your office. Would that be possible? Perhaps sometime early next week?

I am relatively free Monday afternoon (except from 3pm-3:30) and Tuesday afternoon after 1:30.

Thanks,  
Cara

Cara Horowitz  
Andrew Sabin Family Foundation Co-Executive Director  
Emmett Institute on Climate Change and the Environment

UCLA School of Law  
Ph (310) 206-4033  
[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)  
[www.law.ucla.edu/emmett](http://www.law.ucla.edu/emmett)

---

**From:** Hawkins, Marisa [<mailto:mhawkins@finance.ucla.edu>]  
**Sent:** Thursday, March 1, 2018 12:02 PM  
**To:** Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)>; Carlson, Ann <[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Dear Professor Horowitz and Professor Carlson,

My name is Marisa Hawkins and I am a staff member at UCLA Information Practices, working under Robert Baldrige. Mr. Baldrige recommended that I reach out to you because we recently received the attached request under the California Public Records Act (CPRA) from Christopher C. Horner, a Senior Fellow at the Competitive Enterprise Institute.

The request is somewhat involved, so I have summarized it below. Briefly, it is seeking:

1. **Emails to or from Professor Horowitz and/or Professor Carlson, dated March 1, 2016 through April 30, 2016, meeting any of the following criteria:**
  - a. **That are to or from Shaun Goho; or**
  - b. **That contain any of the following terms:**
    - i. **Harvard**
    - ii. **Pawa**
    - iii. **Frumhoff**
    - iv. **UCS**
    - v. **Eubanks**
    - vi. **CIEL**
2. **Emails to or from Professor Horowitz and/or Professor Carlson, dated December 1, 2017 through January 31, 2018, meeting any of the following criteria:**
  - a. **That relate to an event (date not specified by the requester) at UCLA, which followed up on an April 25, 2016 event at Harvard Law School; or**
  - b. **That contain any of the following terms:**

- i. **Frumhoff**
- ii. **McKibbon**
- iii. **Kimmell**
- iv. **Union of Concerned Scientists**
- v. **UCS**
- vi. **@ucsusa.org**

Would you be able to provide any responsive emails to any or all of the above requests?

Please know that the Office of Legal Affairs (OLA) is already aware of this request and that any responsive records provided will be thoroughly reviewed and vetted with the input of OLA and redacted and/or withheld where possible, pursuant to the legal exemptions to disclosure under CPRA.

For your reference, I have included our guidelines regarding the collection and forwarding of responsive emails. Please feel free to contact me if you have any questions or concerns.

Best regards,

**Marisa Hawkins**

Senior Public Records Analyst

UCLA Information Practices

(310) 206-4159

[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

**From:** [Hawkins, Marisa](#)  
**To:** [Carlson, Ann](#); [Horowitz, Cara](#)  
**Cc:** [Baldrige, Robert](#); [Donmez, Ayse](#)  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)  
**Date:** Thursday, March 08, 2018 6:13:13 PM

---

Great - if you will be off campus, please just let me know what number we should use to conference you in.

Thanks!  
Marisa

---

**From:** Carlson, Ann [mailto:[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)]  
**Sent:** Thursday, March 08, 2018 11:51 AM  
**To:** Horowitz, Cara <[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)>; Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** Re: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Not sure yet so conference line would be best. Thanks!

Ann Carlson  
Shirley Shapiro Professor of Environmental Law  
Faculty Co-Director, Emmett Institute on Climate Change and the Environment  
UCLA School of Law  
(310) 206-9496

---

**From:** Horowitz, Cara  
**Sent:** Thursday, March 8, 2018 11:46:31 AM  
**To:** Hawkins, Marisa; Carlson, Ann  
**Cc:** Baldrige, Robert; Donmez, Ayse  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Conference line is probably best (unless you'll be in the office and able to join me, Ann?). Thank you.

---

**From:** Hawkins, Marisa [mailto:[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)]  
**Sent:** Thursday, March 8, 2018 11:43 AM  
**To:** Carlson, Ann <[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)>; Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

That sounds good. We will call at 2pm on Monday – will we need to conference one of you in, or will you be together?

Thanks,  
Marisa

**From:** Carlson, Ann [<mailto:carlson@law.ucla.edu>]  
**Sent:** Thursday, March 08, 2018 11:39 AM  
**To:** Horowitz, Cara <[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)>; Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** Re: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

It also works for me and phone is fine for me (actually better).

Ann Carlson  
Shirley Shapiro Professor of Environmental Law  
Faculty Co-Director, Emmett Institute on Climate Change and the Environment  
UCLA School of Law  
(310) 206-9496

---

**From:** Horowitz, Cara  
**Sent:** Thursday, March 8, 2018 10:28:21 AM  
**To:** Hawkins, Marisa; Carlson, Ann  
**Cc:** Baldrige, Robert; Donmez, Ayse  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Yes for me, thanks. Should we do it by phone?

---

**From:** Hawkins, Marisa [<mailto:mhawkins@finance.ucla.edu>]  
**Sent:** Thursday, March 8, 2018 9:11 AM  
**To:** Carlson, Ann <[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)>; Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Dear Cara and Ann,

Would Monday at 2pm work for you both?

Thanks,  
Marisa

---

**From:** Carlson, Ann [<mailto:carlson@law.ucla.edu>]  
**Sent:** Wednesday, March 07, 2018 12:30 PM  
**To:** Horowitz, Cara <[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)>  
**Cc:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>; Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** Re: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Monday would work for me or Tuesday after 3. Thanks!

On Mar 7, 2018, at 12:21 PM, Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)> wrote:

Thank you, Marisa. Ann and I would like to discuss this request with counsel in your office. Would that be possible? Perhaps sometime early next week?

I am relatively free Monday afternoon (except from 3pm-3:30) and Tuesday afternoon after 1:30.

Thanks,  
Cara

Cara Horowitz  
Andrew Sabin Family Foundation Co-Executive Director  
Emmett Institute on Climate Change and the Environment  
UCLA School of Law  
Ph (310) 206-4033  
[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)  
[www.law.ucla.edu/emmett](http://www.law.ucla.edu/emmett)

---

**From:** Hawkins, Marisa [<mailto:mhawkins@finance.ucla.edu>]  
**Sent:** Thursday, March 1, 2016 12:02 PM  
**To:** Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)>; Carlson, Ann <[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Dear Professor Horowitz and Professor Carlson,

My name is Marisa Hawkins and I am a staff member at UCLA Information Practices, working under Robert Baldrige. Mr. Baldrige recommended that I reach out to you because we recently received the attached request under the California Public Records Act (CPRA) from Christopher C. Horner, a Senior Fellow at the Competitive Enterprise Institute.

The request is somewhat involved, so I have summarized it below. Briefly, it is seeking:

1. **Emails to or from Professor Horowitz and/or Professor Carlson, dated March 1, 2016 through April 30, 2016, meeting any of the following criteria:**
  - a. **That are to or from Shaun Goho; or**
  - b. **That contain any of the following terms:**

- i. **Harvard**
  - ii. **Pawa**
  - iii. **Frumhoff**
  - iv. **UCS**
  - v. **Eubanks**
  - vi. **CIEL**
2. **Emails to or from Professor Horowitz and/or Professor Carlson, dated December 1, 2017 through January 31, 2018, meeting any of the following criteria:**
- a. **That relate to an event (date not specified by the requester) at UCLA, which followed up on an April 25, 2016 event at Harvard Law School; or**
  - b. **That contain any of the following terms:**
    - i. **Frumhoff**
    - ii. **McKibbon**
    - iii. **Kimmell**
    - iv. **Union of Concerned Scientists**
    - v. **UCS**
    - vi. **@ucsusa.org**

Would you be able to provide any responsive emails to any or all of the above requests?

Please know that the Office of Legal Affairs (OLA) is already aware of this request and that any responsive records provided will be thoroughly reviewed and vetted with the input of OLA and redacted and/or withheld where possible, pursuant to the legal exemptions to disclosure under CPRA.

For your reference, I have included our guidelines regarding the collection and forwarding of responsive emails. Please feel free to contact me if you have any questions or concerns.

Best regards,

**Marisa Hawkins**  
Senior Public Records Analyst  
UCLA Information Practices  
(310) 206-4159  
[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

## Hawkins, Marisa

---

**From:** Horowitz, Cara <HOROWITZ@law.ucla.edu>  
**Sent:** Friday, March 09, 2018 9:14 AM  
**To:** Hawkins, Marisa  
**Subject:** Accepted: Call re PRA Request #18-5367

## Hawkins, Marisa

---

**From:** Carlson, Ann <carlson@law.ucla.edu>  
**Sent:** Friday, March 09, 2018 3:16 PM  
**To:** Hawkins, Marisa  
**Subject:** Accepted: Call re PRA Request #18-5367

**From:** [Carlson, Ann](#)  
**To:** [Hawkins, Marisa](#); [Horowitz, Cara](#)  
**Cc:** [Baldrige, Robert](#); [Donmez, Ayse](#)  
**Subject:** Re: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)  
**Date:** Monday, March 12, 2018 2:01:01 PM

---

I realize we may not have a conference line? I'm calling in from a cell phone. I can create the conference from my iPhone if you send me the numbers where I should call you

Ann Carlson  
Shirley Shapiro Professor of Environmental Law  
Faculty Co-Director, Emmett Institute on Climate Change and the Environment  
UCLA School of Law  
(310) 206-9496

---

**From:** Hawkins, Marisa <mhawkins@finance.ucla.edu>  
**Sent:** Thursday, March 8, 2018 6:13:14 PM  
**To:** Carlson, Ann; Horowitz, Cara  
**Cc:** Baldrige, Robert; Donmez, Ayse  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Great - if you will be off campus, please just let me know what number we should use to conference you in.

Thanks!  
Marisa

---

**From:** Carlson, Ann [mailto:carlson@law.ucla.edu]  
**Sent:** Thursday, March 08, 2018 11:51 AM  
**To:** Horowitz, Cara <horowitz@law.ucla.edu>; Hawkins, Marisa <mhawkins@finance.ucla.edu>  
**Cc:** Baldrige, Robert <rbaldrige@finance.ucla.edu>; Donmez, Ayse <adonmez@finance.ucla.edu>  
**Subject:** Re: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Not sure yet so conference line would be best. Thanks!

Ann Carlson  
Shirley Shapiro Professor of Environmental Law  
Faculty Co-Director, Emmett Institute on Climate Change and the Environment  
UCLA School of Law  
(310) 206-9496

---

**From:** Horowitz, Cara  
**Sent:** Thursday, March 8, 2018 11:46:31 AM  
**To:** Hawkins, Marisa; Carlson, Ann  
**Cc:** Baldrige, Robert; Donmez, Ayse  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Conference line is probably best (unless you'll be in the office and able to join me, Ann?). Thank you.

---

**From:** Hawkins, Marisa [<mailto:mhawkins@finance.ucla.edu>]  
**Sent:** Thursday, March 8, 2018 11:43 AM  
**To:** Carlson, Ann <[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)>; Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

That sounds good. We will call at 2pm on Monday – will we need to conference one of you in, or will you be together?

Thanks,  
Marisa

---

**From:** Carlson, Ann [<mailto:carlson@law.ucla.edu>]  
**Sent:** Thursday, March 08, 2018 11:39 AM  
**To:** Horowitz, Cara <[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)>; Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** Re: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

It also works for me and phone is fine for me (actually better).

Ann Carlson  
Shirley Shapiro Professor of Environmental Law  
Faculty Co-Director, Emmett Institute on Climate Change and the Environment  
UCLA School of Law  
(310) 206-9496

---

**From:** Horowitz, Cara  
**Sent:** Thursday, March 8, 2018 10:28:21 AM  
**To:** Hawkins, Marisa; Carlson, Ann  
**Cc:** Baldrige, Robert; Donmez, Ayse  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Yes for me, thanks. Should we do it by phone?

---

**From:** Hawkins, Marisa [<mailto:mhawkins@finance.ucla.edu>]  
**Sent:** Thursday, March 8, 2018 9:11 AM  
**To:** Carlson, Ann <[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)>; Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Dear Cara and Ann,

Would Monday at 2pm work for you both?

Thanks,

Marisa

---

**From:** Carlson, Ann [<mailto:carlson@law.ucla.edu>]  
**Sent:** Wednesday, March 07, 2018 12:30 PM  
**To:** Horowitz, Cara <[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)>  
**Cc:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>; Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** Re: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Monday would work for me or Tuesday after 3. Thanks!

On Mar 7, 2018, at 12:21 PM, Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)> wrote:

Thank you, Marisa. Ann and I would like to discuss this request with counsel in your office. Would that be possible? Perhaps sometime early next week?

I am relatively free Monday afternoon (except from 3pm-3:30) and Tuesday afternoon after 1:30.

Thanks,  
Cara

Cara Horowitz  
Andrew Sabin Family Foundation Co-Executive Director  
Emmett Institute on Climate Change and the Environment  
UCLA School of Law  
Ph (310) 206-4033  
[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)  
[www.law.ucla.edu/emmett](http://www.law.ucla.edu/emmett)

---

**From:** Hawkins, Marisa [<mailto:mhawkins@finance.ucla.edu>]  
**Sent:** Thursday, March 1, 2018 12:02 PM  
**To:** Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)>; Carlson, Ann <[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Dear Professor Horowitz and Professor Carlson,

My name is Marisa Hawkins and I am a staff member at UCLA Information Practices, working under Robert Baldrige. Mr. Baldrige recommended that I reach out to you because we recently received the attached request under the California Public Records Act (CPRA) from Christopher C. Horner, a Senior Fellow at the Competitive Enterprise Institute.

The request is somewhat involved, so I have summarized it below. Briefly, it is seeking:

1. **Emails to or from Professor Horowitz and/or Professor Carlson, dated March 1, 2016 through April 30, 2016, meeting any of the following criteria:**
  - a. **That are to or from Shaun Goho; or**
  - b. **That contain any of the following terms:**
    - i. **Harvard**
    - ii. **Pawa**
    - iii. **Frumhoff**
    - iv. **UCS**
    - v. **Eubanks**
    - vi. **CIEL**
2. **Emails to or from Professor Horowitz and/or Professor Carlson, dated December 1, 2017 through January 31, 2018, meeting any of the following criteria:**
  - a. **That relate to an event (date not specified by the requester) at UCLA, which followed up on an April 25, 2016 event at Harvard Law School; or**
  - b. **That contain any of the following terms:**
    - i. **Frumhoff**
    - ii. **McKibbon**
    - iii. **Kimmell**
    - iv. **Union of Concerned Scientists**
    - v. **UCS**
    - vi. **@ucsusa.org**

Would you be able to provide any responsive emails to any or all of the above requests?

Please know that the Office of Legal Affairs (OLA) is already aware of this request and that any responsive records provided will be thoroughly reviewed and vetted with the input of OLA and redacted and/or withheld where possible, pursuant to the legal exemptions to disclosure under CPRA.

For your reference, I have included our guidelines regarding the collection and forwarding of responsive emails. Please feel free to contact me if you have any questions or concerns.

Best regards,

**Marisa Hawkins**

Senior Public Records Analyst

UCLA Information Practices

(310) 206-4159

[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

**From:** [Horowitz, Cara](#)  
**To:** [Carlson, Ann E.](#); [Hawkins, Marisa](#)  
**Cc:** [Baldrige, Robert](#); [Donmez, Ayse](#)  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)  
**Date:** Monday, March 12, 2018 2:02:41 PM

---

We are calling you now...

---

**From:** Carlson, Ann  
**Sent:** Monday, March 12, 2018 2:01 PM  
**To:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>; Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** Re: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

I realize we may not have a conference line? I'm calling in from a cell phone. I can create the conference from my iPhone if you send me the numbers where I should call you

Ann Carlson  
Shirley Shapiro Professor of Environmental Law  
Faculty Co-Director, Emmett Institute on Climate Change and the Environment  
UCLA School of Law  
(310) 206-9496

---

**From:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>  
**Sent:** Thursday, March 8, 2018 6:13:14 PM  
**To:** Carlson, Ann; Horowitz, Cara  
**Cc:** Baldrige, Robert; Donmez, Ayse  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Great - if you will be off campus, please just let me know what number we should use to conference you in.

Thanks!  
Marisa

---

**From:** Carlson, Ann [<mailto:carlson@law.ucla.edu>]  
**Sent:** Thursday, March 08, 2018 11:51 AM  
**To:** Horowitz, Cara <[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)>; Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** Re: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Not sure yet so conference line would be best. Thanks!

Ann Carlson  
Shirley Shapiro Professor of Environmental Law  
Faculty Co-Director, Emmett Institute on Climate Change and the Environment  
UCLA School of Law

(310) 206-9496

---

**From:** Horowitz, Cara  
**Sent:** Thursday, March 8, 2018 11:46:31 AM  
**To:** Hawkins, Marisa; Carlson, Ann  
**Cc:** Baldrige, Robert; Donmez, Ayse  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Conference line is probably best (unless you'll be in the office and able to join me, Ann?). Thank you.

---

**From:** Hawkins, Marisa [<mailto:mhawkins@finance.ucla.edu>]  
**Sent:** Thursday, March 8, 2018 11:43 AM  
**To:** Carlson, Ann <[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)>; Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

That sounds good. We will call at 2pm on Monday – will we need to conference one of you in, or will you be together?

Thanks,  
Marisa

---

**From:** Carlson, Ann [<mailto:carlson@law.ucla.edu>]  
**Sent:** Thursday, March 08, 2018 11:39 AM  
**To:** Horowitz, Cara <[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)>; Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** Re: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

It also works for me and phone is fine for me (actually better).

Ann Carlson  
Shirley Shapiro Professor of Environmental Law  
Faculty Co-Director, Emmett Institute on Climate Change and the Environment  
UCLA School of Law  
(310) 206-9496

---

**From:** Horowitz, Cara  
**Sent:** Thursday, March 8, 2018 10:28:21 AM  
**To:** Hawkins, Marisa; Carlson, Ann  
**Cc:** Baldrige, Robert; Donmez, Ayse  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Yes for me, thanks. Should we do it by phone?

---

**From:** Hawkins, Marisa [<mailto:mhawkins@finance.ucla.edu>]

**Sent:** Thursday, March 8, 2018 9:11 AM

**To:** Carlson, Ann <[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)>; Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)>

**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>

**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Dear Cara and Ann,

Would Monday at 2pm work for you both?

Thanks,  
Marisa

---

**From:** Carlson, Ann [<mailto:carlson@law.ucla.edu>]

**Sent:** Wednesday, March 07, 2018 12:30 PM

**To:** Horowitz, Cara <[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)>

**Cc:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>; Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>

**Subject:** Re: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Monday would work for me or Tuesday after 3. Thanks!

On Mar 7, 2018, at 12:21 PM, Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)> wrote:

Thank you, Marisa. Ann and I would like to discuss this request with counsel in your office. Would that be possible? Perhaps sometime early next week?

I am relatively free Monday afternoon (except from 3pm-3:30) and Tuesday afternoon after 1:30.

Thanks,  
Cara

Cara Horowitz  
Andrew Sabin Family Foundation Co-Executive Director  
Emmett Institute on Climate Change and the Environment  
UCLA School of Law  
Ph (310) 206-4033  
[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)  
[www.law.ucla.edu/emmett](http://www.law.ucla.edu/emmett)

**From:** Hawkins, Marisa [<mailto:mhawkins@finance.ucla.edu>]  
**Sent:** Thursday, March 1, 2018 12:02 PM  
**To:** Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)>; Carlson, Ann <[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Dear Professor Horowitz and Professor Carlson,

My name is Marisa Hawkins and I am a staff member at UCLA Information Practices, working under Robert Baldrige. Mr. Baldrige recommended that I reach out to you because we recently received the attached request under the California Public Records Act (CPRA) from Christopher C. Horner, a Senior Fellow at the Competitive Enterprise Institute.

The request is somewhat involved, so I have summarized it below. Briefly, it is seeking:

1. **Emails to or from Professor Horowitz and/or Professor Carlson, dated March 1, 2016 through April 30, 2016, meeting any of the following criteria:**
  - a. **That are to or from Shaun Goho; or**
  - b. **That contain any of the following terms:**
    - i. **Harvard**
    - ii. **Pawa**
    - iii. **Frumhoff**
    - iv. **UCS**
    - v. **Eubanks**
    - vi. **CIEL**
2. **Emails to or from Professor Horowitz and/or Professor Carlson, dated December 1, 2017 through January 31, 2018, meeting any of the following criteria:**
  - a. **That relate to an event (date not specified by the requester) at UCLA, which followed up on an April 25, 2016 event at Harvard Law School; or**
  - b. **That contain any of the following terms:**
    - i. **Frumhoff**
    - ii. **McKibbon**
    - iii. **Kimmell**
    - iv. **Union of Concerned Scientists**
    - v. **UCS**
    - vi. **@ucsusa.org**

Would you be able to provide any responsive emails to any or all of the above requests?

Please know that the Office of Legal Affairs (OLA) is already aware of this request and that any responsive records provided will be thoroughly reviewed and vetted with the input of OLA and redacted and/or withheld where possible, pursuant to the legal exemptions to disclosure under CPRA.

For your reference, I have included our guidelines regarding the collection and forwarding of responsive emails. Please feel free to contact me if you have any questions or concerns.

Best regards,

**Marisa Hawkins**

Senior Public Records Analyst

UCLA Information Practices

(310) 206-4159

[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

**From:** [Carlson, Ann](#)  
**To:** [Hawkins, Marisa](#); [Horowitz, Cara](#)  
**Cc:** [Baldrige, Robert](#); [Donmez, Ayse](#)  
**Subject:** Re: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)  
**Date:** Friday, March 16, 2018 3:23:30 PM

---

What is the timing for responding?

Thanks for getting the clarification.

Ann Carlson  
Shirley Shapiro Professor of Environmental Law  
Faculty Co-Director, Emmett Institute on Climate Change and the Environment  
UCLA School of Law  
(310) 206-9496

---

**From:** Hawkins, Marisa <mhawkins@finance.ucla.edu>  
**Sent:** Friday, March 16, 2018 3:06:14 PM  
**To:** Horowitz, Cara; Carlson, Ann  
**Cc:** Baldrige, Robert; Donmez, Ayse  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Dear Cara and Ann,

Mr. Horner has responded to our request for clarification; I have attached his response for your reference.

With respect to the search term "Harvard" in Part I of his request, he has clarified that he is seeking **correspondence that both contains the term Harvard and relates to the April 25, 2016 briefing at Harvard.**

With respect to the UCLA event he speaks about in Part II of his request, he has clarified that he is referring to the following event: <https://law.ucla.edu/news-and-events/4065/2018/1/25/Holding-Fossil-Fuel-Companies-Liable-for-Climate-Change-Harms-in-California-c-Law-Science-and-Justice/>

Please don't hesitate to get in touch if you have any questions about his response, or about how to gather the documents for this matter.

Thank you once again for your help with this,  
Marisa

**Marisa Hawkins**  
Senior Public Records Analyst  
UCLA Information Practices  
(310) 206-4159  
[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

---

**From:** Hawkins, Marisa

**Sent:** Tuesday, March 13, 2018 10:46 AM

**To:** Horowitz, Cara <HOROWITZ@law.ucla.edu>; Carlson, Ann E. <carlson@law.ucla.edu>

**Cc:** Baldrige, Robert <rbaldrige@finance.ucla.edu>; Donmez, Ayse <adonmez@finance.ucla.edu>

**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Dear Cara and Ann,

Thank you for taking the time to talk yesterday, and for alerting us to the issues that require further clarification from the requester. We have sent a clarification letter to Mr. Horner, incorporating your language below. I will let you know as soon as we hear back from him. In the meantime, it would be very helpful if you could gather any responsive documents that are not affected by the clarification request, so that our office can begin the process of review.

Thanks once again for your help on this matter.

Best,  
Marisa

**Marisa Hawkins**

Senior Public Records Analyst

UCLA Information Practices

(310) 206-4159

[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

---

**From:** Horowitz, Cara [<mailto:HOROWITZ@law.ucla.edu>]

**Sent:** Monday, March 12, 2018 2:47 PM

**To:** Carlson, Ann E. <[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)>; Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>

**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>

**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Thanks for the call today. As promised, here's information on seeking clarification as to Part II of the request:

-Part II of the request states that "UCLA held a follow-up event [to the April 2016 Harvard Law School workshop], moderated by Ms. Horowitz with the participation of Prof. Carlson", and asks for correspondence relating to this UCLA event that meets certain criteria. UCLA did not hold a follow-up event to the April 2016 Harvard Law School workshop. Does the requester intend to reference a public discussion of recently filed litigation by local governments against fossil fuel companies for climate change harms, held at UCLA's Fowler Museum on January 25, 2018? That event was moderated by Ms. Horowitz, and Professor Carlson participated.

And here's a stab at asking for clarification on the Harvard emails point – Ann can weigh in here if she has other suggestions:

-Part I of the request asks for all correspondence sent, received, or possessed by Cara Horowitz or Ann Carlson dated from March 1, 2016 to April 30, 2016, which includes the term "Harvard." Both

faculty members receive an extraordinary number of emails that contain the term “Harvard,” including through academic email listservs and from other sources. Most of these emails have no relationship whatsoever to the April 2016 briefing at Harvard referenced in the request, or to litigation or potential litigation against fossil fuel companies for climate change harms. UCLA seeks clarification that it may exclude from its response emails that contain the word “Harvard” but that are not related to the April 2016 briefing at Harvard referenced in the request, or to litigation or potential litigation against fossil fuel companies for climate change harms.

Thanks,  
Cara

---

**From:** Carlson, Ann  
**Sent:** Monday, March 12, 2018 2:01 PM  
**To:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>; Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** Re: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

I realize we may not have a conference line? I'm calling in from a cell phone. I can create the conference from my iPhone if you send me the numbers where I should call you

Ann Carlson  
Shirley Shapiro Professor of Environmental Law  
Faculty Co-Director, Emmett Institute on Climate Change and the Environment  
UCLA School of Law  
(310) 206-9496

---

**From:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>  
**Sent:** Thursday, March 8, 2018 6:13:14 PM  
**To:** Carlson, Ann; Horowitz, Cara  
**Cc:** Baldrige, Robert; Donmez, Ayse  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Great - if you will be off campus, please just let me know what number we should use to conference you in.

Thanks!  
Marisa

---

**From:** Carlson, Ann [<mailto:carlson@law.ucla.edu>]  
**Sent:** Thursday, March 08, 2018 11:51 AM  
**To:** Horowitz, Cara <[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)>; Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** Re: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Not sure yet so conference line would be best. Thanks!

Ann Carlson  
Shirley Shapiro Professor of Environmental Law  
Faculty Co-Director, Emmett Institute on Climate Change and the Environment  
UCLA School of Law  
(310) 206-9496

---

**From:** Horowitz, Cara  
**Sent:** Thursday, March 8, 2018 11:46:31 AM  
**To:** Hawkins, Marisa; Carlson, Ann  
**Cc:** Baldrige, Robert; Donmez, Ayse  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Conference line is probably best (unless you'll be in the office and able to join me, Ann?). Thank you.

---

**From:** Hawkins, Marisa [<mailto:mhawkins@finance.ucla.edu>]  
**Sent:** Thursday, March 8, 2018 11:43 AM  
**To:** Carlson, Ann <[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)>; Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

That sounds good. We will call at 2pm on Monday – will we need to conference one of you in, or will you be together?

Thanks,  
Marisa

---

**From:** Carlson, Ann [<mailto:carlson@law.ucla.edu>]  
**Sent:** Thursday, March 08, 2018 11:39 AM  
**To:** Horowitz, Cara <[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)>; Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** Re: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

It also works for me and phone is fine for me (actually better).

Ann Carlson  
Shirley Shapiro Professor of Environmental Law  
Faculty Co-Director, Emmett Institute on Climate Change and the Environment  
UCLA School of Law  
(310) 206-9496

---

**From:** Horowitz, Cara  
**Sent:** Thursday, March 8, 2018 10:28:21 AM  
**To:** Hawkins, Marisa; Carlson, Ann  
**Cc:** Baldrige, Robert; Donmez, Ayse  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Yes for me, thanks. Should we do it by phone?

---

**From:** Hawkins, Marisa [<mailto:mhawkins@finance.ucla.edu>]  
**Sent:** Thursday, March 8, 2018 9:11 AM  
**To:** Carlson, Ann <[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)>; Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Dear Cara and Ann,

Would Monday at 2pm work for you both?

Thanks,  
Marisa

---

**From:** Carlson, Ann [<mailto:carlson@law.ucla.edu>]  
**Sent:** Wednesday, March 07, 2018 12:30 PM  
**To:** Horowitz, Cara <[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)>  
**Cc:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>; Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** Re: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Monday would work for me or Tuesday after 3. Thanks!

On Mar 7, 2018, at 12:21 PM, Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)> wrote:

Thank you, Marisa. Ann and I would like to discuss this request with counsel in your office. Would that be possible? Perhaps sometime early next week?

I am relatively free Monday afternoon (except from 3pm-3:30) and Tuesday afternoon after 1:30.

Thanks,  
Cara

Cara Horowitz  
Andrew Sabin Family Foundation Co-Executive Director  
Emmett Institute on Climate Change and the Environment  
UCLA School of Law  
Ph (310) 206-4033  
[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)  
[www.law.ucla.edu/emmett](http://www.law.ucla.edu/emmett)

---

**From:** Hawkins, Marisa [<mailto:mhawkins@finance.ucla.edu>]  
**Sent:** Thursday, March 1, 2018 12:02 PM  
**To:** Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)>; Carlson, Ann <[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Dear Professor Horowitz and Professor Carlson,

My name is Marisa Hawkins and I am a staff member at UCLA Information Practices, working under Robert Baldrige. Mr. Baldrige recommended that I reach out to you because we recently received the attached request under the California Public Records Act (CPRA) from Christopher C. Horner, a Senior Fellow at the Competitive Enterprise Institute.

The request is somewhat involved, so I have summarized it below. Briefly, it is seeking:

1. **Emails to or from Professor Horowitz and/or Professor Carlson, dated March 1, 2016 through April 30, 2016, meeting any of the following criteria:**
  - a. **That are to or from Shaun Goho; or**
  - b. **That contain any of the following terms:**
    - i. **Harvard**
    - ii. **Pawa**
    - iii. **Frumhoff**
    - iv. **UCS**
    - v. **Eubanks**
    - vi. **CIEL**
2. **Emails to or from Professor Horowitz and/or Professor Carlson, dated December 1, 2017 through January 31, 2018, meeting any of the following criteria:**
  - a. **That relate to an event (date not specified by the requester) at UCLA, which followed up on an April 25, 2016 event at Harvard Law School; or**
  - b. **That contain any of the following terms:**
    - i. **Frumhoff**
    - ii. **McKibbon**
    - iii. **Kimmell**
    - iv. **Union of Concerned Scientists**
    - v. **UCS**
    - vi. **@ucsusa.org**

Would you be able to provide any responsive emails to any or all of the above requests?

Please know that the Office of Legal Affairs (OLA) is already aware of this request and that any responsive records provided will be thoroughly reviewed and vetted with the input of OLA and redacted and/or withheld where possible, pursuant to the legal exemptions to disclosure under CPRA.

For your reference, I have included our guidelines regarding the collection and forwarding of responsive emails. Please feel free to contact me if you have any questions or concerns.

Best regards,

**Marisa Hawkins**

Senior Public Records Analyst

UCLA Information Practices

(310) 206-4159

[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

**From:** [Hawkins, Marisa](#)  
**To:** [Carlson, Ann](#); [Horowitz, Cara](#)  
**Cc:** [Baldridge, Robert](#); [Donmez, Ayse](#)  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)  
**Date:** Friday, March 16, 2018 3:42:17 PM

---

Dear Ann,

In order to review the documents and get them to the requester by our due date, it would be ideal to have responsive records within the next week to ten days. Let me know if that is feasible for you, and we can work around your schedule.

Thanks,  
Marisa

---

**From:** Carlson, Ann [mailto:[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)]  
**Sent:** Friday, March 16, 2018 3:23 PM  
**To:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>; Horowitz, Cara <[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)>  
**Cc:** Baldridge, Robert <[rbaldridge@finance.ucla.edu](mailto:rbaldridge@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** Re: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

What is the timing for responding?

Thanks for getting the clarification.

Ann Carlson  
Shirley Shapiro Professor of Environmental Law  
Faculty Co-Director, Emmett Institute on Climate Change and the Environment  
UCLA School of Law  
(310) 206-9496

---

**From:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>  
**Sent:** Friday, March 16, 2018 3:06:14 PM  
**To:** Horowitz, Cara; Carlson, Ann  
**Cc:** Baldridge, Robert; Donmez, Ayse  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Dear Cara and Ann,

Mr. Horner has responded to our request for clarification; I have attached his response for your reference.

With respect to the search term "Harvard" in Part I of his request, he has clarified that he is seeking **correspondence that both contains the term Harvard and relates to the April 25, 2016 briefing at Harvard.**

With respect to the UCLA event he speaks about in Part II of his request, he has clarified that he is referring to the following event: <https://law.ucla.edu/news-and-events/4065/2018/1/25/Holding-Fossil-Fuel-Companies-Liable-for-Climate-Change-Harms-in-California-c-Law-Science-and-Justice/>

Please don't hesitate to get in touch if you have any questions about his response, or about how to gather the documents for this matter.

Thank you once again for your help with this,  
Marisa

**Marisa Hawkins**

Senior Public Records Analyst  
UCLA Information Practices  
(310) 206-4159  
[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

---

**From:** Hawkins, Marisa  
**Sent:** Tuesday, March 13, 2018 10:46 AM  
**To:** Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)>; Carlson, Ann E. <[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Dear Cara and Ann,

Thank you for taking the time to talk yesterday, and for alerting us to the issues that require further clarification from the requester. We have sent a clarification letter to Mr. Horner, incorporating your language below. I will let you know as soon as we hear back from him. In the meantime, it would be very helpful if you could gather any responsive documents that are not affected by the clarification request, so that our office can begin the process of review.

Thanks once again for your help on this matter.

Best,  
Marisa

**Marisa Hawkins**

Senior Public Records Analyst  
UCLA Information Practices  
(310) 206-4159  
[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

---

**From:** Horowitz, Cara [<mailto:HOROWITZ@law.ucla.edu>]  
**Sent:** Monday, March 12, 2018 2:47 PM  
**To:** Carlson, Ann E. <[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)>; Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>

**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Thanks for the call today. As promised, here's information on seeking clarification as to Part II of the request:

-Part II of the request states that "UCLA held a follow-up event [to the April 2016 Harvard Law School workshop], moderated by Ms. Horowitz with the participation of Prof. Carlson", and asks for correspondence relating to this UCLA event that meets certain criteria. UCLA did not hold a follow-up event to the April 2016 Harvard Law School workshop. Does the requester intend to reference a public discussion of recently filed litigation by local governments against fossil fuel companies for climate change harms, held at UCLA's Fowler Museum on January 25, 2018? That event was moderated by Ms. Horowitz, and Professor Carlson participated.

And here's a stab at asking for clarification on the Harvard emails point – Ann can weigh in here if she has other suggestions:

-Part I of the request asks for all correspondence sent, received, or possessed by Cara Horowitz or Ann Carlson dated from March 1, 2016 to April 30, 2016, which includes the term "Harvard." Both faculty members receive an extraordinary number of emails that contain the term "Harvard," including through academic email listservs and from other sources. Most of these emails have no relationship whatsoever to the April 2016 briefing at Harvard referenced in the request, or to litigation or potential litigation against fossil fuel companies for climate change harms. UCLA seeks clarification that it may exclude from its response emails that contain the word "Harvard" but that are not related to the April 2016 briefing at Harvard referenced in the request, or to litigation or potential litigation against fossil fuel companies for climate change harms.

Thanks,  
Cara

---

**From:** Carlson, Ann  
**Sent:** Monday, March 12, 2018 2:01 PM  
**To:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>; Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** Re: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

I realize we may not have a conference line? I'm calling in from a cell phone. I can create the conference from my iPhone if you send me the numbers where I should call you

Ann Carlson  
Shirley Shapiro Professor of Environmental Law  
Faculty Co-Director, Emmett Institute on Climate Change and the Environment  
UCLA School of Law  
(310) 206-9496

---

**From:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>

**Sent:** Thursday, March 8, 2018 6:13:14 PM

**To:** Carlson, Ann; Horowitz, Cara

**Cc:** Baldridge, Robert; Donmez, Ayse

**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Great - if you will be off campus, please just let me know what number we should use to conference you in.

Thanks!

Marisa

---

**From:** Carlson, Ann [<mailto:carlson@law.ucla.edu>]

**Sent:** Thursday, March 08, 2018 11:51 AM

**To:** Horowitz, Cara <[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)>; Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>

**Cc:** Baldridge, Robert <[rbaldridge@finance.ucla.edu](mailto:rbaldridge@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>

**Subject:** Re: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Not sure yet so conference line would be best. Thanks!

Ann Carlson

Shirley Shapiro Professor of Environmental Law

Faculty Co-Director, Emmett Institute on Climate Change and the Environment

UCLA School of Law

(310) 206-9496

---

**From:** Horowitz, Cara

**Sent:** Thursday, March 8, 2018 11:46:31 AM

**To:** Hawkins, Marisa; Carlson, Ann

**Cc:** Baldridge, Robert; Donmez, Ayse

**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Conference line is probably best (unless you'll be in the office and able to join me, Ann?). Thank you.

---

**From:** Hawkins, Marisa [<mailto:mhawkins@finance.ucla.edu>]

**Sent:** Thursday, March 8, 2018 11:43 AM

**To:** Carlson, Ann <[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)>; Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)>

**Cc:** Baldridge, Robert <[rbaldridge@finance.ucla.edu](mailto:rbaldridge@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>

**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

That sounds good. We will call at 2pm on Monday – will we need to conference one of you in, or will you be together?

Thanks,

Marisa

**From:** Carlson, Ann [<mailto:carlson@law.ucla.edu>]  
**Sent:** Thursday, March 08, 2018 11:39 AM  
**To:** Horowitz, Cara <[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)>; Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** Re: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

It also works for me and phone is fine for me (actually better).

Ann Carlson  
Shirley Shapiro Professor of Environmental Law  
Faculty Co-Director, Emmett Institute on Climate Change and the Environment  
UCLA School of Law  
(310) 206-9496

---

**From:** Horowitz, Cara  
**Sent:** Thursday, March 8, 2018 10:28:21 AM  
**To:** Hawkins, Marisa; Carlson, Ann  
**Cc:** Baldrige, Robert; Donmez, Ayse  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Yes for me, thanks. Should we do it by phone?

---

**From:** Hawkins, Marisa [<mailto:mhawkins@finance.ucla.edu>]  
**Sent:** Thursday, March 8, 2018 9:11 AM  
**To:** Carlson, Ann <[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)>; Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Dear Cara and Ann,

Would Monday at 2pm work for you both?

Thanks,  
Marisa

---

**From:** Carlson, Ann [<mailto:carlson@law.ucla.edu>]  
**Sent:** Wednesday, March 07, 2018 12:30 PM  
**To:** Horowitz, Cara <[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)>  
**Cc:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>; Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** Re: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Monday would work for me or Tuesday after 3. Thanks!

On Mar 7, 2018, at 12:21 PM, Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)> wrote:

Thank you, Marisa. Ann and I would like to discuss this request with counsel in your office. Would that be possible? Perhaps sometime early next week?

I am relatively free Monday afternoon (except from 3pm-3:30) and Tuesday afternoon after 1:30.

Thanks,  
Cara

Cara Horowitz  
Andrew Sabin Family Foundation Co-Executive Director  
Emmett Institute on Climate Change and the Environment  
UCLA School of Law  
Ph (310) 206-4033  
[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)  
[www.law.ucla.edu/emmett](http://www.law.ucla.edu/emmett)

---

**From:** Hawkins, Marisa [<mailto:mhawkins@finance.ucla.edu>]  
**Sent:** Thursday, March 1, 2016 12:02 PM  
**To:** Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)>; Carlson, Ann <[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Dear Professor Horowitz and Professor Carlson,

My name is Marisa Hawkins and I am a staff member at UCLA Information Practices, working under Robert Baldrige. Mr. Baldrige recommended that I reach out to you because we recently received the attached request under the California Public Records Act (CPRA) from Christopher C. Horner, a Senior Fellow at the Competitive Enterprise Institute.

The request is somewhat involved, so I have summarized it below. Briefly, it is seeking:

1. **Emails to or from Professor Horowitz and/or Professor Carlson, dated March 1, 2016 through April 30, 2016, meeting any of the following criteria:**
  - a. **That are to or from Shaun Goho; or**
  - b. **That contain any of the following terms:**

- i. **Harvard**
  - ii. **Pawa**
  - iii. **Frumhoff**
  - iv. **UCS**
  - v. **Eubanks**
  - vi. **CIEL**
2. **Emails to or from Professor Horowitz and/or Professor Carlson, dated December 1, 2017 through January 31, 2018, meeting any of the following criteria:**
- a. **That relate to an event (date not specified by the requester) at UCLA, which followed up on an April 25, 2016 event at Harvard Law School; or**
  - b. **That contain any of the following terms:**
    - i. **Frumhoff**
    - ii. **McKibbon**
    - iii. **Kimmell**
    - iv. **Union of Concerned Scientists**
    - v. **UCS**
    - vi. **@ucsusa.org**

Would you be able to provide any responsive emails to any or all of the above requests?

Please know that the Office of Legal Affairs (OLA) is already aware of this request and that any responsive records provided will be thoroughly reviewed and vetted with the input of OLA and redacted and/or withheld where possible, pursuant to the legal exemptions to disclosure under CPRA.

For your reference, I have included our guidelines regarding the collection and forwarding of responsive emails. Please feel free to contact me if you have any questions or concerns.

Best regards,

**Marisa Hawkins**  
Senior Public Records Analyst  
UCLA Information Practices  
(310) 206-4159  
[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

**From:** [Hawkins, Marisa](#)  
**To:** [Carlson, Ann E.](#); [Horowitz, Cara](#)  
**Cc:** [Baldridge, Robert](#); [Donmez, Ayse](#)  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)  
**Date:** Monday, March 26, 2018 6:41:58 PM  
**Attachments:** [Request \(18-5367\).pdf](#)  
[CEI UCLA Harvard Meeting request Followup.pdf](#)  
[Emails - Guidelines re Collection for Production.pdf](#)

---

Dear Ann and Cara,

I am following up to see if you have had the chance to locate any records responsive to the attached request and clarification. I have also attached our guidelines regarding the collection and forwarding of responsive emails. Do you have an idea of how many records there may be, or what your timeframe might be for gathering them?

Please feel free to contact me if you have any questions or concerns, and thanks for your help with this matter.

Best,  
Marisa

**Marisa Hawkins**

Senior Public Records Analyst  
UCLA Information Practices  
(310) 206-4159  
[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

---

**From:** Hawkins, Marisa  
**Sent:** Friday, March 16, 2018 3:42 PM  
**To:** Carlson, Ann <[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)>; Horowitz, Cara <[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)>  
**Cc:** Baldridge, Robert <[rbaldridge@finance.ucla.edu](mailto:rbaldridge@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Dear Ann,

In order to review the documents and get them to the requester by our due date, it would be ideal to have responsive records within the next week to ten days. Let me know if that is feasible for you, and we can work around your schedule.

Thanks,  
Marisa

---

**From:** Carlson, Ann [<mailto:carlson@law.ucla.edu>]  
**Sent:** Friday, March 16, 2018 3:23 PM  
**To:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>; Horowitz, Cara <[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)>  
**Cc:** Baldridge, Robert <[rbaldridge@finance.ucla.edu](mailto:rbaldridge@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>

**Subject:** Re: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

What is the timing for responding?

Thanks for getting the clarification.

Ann Carlson  
Shirley Shapiro Professor of Environmental Law  
Faculty Co-Director, Emmett Institute on Climate Change and the Environment  
UCLA School of Law  
(310) 206-9496

---

**From:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>  
**Sent:** Friday, March 16, 2018 3:06:14 PM  
**To:** Horowitz, Cara; Carlson, Ann  
**Cc:** Baldrige, Robert; Donmez, Ayse  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Dear Cara and Ann,

Mr. Horner has responded to our request for clarification; I have attached his response for your reference.

With respect to the search term "Harvard" in Part I of his request, he has clarified that he is seeking **correspondence that both contains the term Harvard and relates to the April 25, 2016 briefing at Harvard.**

With respect to the UCLA event he speaks about in Part II of his request, he has clarified that he is referring to the following event: <https://law.ucla.edu/news-and-events/4065/2018/1/25/Holding-Fossil-Fuel-Companies-Liable-for-Climate-Change-Harms-in-California-c-Law-Science-and-Justice/>

Please don't hesitate to get in touch if you have any questions about his response, or about how to gather the documents for this matter.

Thank you once again for your help with this,  
Marisa

**Marisa Hawkins**  
Senior Public Records Analyst  
UCLA Information Practices  
(310) 206-4159  
[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

---

**From:** Hawkins, Marisa  
**Sent:** Tuesday, March 13, 2018 10:46 AM

**To:** Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)>; Carlson, Ann E. <[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)>  
**Cc:** Baldridge, Robert <[rbaldridge@finance.ucla.edu](mailto:rbaldridge@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Dear Cara and Ann,

Thank you for taking the time to talk yesterday, and for alerting us to the issues that require further clarification from the requester. We have sent a clarification letter to Mr. Horner, incorporating your language below. I will let you know as soon as we hear back from him. In the meantime, it would be very helpful if you could gather any responsive documents that are not affected by the clarification request, so that our office can begin the process of review.

Thanks once again for your help on this matter.

Best,  
Marisa

**Marisa Hawkins**

Senior Public Records Analyst  
UCLA Information Practices  
(310) 206-4159  
[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

---

**From:** Horowitz, Cara [<mailto:HOROWITZ@law.ucla.edu>]  
**Sent:** Monday, March 12, 2018 2:47 PM  
**To:** Carlson, Ann E. <[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)>; Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>  
**Cc:** Baldridge, Robert <[rbaldridge@finance.ucla.edu](mailto:rbaldridge@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Thanks for the call today. As promised, here's information on seeking clarification as to Part II of the request:

-Part II of the request states that "UCLA held a follow-up event [to the April 2016 Harvard Law School workshop], moderated by Ms. Horowitz with the participation of Prof. Carlson", and asks for correspondence relating to this UCLA event that meets certain criteria. UCLA did not hold a follow-up event to the April 2016 Harvard Law School workshop. Does the requester intend to reference a public discussion of recently filed litigation by local governments against fossil fuel companies for climate change harms, held at UCLA's Fowler Museum on January 25, 2018? That event was moderated by Ms. Horowitz, and Professor Carlson participated.

And here's a stab at asking for clarification on the Harvard emails point – Ann can weigh in here if she has other suggestions:

-Part I of the request asks for all correspondence sent, received, or possessed by Cara Horowitz or Ann Carlson dated from March 1, 2016 to April 30, 2016, which includes the term "Harvard." Both

faculty members receive an extraordinary number of emails that contain the term “Harvard,” including through academic email listservs and from other sources. Most of these emails have no relationship whatsoever to the April 2016 briefing at Harvard referenced in the request, or to litigation or potential litigation against fossil fuel companies for climate change harms. UCLA seeks clarification that it may exclude from its response emails that contain the word “Harvard” but that are not related to the April 2016 briefing at Harvard referenced in the request, or to litigation or potential litigation against fossil fuel companies for climate change harms.

Thanks,  
Cara

---

**From:** Carlson, Ann  
**Sent:** Monday, March 12, 2018 2:01 PM  
**To:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>; Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** Re: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

I realize we may not have a conference line? I'm calling in from a cell phone. I can create the conference from my iPhone if you send me the numbers where I should call you

Ann Carlson  
Shirley Shapiro Professor of Environmental Law  
Faculty Co-Director, Emmett Institute on Climate Change and the Environment  
UCLA School of Law  
(310) 206-9496

---

**From:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>  
**Sent:** Thursday, March 8, 2018 6:13:14 PM  
**To:** Carlson, Ann; Horowitz, Cara  
**Cc:** Baldrige, Robert; Donmez, Ayse  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Great - if you will be off campus, please just let me know what number we should use to conference you in.

Thanks!  
Marisa

---

**From:** Carlson, Ann [<mailto:carlson@law.ucla.edu>]  
**Sent:** Thursday, March 08, 2018 11:51 AM  
**To:** Horowitz, Cara <[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)>; Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** Re: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Not sure yet so conference line would be best. Thanks!

Ann Carlson  
Shirley Shapiro Professor of Environmental Law  
Faculty Co-Director, Emmett Institute on Climate Change and the Environment  
UCLA School of Law  
(310) 206-9496

---

**From:** Horowitz, Cara  
**Sent:** Thursday, March 8, 2018 11:46:31 AM  
**To:** Hawkins, Marisa; Carlson, Ann  
**Cc:** Baldrige, Robert; Donmez, Ayse  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Conference line is probably best (unless you'll be in the office and able to join me, Ann?). Thank you.

---

**From:** Hawkins, Marisa [<mailto:mhawkins@finance.ucla.edu>]  
**Sent:** Thursday, March 8, 2018 11:43 AM  
**To:** Carlson, Ann <[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)>; Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

That sounds good. We will call at 2pm on Monday – will we need to conference one of you in, or will you be together?

Thanks,  
Marisa

---

**From:** Carlson, Ann [<mailto:carlson@law.ucla.edu>]  
**Sent:** Thursday, March 08, 2018 11:39 AM  
**To:** Horowitz, Cara <[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)>; Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** Re: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

It also works for me and phone is fine for me (actually better).

Ann Carlson  
Shirley Shapiro Professor of Environmental Law  
Faculty Co-Director, Emmett Institute on Climate Change and the Environment  
UCLA School of Law  
(310) 206-9496

---

**From:** Horowitz, Cara  
**Sent:** Thursday, March 8, 2018 10:28:21 AM  
**To:** Hawkins, Marisa; Carlson, Ann  
**Cc:** Baldrige, Robert; Donmez, Ayse  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Yes for me, thanks. Should we do it by phone?

---

**From:** Hawkins, Marisa [<mailto:mhawkins@finance.ucla.edu>]  
**Sent:** Thursday, March 8, 2018 9:11 AM  
**To:** Carlson, Ann <[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)>; Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)>  
**Cc:** Baldridge, Robert <[rbaldridge@finance.ucla.edu](mailto:rbaldridge@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Dear Cara and Ann,

Would Monday at 2pm work for you both?

Thanks,  
Marisa

---

**From:** Carlson, Ann [<mailto:carlson@law.ucla.edu>]  
**Sent:** Wednesday, March 07, 2018 12:30 PM  
**To:** Horowitz, Cara <[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)>  
**Cc:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>; Baldridge, Robert <[rbaldridge@finance.ucla.edu](mailto:rbaldridge@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** Re: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Monday would work for me or Tuesday after 3. Thanks!

On Mar 7, 2018, at 12:21 PM, Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)> wrote:

Thank you, Marisa. Ann and I would like to discuss this request with counsel in your office. Would that be possible? Perhaps sometime early next week?

I am relatively free Monday afternoon (except from 3pm-3:30) and Tuesday afternoon after 1:30.

Thanks,  
Cara

Cara Horowitz  
Andrew Sabin Family Foundation Co-Executive Director  
Emmett Institute on Climate Change and the Environment  
UCLA School of Law  
Ph (310) 206-4033  
[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)  
[www.law.ucla.edu/emmett](http://www.law.ucla.edu/emmett)

---

**From:** Hawkins, Marisa [<mailto:mhawkins@finance.ucla.edu>]  
**Sent:** Thursday, March 1, 2018 12:02 PM  
**To:** Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)>; Carlson, Ann <[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Dear Professor Horowitz and Professor Carlson,

My name is Marisa Hawkins and I am a staff member at UCLA Information Practices, working under Robert Baldrige. Mr. Baldrige recommended that I reach out to you because we recently received the attached request under the California Public Records Act (CPRA) from Christopher C. Horner, a Senior Fellow at the Competitive Enterprise Institute.

The request is somewhat involved, so I have summarized it below. Briefly, it is seeking:

1. **Emails to or from Professor Horowitz and/or Professor Carlson, dated March 1, 2016 through April 30, 2016, meeting any of the following criteria:**
  - a. **That are to or from Shaun Goho; or**
  - b. **That contain any of the following terms:**
    - i. **Harvard**
    - ii. **Pawa**
    - iii. **Frumhoff**
    - iv. **UCS**
    - v. **Eubanks**
    - vi. **CIEL**
2. **Emails to or from Professor Horowitz and/or Professor Carlson, dated December 1, 2017 through January 31, 2018, meeting any of the following criteria:**
  - a. **That relate to an event (date not specified by the requester) at UCLA, which followed up on an April 25, 2016 event at Harvard Law School; or**
  - b. **That contain any of the following terms:**
    - i. **Frumhoff**
    - ii. **McKibbon**
    - iii. **Kimmell**
    - iv. **Union of Concerned Scientists**
    - v. **UCS**

vi. **@ucsusa.org**

Would you be able to provide any responsive emails to any or all of the above requests?

Please know that the Office of Legal Affairs (OLA) is already aware of this request and that any responsive records provided will be thoroughly reviewed and vetted with the input of OLA and redacted and/or withheld where possible, pursuant to the legal exemptions to disclosure under CPRA.

For your reference, I have included our guidelines regarding the collection and forwarding of responsive emails. Please feel free to contact me if you have any questions or concerns.

Best regards,

**Marisa Hawkins**

Senior Public Records Analyst

UCLA Information Practices

(310) 206-4159

[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

**From:** [Chris Horner](#)  
**To:** [records@ucla.edu](mailto:records@ucla.edu)  
**Subject:** REQUEST UNDER CALIFORNIA'S PUBLIC RECORDS ACT  
**Date:** Monday, February 05, 2018 12:14:09 PM  
**Attachments:** [CEI UCLA Harvard Meeting request.pdf](#)

---

Please see the attached.

1310 I Street, NW, 7th Floor  
Washington, DC 20005  
cei.org

202 331 1010 *voice*  
202 331 0640 *fax*



## REQUEST UNDER CALIFORNIA'S PUBLIC RECORDS ACT

February 5, 2018

Records Management & Information Practices  
10920 Wilshire Boulevard  
Suite 530  
Los Angeles, CA 90024-6541

**BY ELECTRONIC MAIL** — [records@ucla.edu](mailto:records@ucla.edu)

UCLA Records Management Officer,

On behalf of the Competitive Enterprise Institute (CEI), a non-profit public policy institute in Washington, DC and pursuant to the California Government Code §§ 6250 *et. seq.*, please provide us within 10 business days copies of certain described *information*, as follows:

I. copies of all correspondence and its accompanying information<sup>1</sup>, including also any attachments, that were sent by, sent to (including copying, whether as cc: or bcc:) or otherwise were received or are possessed by UCLA School of Law's **Cara Horowitz**, and/or **Ann Carlson**, dated from **March 1, 2016 to April 30, 2016**, inclusive, which are also:

- a) to or from Shaun Goho, *and/or*
- b) which use any of the following terms, *anywhere* in the correspondence be it the to, from, cc, bcc, and/or Subject fields and/or body of the email: i) Harvard, ii) Pawa, iii) Frumhoff, iv) UCS, v) Eubanks, and/or vi) CIEL (these terms are not case sensitive).

---

<sup>1</sup> This includes public records, and associated public information, see discussion of Data Delivery Standards, *infra*.



Public records show that Professor Horowitz participated in an April 25, 2016 briefing at Harvard Law School on “Potential Causes of Action Against Major Carbon Producers: Scientific, Legal and Historical Perspectives”, attended by other academics, environmentalist pressure group activists, private attorneys and public employees of various state attorney general offices. The agenda listed the participating UCLA faculty in their capacity as UCLA faculty. Other participants blogged about the event, with one publishing, in relevant part, “We were joined by a superb set of panelists, including ...Cara Horowitz, co-director of the Emmett Center on Climate Change and the Environment at UCLA Law School”. We seek correspondence relating to this trip, presentation, and other assistance provided Prof. Horowitz and/or her colleague Ms. Carlson to the extent this information was produced or received using University resources.

II. Similarly, UCLA held a followup event, moderated by Ms. Horowitz with the participation of Prof. Carlson specifically as “Shirley Shapiro professor of environmental law, and inaugural faculty director of the Emmett Institute on Climate Change and the Environment, UCLA School of Law” (not as an industry consultant). We also seek correspondence relating to this event, specifically from or to (whether as to, cc or bcc), or using, *anywhere* in the correspondence be it the to, from, cc, bcc, Subject fields or body of the email: a) **Frumhoff**, b) **McKibben**, c) **Kimmell**, d) **Union of Concerned Scientists**, and/or e) **UCS** (including but not limited to in e.g., @ucsusa.org).

Records responsive to *this* request will be dated during a now-month period **December 1, 2017 through January 31, 2018, inclusive**. Again, we seek entire email “threads” containing



any record responsive to this request regardless whether any part of that thread falls outside the search parameter.

**Please consider as responsive entire email “threads”** containing any information responsive to this request, regardless whether any part of that thread falls outside the cited search parameters.

**We request records on the University’s system**, e.g., its backend logs, not those which survive on a faculty member’s own machine or account.

**We do not demand your Office produce requested information in any particular form, instead we request records in their native form, with specific reference to the U.S. Securities and Exchange Commission Data Delivery Standards.<sup>2</sup>** The covered information we seek is electronic information, this includes electronic *records*, and other public *information*.

To quote the SEC Data Delivery Standards, “Electronic files must be produced in their native format, i.e. the format in which they are ordinarily used and maintained during the normal course of business. For example, an MS Excel file must be produced as an MS Excel file rather than an image of a spreadsheet. *(Note: An Adobe PDF file is not considered a native file unless the document was initially created as a PDF.)* (emphases in original).

In many native-format productions, certain public information remains contained in the record (e.g., metadata). Under the same standards, to ensure production of all information requested, if your production will be de-duplicated it is vital that you 1) preserve any unique

---

<sup>2</sup> <https://www.sec.gov/divisions/enforce/datadeliverystandards.pdf>.



metadata associated with the duplicate files, for example, custodian name, and, 2) make that unique metadata part of your production.

Native file productions may be produced without load files. However, native file productions must maintain the integrity of the original meta data, and must be produced as they are maintained in the normal course of business and organized by custodian-named file folders. A separate folder should be provided for each custodian.

In the event that necessity requires your Office to produce a PDF file, due to your normal program for redacting certain information and such that native files cannot be produced as they are maintained in the normal course of business, in order to provide all requested information each PDF file should be produced in separate folders named by the custodian, *and* accompanied by a load file to ensure the requested information appropriate for that discrete record is associated with that record. The required fields and format of the data to be provided within the load file can be found in Addendum A of the above-cited SEC Data Standards. All produced PDFs must be text searchable.

In the context of our experience with responsive agencies taking the effort to physically print, then (often, poorly) scan *electronic* mail into (typically, non-searchable) PDF files, we note that production of electronic records necessitates no such additional time, effort or other resources, and no photocopying expense. Any such effort as described is most reasonably viewed as an effort to frustrate the requester's use of the public information.



We understand we owe the office the cost of material, required to satisfy this request. We agree to pay legitimate expenses up to \$150.00. If you estimate costs will exceed that please notify us immediately and break down the expected costs.

The undersigned do not seek the information for a commercial purpose. CEI is organized and recognized by the Internal Revenue Service as a 501(c)3 educational organization. As such, it has no commercial interest possible in these records.

Also, CEI is a media organization, which the federal government has already acknowledged is the case for purposes of the federal FOIA.<sup>3</sup>

As such, we request a waiver of any fees involved, as release of these records is in the public interest and the Office is permitted to and does exercise discretion in waiving or reducing fees on that basis.

The campaign in which Profs. Carlson and Horowitz have involved themselves and the School using, and were invited to participate and is listed as participating in the Harvard event on the basis of, their UCLA credential<sup>4</sup>, is the subject of intense public, media, congressional oversight and now judicial interest — which is indeed a principal objective of the campaign.<sup>5</sup> It

---

<sup>3</sup> See e.g., Department of the Treasury FOIA Nos. 2012-08-053, 2012-08-054.

<sup>4</sup> See attached public record obtained from the Vermont Office of Attorney General, after judicial determination in December that this public record is not conceivably subject to any privilege.

<sup>5</sup> See, e.g., John O'Brien, "Exxon Prepares To Sue California Cities, Says They Contradict Themselves On Climate Change", *Forbes*, January 8, 2018, <https://www.forbes.com/sites/legalnewsline/2018/01/08/exxon-prepares-to-sue-california-cities-say-they-contradict-themselves-on-climate-change/amp/>; Andrew Scurria, "California Municipalities' Debt Disclosures Contrast With Climate Warnings", *Wall Street Journal*, January 8, 2018, <https://www.wsj.com/articles/california-municipalities-debt-disclosures-contrast-with-climate-warnings-1515456551>; see also <https://www.courthousenews.com/wp-content/uploads/2018/01/ExxonDepositions.pdf>.

1310 L Street, NW, 7th Floor  
Washington, DC 20005  
cei.org

202 331 1010 *voice*  
202 331 0640 *fax*



involves third-parties and plainly no relevant privilege with the exception of possible personal contact information if that information is not already posted on the websites of various participating universities, pressure groups and the like. The requested information is of critical importance to the nonprofit policy advocacy groups engaged on these relevant issues, news media covering the issues, and others concerned with government activities on this critical subject, or as the United States Supreme Court once noted in the context of the federal FOIA, what their government, which under open records laws includes publicly funded academic institutions, is up to.

If you have any questions please do not hesitate to contact me. We look forward to your timely response.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "C. Horner", with a long horizontal flourish extending to the right.

Christopher C. Horner  
Senior Fellow, CEI  
1310 L Street, NW, 7th Floor  
Washington D.C. 20007  
[chris.horner@cei.org](mailto:chris.horner@cei.org)  
202.262.4458



March 13, 2018

Records Management & Information Practices  
10920 Wilshire Boulevard  
Suite 530  
Los Angeles, CA 90024-6541

**BY ELECTRONIC MAIL** — [records@ucla.edu](mailto:records@ucla.edu), [pra@finance.ucla.edu](mailto:pra@finance.ucla.edu)

**Re: PRR # 18-5367**

UCLA Records Management Officer,

We have received your March 13, 2018 request for more specificity regarding a February 5, 2018 request of ours pursuant to the California Government Code.

You ask whether our request sent seven weeks ago seeks described records relating to the April 25, 2016 briefing at Harvard. That request specified that it seeks:

- I. copies of all correspondence and its accompanying information<sup>1</sup>, including also any attachments, that were sent by, sent to (including copying, whether as cc: or bcc:) or otherwise were received or are possessed by UCLA School of Law's Cara Horowitz, and/or Ann Carlson, dated from March 1, 2016 to April 30, 2016, inclusive, which are also:
  - a) to or from Shaun Goho, *and/or*
  - b) which use any of the following terms, *anywhere* in the correspondence be it the to, from, cc, bcc, and/or Subject fields and/or body of the email: i) Harvard, ii) Pawa, iii) Frumhoff, iv) UCS, v) Eubanks, and/or vi) CIEL (these terms are not case sensitive).

---

<sup>1</sup> This includes public records, and associated public information, see discussion of Data Delivery Standards, *infra*.



Public records show that Professor Horowitz participated in an April 25, 2016 briefing at Harvard Law School on “Potential Causes of Action Against Major Carbon Producers: Scientific, Legal and Historical Perspectives”, attended by other academics, environmentalist pressure group activists, private attorneys and public employees of various state attorney general offices. The agenda listed the participating UCLA faculty in their capacity as UCLA faculty. Other participants blogged about the event, with one publishing, in relevant part, “We were joined by a superb set of panelists, including ... Cara Horowitz, co-director of the Emmett Center on Climate Change and the Environment at UCLA Law School”. **We seek correspondence relating to this trip, presentation, and other assistance provided Prof. Horowitz and/or her colleague Ms. Carlson to the extent this information was produced or received using University resources.**

(emphasis added)

Although the closing sentence appears to answer your question, given the issue has been weighing on the school’s mind these many weeks, we will further clarify that this request seeks

\* copies of all correspondence [etc.] sent by, sent to (including copying, whether as cc: or bcc:) or otherwise received/possessed by Cara Horowitz, and/or Ann Carlson, dated from March 1, 2016 to April 30, 2016, inclusive, which are to or from Shaun Goho; and/or

\* copies of all correspondence [etc.] sent by, sent to (including copying, whether as cc: or bcc:) or otherwise received/possessed by Cara Horowitz, and/or Ann Carlson, dated from March 1, 2016 to April 30, 2016, inclusive, which use any of the following terms, *anywhere* in the



correspondence be it the to, from, cc, bcc, and/or Subject fields and/or body of the email: i)

Pawa, ii) Frumhoff, iii) UCS, iv) Eubanks, and/or v) CIEL (these terms are not case sensitive);

and/or

\* copies of all correspondence [etc.] sent by, sent to (including copying, whether as cc: or bcc:) or otherwise received/possessed by Cara Horowitz, and/or Ann Carlson, dated from March 1, 2016 to April 30, 2016, inclusive, which use Harvard *anywhere* in the correspondence be it the to, from, cc, bcc, and/or Subject fields and/or body of the email and which relates to the April 25, 2016 briefing at Harvard.

You also ask whether Part II of our request, addressing the UCLA follow-up event moderated by Ms. Horowitz with the participation of Prof. Carlson seeks certain specified correspondence relating to this event, which event is posted on the School's website <https://law.ucla.edu/news-and-events/4065/2018/1/25/Holding-Fossil-Fuel-Companies-Liable-for-Climate-Change-Harms-in-California-c--Law-Science-and-Justice/> (last visited today). The answer is that yes, it does.

We incorporate all instructions regarding information delivery standards, time parameters and other details in the original request as if repeated herein.

1310 L Street, NW, 7th Floor  
Washington, DC 20005  
cei.org

202 331 1010 *voice*  
202 331 0640 *fax*



If you have any questions please do not hesitate to contact me. We look forward to your timely response.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "C. Horner", is written over a light gray rectangular background.

Christopher C. Horner  
Senior Fellow, CEI  
1310 L Street, NW, 7th Floor  
Washington D.C. 20007  
[chris.horner@cei.org](mailto:chris.horner@cei.org)  
202.262.4458

## **Emails: Guidelines Regarding Collecting and Forwarding**

Please search your folders for any responsive emails, including archived folders/emails, and then provide them to us, preferably as attachments to a single email or, if too voluminous for that, as an Outlook PST file saved on a CD or flash drive. If you need help with searching and retrieving the emails, either your IT department or someone from my department will be able to assist you. Please know that all emails will be thoroughly reviewed by our department and Campus Counsel to see if any legal exemptions exist to prevent disclosure, (such as attorney-client privilege, or Academic Freedom regarding scholarly research, among others).

**If simply forwarding emails**, it is preferable that you **not** forward each one individually, as we would then not be able to print out and/or PDF/save each email without having it now include us in the correspondence (from you, to us), and so that portion would then have to be redacted back out of what is produced. Therefore, please use the method as seen in the attachment: "Guide to Forwarding Emails as Attachments to a Single Email," which provides screenshots and simple instructions.

As noted, if the amount of emails is too voluminous to forward as attachments to one or more emails, then creating a PST file in Outlook might be the best way to go...

**If creating a PST file:** In case you're not familiar with how to create a PST file to export your emails, the following link provides step-by-step instructions with pictures: <http://office.microsoft.com/en-us/outlook-help/export-outlook-items-to-an-outlook-data-file-pst-HA102534110.aspx>. We have also provided the steps below:

On the main Outlook screen click 'File' tab then select 'Options'

1. Click 'Advanced'
2. Under the export section click 'Export'
3. Select 'Export to a file' then click 'Next'
4. Select "Outlook Data File (.pst)" then click 'Next'
5. Select the desired folder and click 'Next'
6. Save the file to a location you'll be able to find later then click 'Finish'  
\*optional\* add a password and click 'OK'

Upload the created PST file to a CD or flash drive and then forward that to the attention of the Information Practices staff member handling the matter. If using Campus Mail, send it to the person's attention at Records Management and Information Practices, Wilshire Center, Suite 530. Mail code: 143348.

## Forwarding Emails as Attachments to a Single Email

As noted, if simply forwarding emails, it is preferable that you **not** forward each one individually, as I would then not be able to print out and/or PDF/save each email without having it now include me in the correspondence (from you, to me), and so that portion would then have to be redacted back out of what is produced. Therefore, please use the following method, which will be less time-consuming for both of us:

### Instructions for attaching emails to a single email:

#### Step 1:

While holding down the “Ctrl” key click on each responsive email, which will leave you with highlighted emails, as seen here:

The screenshot displays the Outlook interface for the account 'rbaldrige@finance.ucla.edu'. The left sidebar shows the 'Inbox' folder with 83 items, and several individual emails are listed and highlighted in blue. The main pane shows a list of these highlighted emails, including:

- Carrie Schmidt: RE: UCLA re California P... (4/28/2015)
- Carrie Schmidt: RE: UCLA re California P... (4/28/2015)
- Tamberg, Tod: RE: media request/ U-T... (4/28/2015)
- Tamberg, Tod: RE: media request/ U-T... (4/28/2015)
- Elliot Sosa: RE: Re: CPRA Request C... (4/28/2015)
- Romero-Ledezma...: PRR # 15-2899 CLOSED (4/28/2015)
- Judy, Elizabeth: Requisitions: updates a... (4/28/2015)
- NABR: Wall Street Journal Feat... (4/28/2015)
- Katsura, Rebecca: Fw: media request/ U-T... (4/27/2015)
- Laura Lake: Re: PRR 14-2426 (4/27/2015)

The right pane shows the details of the selected email from Carrie Schmidt, dated Tue 4/28/2015 11:26 AM. The subject is 'RE: UCLA re California Public Records Act Request'. The body text includes:

Thank you, Robert. Can you please hold that time? I just need to hear from one more person.

**From:** Baldridge, Robert [mailto:rbaldrige@finance.ucla.edu]  
**Sent:** Tuesday, April 28, 2015 10:59 AM  
**To:** Carrie Schmidt  
**Subject:** RE: UCLA re California Public Records Act Request

My only availability during that time would be 11:30 – 12:00.

**Robert Baldridge**  
Manager, UCLA Records Management & Information Practices  
Phone: (310) 206-0346 | [rbaldrige@ucla.edu](mailto:rbaldrige@ucla.edu)

**From:** Carrie Schmidt [mailto:Carrie.Schmidt@ucop.edu]  
**Sent:** Tuesday, April 28, 2015 10:51 AM  
**To:** Baldridge, Robert; Mangel, Susan; Rodgers, Numeya; Dan Scannell  
**Subject:** RE: UCLA re California Public Records Act Request

Good morning,

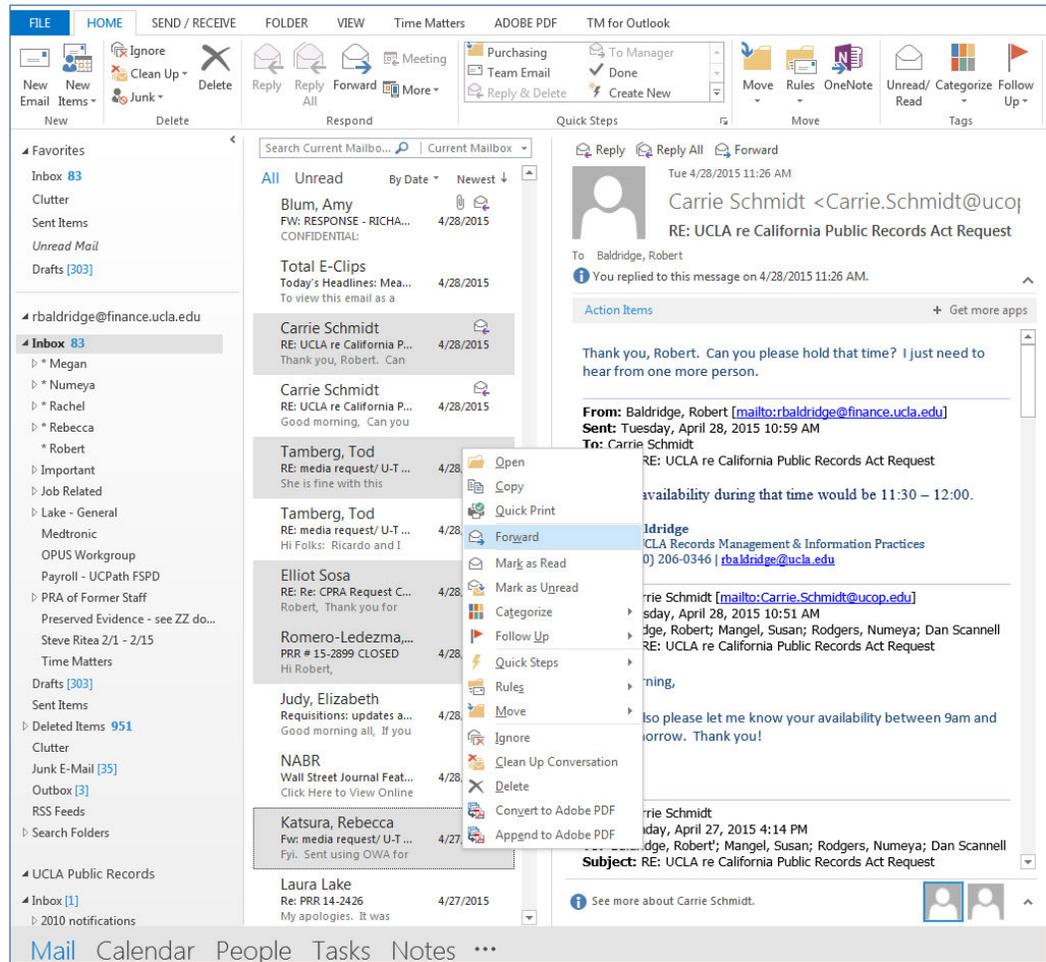
Can you also please let me know your availability between 9am and 12pm tomorrow. Thank you!

Carrie

**From:** Carrie Schmidt  
**Sent:** Monday, April 27, 2015 4:14 PM  
**To:** 'Baldridge, Robert'; Mangel, Susan; Rodgers, Numeya; Dan Scannell  
**Subject:** RE: UCLA re California Public Records Act Request

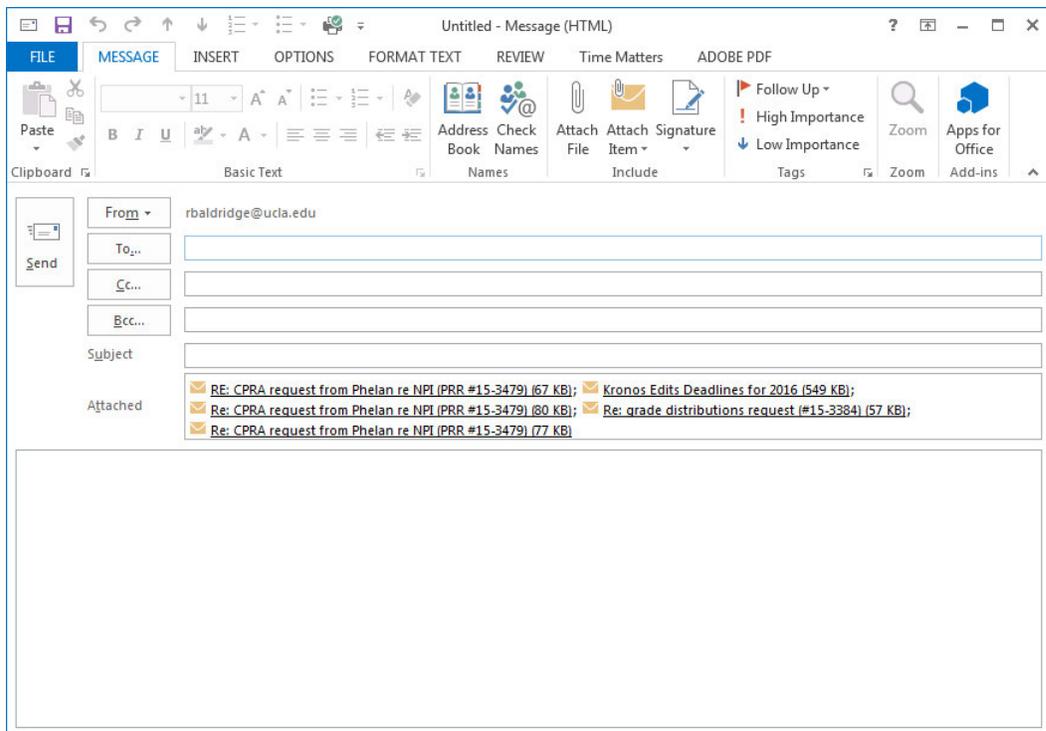
Step 2:

Then right-click on any of the highlighted emails, which will cause a dialog box to appear, as seen here. Scroll to “Forward” and left-click on it.



Step 3:

Thereafter, a new email will open up, with all the selected emails included as attachments. Now, simply forward that email to me.



**From:** [Horowitz, Cara](#)  
**To:** [Hawkins, Marisa](#); [Carlson, Ann E.](#)  
**Cc:** [Baldrige, Robert](#); [Donmez, Ayse](#)  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)  
**Date:** Tuesday, March 27, 2018 1:22:29 PM

---

Hi, Marisa – Thanks for checking in on this. I have blocked off a part of my day this Thursday to work on this. I expect that I will have somewhere in the neighborhood of a couple of hundred responsive emails, but I'm not sure yet. Will get back to you as soon as I have more information.

---

**From:** Hawkins, Marisa [mailto:[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)]  
**Sent:** Monday, March 26, 2018 6:42 PM  
**To:** Carlson, Ann <[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)>; Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Dear Ann and Cara,

I am following up to see if you have had the chance to locate any records responsive to the attached request and clarification. I have also attached our guidelines regarding the collection and forwarding of responsive emails. Do you have an idea of how many records there may be, or what your timeframe might be for gathering them?

Please feel free to contact me if you have any questions or concerns, and thanks for your help with this matter.

Best,  
Marisa

**Marisa Hawkins**

Senior Public Records Analyst  
UCLA Information Practices  
(310) 206-4159  
[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

---

**From:** Hawkins, Marisa  
**Sent:** Friday, March 16, 2018 3:42 PM  
**To:** Carlson, Ann <[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)>; Horowitz, Cara <[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Dear Ann,

In order to review the documents and get them to the requester by our due date, it would be ideal to have responsive records within the next week to ten days. Let me know if that is feasible for you, and we can work around your schedule.

Thanks,  
Marisa

---

**From:** Carlson, Ann [<mailto:carlson@law.ucla.edu>]  
**Sent:** Friday, March 16, 2018 3:23 PM  
**To:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>; Horowitz, Cara <[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** Re: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

What is the timing for responding?

Thanks for getting the clarification.

Ann Carlson  
Shirley Shapiro Professor of Environmental Law  
Faculty Co-Director, Emmett Institute on Climate Change and the Environment  
UCLA School of Law  
(310) 206-9496

---

**From:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>  
**Sent:** Friday, March 16, 2018 3:06:14 PM  
**To:** Horowitz, Cara; Carlson, Ann  
**Cc:** Baldrige, Robert; Donmez, Ayse  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Dear Cara and Ann,

Mr. Horner has responded to our request for clarification; I have attached his response for your reference.

With respect to the search term "Harvard" in Part I of his request, he has clarified that he is seeking **correspondence that both contains the term Harvard and relates to the April 25, 2016 briefing at Harvard.**

With respect to the UCLA event he speaks about in Part II of his request, he has clarified that he is referring to the following event: <https://law.ucla.edu/news-and-events/4065/2018/1/25/Holding-Fossil-Fuel-Companies-Liable-for-Climate-Change-Harms-in-California-c-Law-Science-and-Justice/>

Please don't hesitate to get in touch if you have any questions about his response, or about how to gather the documents for this matter.

Thank you once again for your help with this,  
Marisa

**Marisa Hawkins**

Senior Public Records Analyst  
UCLA Information Practices  
(310) 206-4159  
[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

---

**From:** Hawkins, Marisa**Sent:** Tuesday, March 13, 2018 10:46 AM**To:** Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)>; Carlson, Ann E. <[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)>**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Dear Cara and Ann,

Thank you for taking the time to talk yesterday, and for alerting us to the issues that require further clarification from the requester. We have sent a clarification letter to Mr. Horner, incorporating your language below. I will let you know as soon as we hear back from him. In the meantime, it would be very helpful if you could gather any responsive documents that are not affected by the clarification request, so that our office can begin the process of review.

Thanks once again for your help on this matter.

Best,  
Marisa

**Marisa Hawkins**

Senior Public Records Analyst  
UCLA Information Practices  
(310) 206-4159  
[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

---

**From:** Horowitz, Cara [<mailto:HOROWITZ@law.ucla.edu>]**Sent:** Monday, March 12, 2018 2:47 PM**To:** Carlson, Ann E. <[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)>; Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Thanks for the call today. As promised, here's information on seeking clarification as to Part II of the request:

-Part II of the request states that "UCLA held a follow-up event [to the April 2016 Harvard Law School workshop], moderated by Ms. Horowitz with the participation of Prof. Carlson", and asks for correspondence relating to this UCLA event that meets certain criteria. UCLA did not hold a follow-up event to the April 2016 Harvard Law School workshop. Does the requester intend to reference a public discussion of recently filed litigation by local governments against fossil fuel companies for

climate change harms, held at UCLA's Fowler Museum on January 25, 2018? That event was moderated by Ms. Horowitz, and Professor Carlson participated.

And here's a stab at asking for clarification on the Harvard emails point – Ann can weigh in here if she has other suggestions:

-Part I of the request asks for all correspondence sent, received, or possessed by Cara Horowitz or Ann Carlson dated from March 1, 2016 to April 30, 2016, which includes the term "Harvard." Both faculty members receive an extraordinary number of emails that contain the term "Harvard," including through academic email listservs and from other sources. Most of these emails have no relationship whatsoever to the April 2016 briefing at Harvard referenced in the request, or to litigation or potential litigation against fossil fuel companies for climate change harms. UCLA seeks clarification that it may exclude from its response emails that contain the word "Harvard" but that are not related to the April 2016 briefing at Harvard referenced in the request, or to litigation or potential litigation against fossil fuel companies for climate change harms.

Thanks,  
Cara

---

**From:** Carlson, Ann  
**Sent:** Monday, March 12, 2018 2:01 PM  
**To:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>; Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** Re: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

I realize we may not have a conference line? I'm calling in from a cell phone. I can create the conference from my iPhone if you send me the numbers where I should call you

Ann Carlson  
Shirley Shapiro Professor of Environmental Law  
Faculty Co-Director, Emmett Institute on Climate Change and the Environment  
UCLA School of Law  
(310) 206-9496

---

**From:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>  
**Sent:** Thursday, March 8, 2018 6:13:14 PM  
**To:** Carlson, Ann; Horowitz, Cara  
**Cc:** Baldrige, Robert; Donmez, Ayse  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Great - if you will be off campus, please just let me know what number we should use to conference you in.

Thanks!  
Marisa

---

**From:** Carlson, Ann [<mailto:carlson@law.ucla.edu>]  
**Sent:** Thursday, March 08, 2018 11:51 AM  
**To:** Horowitz, Cara <[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)>; Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** Re: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Not sure yet so conference line would be best. Thanks!

Ann Carlson  
Shirley Shapiro Professor of Environmental Law  
Faculty Co-Director, Emmett Institute on Climate Change and the Environment  
UCLA School of Law  
(310) 206-9496

---

**From:** Horowitz, Cara  
**Sent:** Thursday, March 8, 2018 11:46:31 AM  
**To:** Hawkins, Marisa; Carlson, Ann  
**Cc:** Baldrige, Robert; Donmez, Ayse  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Conference line is probably best (unless you'll be in the office and able to join me, Ann?). Thank you.

---

**From:** Hawkins, Marisa [<mailto:mhawkins@finance.ucla.edu>]  
**Sent:** Thursday, March 8, 2018 11:43 AM  
**To:** Carlson, Ann <[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)>; Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

That sounds good. We will call at 2pm on Monday – will we need to conference one of you in, or will you be together?

Thanks,  
Marisa

---

**From:** Carlson, Ann [<mailto:carlson@law.ucla.edu>]  
**Sent:** Thursday, March 08, 2018 11:39 AM  
**To:** Horowitz, Cara <[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)>; Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** Re: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

It also works for me and phone is fine for me (actually better).

Ann Carlson  
Shirley Shapiro Professor of Environmental Law

Faculty Co-Director, Emmett Institute on Climate Change and the Environment  
UCLA School of Law  
(310) 206-9496

---

**From:** Horowitz, Cara  
**Sent:** Thursday, March 8, 2018 10:28:21 AM  
**To:** Hawkins, Marisa; Carlson, Ann  
**Cc:** Baldrige, Robert; Donmez, Ayse  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Yes for me, thanks. Should we do it by phone?

---

**From:** Hawkins, Marisa [<mailto:mhawkins@finance.ucla.edu>]  
**Sent:** Thursday, March 8, 2018 9:11 AM  
**To:** Carlson, Ann <[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)>; Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Dear Cara and Ann,

Would Monday at 2pm work for you both?

Thanks,  
Marisa

---

**From:** Carlson, Ann [<mailto:carlson@law.ucla.edu>]  
**Sent:** Wednesday, March 07, 2018 12:30 PM  
**To:** Horowitz, Cara <[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)>  
**Cc:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>; Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** Re: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Monday would work for me or Tuesday after 3. Thanks!

On Mar 7, 2018, at 12:21 PM, Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)> wrote:

Thank you, Marisa. Ann and I would like to discuss this request with counsel in your office. Would that be possible? Perhaps sometime early next week?

I am relatively free Monday afternoon (except from 3pm-3:30) and Tuesday afternoon after 1:30.

Thanks,  
Cara

Cara Horowitz  
Andrew Sabin Family Foundation Co-Executive Director  
Emmett Institute on Climate Change and the Environment  
UCLA School of Law  
Ph (310) 206-4033  
[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)  
[www.law.ucla.edu/emmett](http://www.law.ucla.edu/emmett)

---

**From:** Hawkins, Marisa [<mailto:mhawkins@finance.ucla.edu>]  
**Sent:** Thursday, March 1, 2018 12:02 PM  
**To:** Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)>; Carlson, Ann <[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Dear Professor Horowitz and Professor Carlson,

My name is Marisa Hawkins and I am a staff member at UCLA Information Practices, working under Robert Baldrige. Mr. Baldrige recommended that I reach out to you because we recently received the attached request under the California Public Records Act (CPRA) from Christopher C. Horner, a Senior Fellow at the Competitive Enterprise Institute.

The request is somewhat involved, so I have summarized it below. Briefly, it is seeking:

1. **Emails to or from Professor Horowitz and/or Professor Carlson, dated March 1, 2016 through April 30, 2016, meeting any of the following criteria:**
  - a. **That are to or from Shaun Goho; or**
  - b. **That contain any of the following terms:**
    - i. **Harvard**
    - ii. **Pawa**
    - iii. **Frumhoff**
    - iv. **UCS**
    - v. **Eubanks**
    - vi. **CIEL**
2. **Emails to or from Professor Horowitz and/or Professor Carlson, dated December 1, 2017 through January 31, 2018, meeting any of the following criteria:**

- a. **That relate to an event (date not specified by the requester) at UCLA, which followed up on an April 25, 2016 event at Harvard Law School; or**
- b. **That contain any of the following terms:**
  - i. **Frumhoff**
  - ii. **McKibbon**
  - iii. **Kimmell**
  - iv. **Union of Concerned Scientists**
  - v. **UCS**
  - vi. **@ucsusa.org**

Would you be able to provide any responsive emails to any or all of the above requests?

Please know that the Office of Legal Affairs (OLA) is already aware of this request and that any responsive records provided will be thoroughly reviewed and vetted with the input of OLA and redacted and/or withheld where possible, pursuant to the legal exemptions to disclosure under CPRA.

For your reference, I have included our guidelines regarding the collection and forwarding of responsive emails. Please feel free to contact me if you have any questions or concerns.

Best regards,

**Marisa Hawkins**

Senior Public Records Analyst

UCLA Information Practices

(310) 206-4159

[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

**From:** [Hawkins, Marisa](#)  
**To:** [Horowitz, Cara](#); [Carlson, Ann E.](#)  
**Cc:** [Baldrige, Robert](#); [Donmez, Ayse](#)  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)  
**Date:** Tuesday, March 27, 2018 1:25:00 PM

---

Hi Cara,

Thanks so much, I'll look out for them.

Best,  
Marisa

---

**From:** Horowitz, Cara [mailto:[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)]  
**Sent:** Tuesday, March 27, 2018 1:22 PM  
**To:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>; Carlson, Ann E. <[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Hi, Marisa – Thanks for checking in on this. I have blocked off a part of my day this Thursday to work on this. I expect that I will have somewhere in the neighborhood of a couple of hundred responsive emails, but I'm not sure yet. Will get back to you as soon as I have more information.

---

**From:** Hawkins, Marisa [mailto:[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)]  
**Sent:** Monday, March 26, 2018 6:42 PM  
**To:** Carlson, Ann <[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)>; Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Dear Ann and Cara,

I am following up to see if you have had the chance to locate any records responsive to the attached request and clarification. I have also attached our guidelines regarding the collection and forwarding of responsive emails. Do you have an idea of how many records there may be, or what your timeframe might be for gathering them?

Please feel free to contact me if you have any questions or concerns, and thanks for your help with this matter.

Best,  
Marisa

**Marisa Hawkins**  
Senior Public Records Analyst  
UCLA Information Practices  
(310) 206-4159

[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

---

**From:** Hawkins, Marisa  
**Sent:** Friday, March 16, 2018 3:42 PM  
**To:** Carlson, Ann <[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)>; Horowitz, Cara <[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Dear Ann,

In order to review the documents and get them to the requester by our due date, it would be ideal to have responsive records within the next week to ten days. Let me know if that is feasible for you, and we can work around your schedule.

Thanks,  
Marisa

---

**From:** Carlson, Ann [<mailto:carlson@law.ucla.edu>]  
**Sent:** Friday, March 16, 2018 3:23 PM  
**To:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>; Horowitz, Cara <[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** Re: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

What is the timing for responding?

Thanks for getting the clarification.

Ann Carlson  
Shirley Shapiro Professor of Environmental Law  
Faculty Co-Director, Emmett Institute on Climate Change and the Environment  
UCLA School of Law  
(310) 206-9496

---

**From:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>  
**Sent:** Friday, March 16, 2018 3:06:14 PM  
**To:** Horowitz, Cara; Carlson, Ann  
**Cc:** Baldrige, Robert; Donmez, Ayse  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Dear Cara and Ann,

Mr. Horner has responded to our request for clarification; I have attached his response for your reference.

With respect to the search term "Harvard" in Part I of his request, he has clarified that he is seeking

**correspondence that both contains the term Harvard *and* relates to the April 25, 2016 briefing at Harvard.**

With respect to the UCLA event he speaks about in Part II of his request, he has clarified that he is referring to the following event: <https://law.ucla.edu/news-and-events/4065/2018/1/25/Holding-Fossil-Fuel-Companies-Liable-for-Climate-Change-Harms-in-California-c-Law-Science-and-Justice/>

Please don't hesitate to get in touch if you have any questions about his response, or about how to gather the documents for this matter.

Thank you once again for your help with this,  
Marisa

**Marisa Hawkins**

Senior Public Records Analyst  
UCLA Information Practices  
(310) 206-4159  
[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

---

**From:** Hawkins, Marisa  
**Sent:** Tuesday, March 13, 2018 10:46 AM  
**To:** Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)>; Carlson, Ann E. <[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)>  
**Cc:** Baldridge, Robert <[rbaldridge@finance.ucla.edu](mailto:rbaldridge@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Dear Cara and Ann,

Thank you for taking the time to talk yesterday, and for alerting us to the issues that require further clarification from the requester. We have sent a clarification letter to Mr. Horner, incorporating your language below. I will let you know as soon as we hear back from him. In the meantime, it would be very helpful if you could gather any responsive documents that are not affected by the clarification request, so that our office can begin the process of review.

Thanks once again for your help on this matter.

Best,  
Marisa

**Marisa Hawkins**

Senior Public Records Analyst  
UCLA Information Practices  
(310) 206-4159  
[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

---

**From:** Horowitz, Cara [<mailto:HOROWITZ@law.ucla.edu>]

**Sent:** Monday, March 12, 2018 2:47 PM

**To:** Carlson, Ann E. <[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)>; Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>

**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>

**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Thanks for the call today. As promised, here's information on seeking clarification as to Part II of the request:

-Part II of the request states that "UCLA held a follow-up event [to the April 2016 Harvard Law School workshop], moderated by Ms. Horowitz with the participation of Prof. Carlson", and asks for correspondence relating to this UCLA event that meets certain criteria. UCLA did not hold a follow-up event to the April 2016 Harvard Law School workshop. Does the requester intend to reference a public discussion of recently filed litigation by local governments against fossil fuel companies for climate change harms, held at UCLA's Fowler Museum on January 25, 2018? That event was moderated by Ms. Horowitz, and Professor Carlson participated.

And here's a stab at asking for clarification on the Harvard emails point – Ann can weigh in here if she has other suggestions:

-Part I of the request asks for all correspondence sent, received, or possessed by Cara Horowitz or Ann Carlson dated from March 1, 2016 to April 30, 2016, which includes the term "Harvard." Both faculty members receive an extraordinary number of emails that contain the term "Harvard," including through academic email listservs and from other sources. Most of these emails have no relationship whatsoever to the April 2016 briefing at Harvard referenced in the request, or to litigation or potential litigation against fossil fuel companies for climate change harms. UCLA seeks clarification that it may exclude from its response emails that contain the word "Harvard" but that are not related to the April 2016 briefing at Harvard referenced in the request, or to litigation or potential litigation against fossil fuel companies for climate change harms.

Thanks,  
Cara

---

**From:** Carlson, Ann

**Sent:** Monday, March 12, 2018 2:01 PM

**To:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>; Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)>

**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>

**Subject:** Re: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

I realize we may not have a conference line? I'm calling in from a cell phone. I can create the conference from my iPhone if you send me the numbers where I should call you

Ann Carlson  
Shirley Shapiro Professor of Environmental Law  
Faculty Co-Director, Emmett Institute on Climate Change and the Environment  
UCLA School of Law

(310) 206-9496

---

**From:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>  
**Sent:** Thursday, March 8, 2018 6:13:14 PM  
**To:** Carlson, Ann; Horowitz, Cara  
**Cc:** Baldrige, Robert; Donmez, Ayse  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Great - if you will be off campus, please just let me know what number we should use to conference you in.

Thanks!  
Marisa

---

**From:** Carlson, Ann [<mailto:carlson@law.ucla.edu>]  
**Sent:** Thursday, March 08, 2018 11:51 AM  
**To:** Horowitz, Cara <[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)>; Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** Re: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Not sure yet so conference line would be best. Thanks!

Ann Carlson  
Shirley Shapiro Professor of Environmental Law  
Faculty Co-Director, Emmett Institute on Climate Change and the Environment  
UCLA School of Law  
(310) 206-9496

---

**From:** Horowitz, Cara  
**Sent:** Thursday, March 8, 2018 11:46:31 AM  
**To:** Hawkins, Marisa; Carlson, Ann  
**Cc:** Baldrige, Robert; Donmez, Ayse  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Conference line is probably best (unless you'll be in the office and able to join me, Ann?). Thank you.

---

**From:** Hawkins, Marisa [<mailto:mhawkins@finance.ucla.edu>]  
**Sent:** Thursday, March 8, 2018 11:43 AM  
**To:** Carlson, Ann <[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)>; Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

That sounds good. We will call at 2pm on Monday – will we need to conference one of you in, or will you be together?

Thanks,

Marisa

---

**From:** Carlson, Ann [<mailto:carlson@law.ucla.edu>]  
**Sent:** Thursday, March 08, 2018 11:39 AM  
**To:** Horowitz, Cara <[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)>; Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** Re: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

It also works for me and phone is fine for me (actually better).

Ann Carlson  
Shirley Shapiro Professor of Environmental Law  
Faculty Co-Director, Emmett Institute on Climate Change and the Environment  
UCLA School of Law  
(310) 206-9496

---

**From:** Horowitz, Cara  
**Sent:** Thursday, March 8, 2018 10:28:21 AM  
**To:** Hawkins, Marisa; Carlson, Ann  
**Cc:** Baldrige, Robert; Donmez, Ayse  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Yes for me, thanks. Should we do it by phone?

---

**From:** Hawkins, Marisa [<mailto:mhawkins@finance.ucla.edu>]  
**Sent:** Thursday, March 8, 2018 9:11 AM  
**To:** Carlson, Ann <[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)>; Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Dear Cara and Ann,

Would Monday at 2pm work for you both?

Thanks,  
Marisa

---

**From:** Carlson, Ann [<mailto:carlson@law.ucla.edu>]  
**Sent:** Wednesday, March 07, 2018 12:30 PM  
**To:** Horowitz, Cara <[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)>  
**Cc:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>; Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** Re: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Monday would work for me or Tuesday after 3. Thanks!

On Mar 7, 2018, at 12:21 PM, Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)> wrote:

Thank you, Marisa. Ann and I would like to discuss this request with counsel in your office. Would that be possible? Perhaps sometime early next week?

I am relatively free Monday afternoon (except from 3pm-3:30) and Tuesday afternoon after 1:30.

Thanks,  
Cara

Cara Horowitz  
Andrew Sabin Family Foundation Co-Executive Director  
Emmett Institute on Climate Change and the Environment  
UCLA School of Law  
Ph (310) 206-4033  
[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)  
[www.law.ucla.edu/emmett](http://www.law.ucla.edu/emmett)

---

**From:** Hawkins, Marisa [<mailto:mhawkins@finance.ucla.edu>]  
**Sent:** Thursday, March 1, 2018 12:02 PM  
**To:** Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)>; Carlson, Ann <[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Dear Professor Horowitz and Professor Carlson,

My name is Marisa Hawkins and I am a staff member at UCLA Information Practices, working under Robert Baldrige. Mr. Baldrige recommended that I reach out to you because we recently received the attached request under the California Public Records Act (CPRA) from Christopher C. Horner, a Senior Fellow at the Competitive Enterprise Institute.

The request is somewhat involved, so I have summarized it below. Briefly, it is seeking:

1. **Emails to or from Professor Horowitz and/or Professor Carlson, dated March 1, 2016 through April 30, 2016, meeting any of the following criteria:**

- a. **That are to or from Shaun Goho; or**
  - b. **That contain any of the following terms:**
    - i. **Harvard**
    - ii. **Pawa**
    - iii. **Frumhoff**
    - iv. **UCS**
    - v. **Eubanks**
    - vi. **CIEL**
2. **Emails to or from Professor Horowitz and/or Professor Carlson, dated December 1, 2017 through January 31, 2018, meeting any of the following criteria:**
- a. **That relate to an event (date not specified by the requester) at UCLA, which followed up on an April 25, 2016 event at Harvard Law School; or**
  - b. **That contain any of the following terms:**
    - i. **Frumhoff**
    - ii. **McKibbon**
    - iii. **Kimmell**
    - iv. **Union of Concerned Scientists**
    - v. **UCS**
    - vi. **@ucsusa.org**

Would you be able to provide any responsive emails to any or all of the above requests?

Please know that the Office of Legal Affairs (OLA) is already aware of this request and that any responsive records provided will be thoroughly reviewed and vetted with the input of OLA and redacted and/or withheld where possible, pursuant to the legal exemptions to disclosure under CPRA.

For your reference, I have included our guidelines regarding the collection and forwarding of responsive emails. Please feel free to contact me if you have any questions or concerns.

Best regards,

**Marisa Hawkins**  
Senior Public Records Analyst  
UCLA Information Practices  
(310) 206-4159  
[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

**From:** [Carlson, Ann](#)  
**To:** [Horowitz, Cara](#)  
**Cc:** [Hawkins, Marisa](#); [Baldridge, Robert](#); [Donmez, Ayse](#)  
**Subject:** Re: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)  
**Date:** Wednesday, March 28, 2018 7:31:34 AM

---

I'm hoping next Monday will be ok as I'm on vacation for spring break.

On Mar 27, 2018, at 1:22 PM, Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)> wrote:

Hi, Marisa – Thanks for checking in on this. I have blocked off a part of my day this Thursday to work on this. I expect that I will have somewhere in the neighborhood of a couple of hundred responsive emails, but I'm not sure yet. Will get back to you as soon as I have more information.

---

**From:** Hawkins, Marisa [<mailto:mhawkins@finance.ucla.edu>]  
**Sent:** Monday, March 26, 2018 6:42 PM  
**To:** Carlson, Ann <[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)>; Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)>  
**Cc:** Baldridge, Robert <[rbaldridge@finance.ucla.edu](mailto:rbaldridge@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Dear Ann and Cara,

I am following up to see if you have had the chance to locate any records responsive to the attached request and clarification. I have also attached our guidelines regarding the collection and forwarding of responsive emails. Do you have an idea of how many records there may be, or what your timeframe might be for gathering them?

Please feel free to contact me if you have any questions or concerns, and thanks for your help with this matter.

Best,  
Marisa

**Marisa Hawkins**  
Senior Public Records Analyst  
UCLA Information Practices  
(310) 206-4159  
[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

---

**From:** Hawkins, Marisa  
**Sent:** Friday, March 16, 2018 3:42 PM  
**To:** Carlson, Ann <[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)>; Horowitz, Cara <[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)>

**Cc:** Baldridge, Robert <[rbaldridge@finance.ucla.edu](mailto:rbaldridge@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>

**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Dear Ann,

In order to review the documents and get them to the requester by our due date, it would be ideal to have responsive records within the next week to ten days. Let me know if that is feasible for you, and we can work around your schedule.

Thanks,  
Marisa

---

**From:** Carlson, Ann [<mailto:carlson@law.ucla.edu>]

**Sent:** Friday, March 16, 2018 3:23 PM

**To:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>; Horowitz, Cara <[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)>

**Cc:** Baldridge, Robert <[rbaldridge@finance.ucla.edu](mailto:rbaldridge@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>

**Subject:** Re: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

What is the timing for responding?

Thanks for getting the clarification.

Ann Carlson  
Shirley Shapiro Professor of Environmental Law  
Faculty Co-Director, Emmett Institute on Climate Change and the Environment  
UCLA School of Law  
(310) 206-9496

---

**From:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>

**Sent:** Friday, March 16, 2018 3:06:14 PM

**To:** Horowitz, Cara; Carlson, Ann

**Cc:** Baldridge, Robert; Donmez, Ayse

**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Dear Cara and Ann,

Mr. Horner has responded to our request for clarification; I have attached his response for your reference.

With respect to the search term “Harvard” in Part I of his request, he has clarified that he is seeking **correspondence that both contains the term Harvard and relates to the April 25, 2016 briefing at Harvard.**

With respect to the UCLA event he speaks about in Part II of his request, he has clarified that he is referring to the following event: <https://law.ucla.edu/news-and-events/4065/2018/1/25/Holding-Fossil-Fuel-Companies-Liable-for-Climate-Change-Harms-in-California-c-Law-Science-and-Justice/>

Please don't hesitate to get in touch if you have any questions about his response, or about how to gather the documents for this matter.

Thank you once again for your help with this,  
Marisa

**Marisa Hawkins**

Senior Public Records Analyst  
UCLA Information Practices  
(310) 206-4159  
[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

---

**From:** Hawkins, Marisa

**Sent:** Tuesday, March 13, 2018 10:46 AM

**To:** Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)>; Carlson, Ann E. <[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)>

**Cc:** Baldridge, Robert <[rbaldridge@finance.ucla.edu](mailto:rbaldridge@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>

**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Dear Cara and Ann,

Thank you for taking the time to talk yesterday, and for alerting us to the issues that require further clarification from the requester. We have sent a clarification letter to Mr. Horner, incorporating your language below. I will let you know as soon as we hear back from him. In the meantime, it would be very helpful if you could gather any responsive documents that are not affected by the clarification request, so that our office can begin the process of review.

Thanks once again for your help on this matter.

Best,  
Marisa

**Marisa Hawkins**

Senior Public Records Analyst  
UCLA Information Practices  
(310) 206-4159  
[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

---

**From:** Horowitz, Cara [<mailto:HOROWITZ@law.ucla.edu>]  
**Sent:** Monday, March 12, 2018 2:47 PM  
**To:** Carlson, Ann E. <[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)>; Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>  
**Cc:** Baldridge, Robert <[rbaldridge@finance.ucla.edu](mailto:rbaldridge@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Thanks for the call today. As promised, here's information on seeking clarification as to Part II of the request:

-Part II of the request states that "UCLA held a follow-up event [to the April 2016 Harvard Law School workshop], moderated by Ms. Horowitz with the participation of Prof. Carlson", and asks for correspondence relating to this UCLA event that meets certain criteria. UCLA did not hold a follow-up event to the April 2016 Harvard Law School workshop. Does the requester intend to reference a public discussion of recently filed litigation by local governments against fossil fuel companies for climate change harms, held at UCLA's Fowler Museum on January 25, 2018? That event was moderated by Ms. Horowitz, and Professor Carlson participated.

And here's a stab at asking for clarification on the Harvard emails point – Ann can weigh in here if she has other suggestions:

-Part I of the request asks for all correspondence sent, received, or possessed by Cara Horowitz or Ann Carlson dated from March 1, 2016 to April 30, 2016, which includes the term "Harvard." Both faculty members receive an extraordinary number of emails that contain the term "Harvard," including through academic email listservs and from other sources. Most of these emails have no relationship whatsoever to the April 2016 briefing at Harvard referenced in the request, or to litigation or potential litigation against fossil fuel companies for climate change harms. UCLA seeks clarification that it may exclude from its response emails that contain the word "Harvard" but that are not related to the April 2016 briefing at Harvard referenced in the request, or to litigation or potential litigation against fossil fuel companies for climate change harms.

Thanks,  
Cara

---

**From:** Carlson, Ann  
**Sent:** Monday, March 12, 2018 2:01 PM

**To:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>; Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)>

**Cc:** Baldridge, Robert <[rbaldridge@finance.ucla.edu](mailto:rbaldridge@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>

**Subject:** Re: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

I realize we may not have a conference line? I'm calling in from a cell phone. I can create the conference from my iPhone if you send me the numbers where I should call you

Ann Carlson  
Shirley Shapiro Professor of Environmental Law  
Faculty Co-Director, Emmett Institute on Climate Change and the Environment  
UCLA School of Law  
(310) 206-9496

---

**From:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>

**Sent:** Thursday, March 8, 2018 6:13:14 PM

**To:** Carlson, Ann; Horowitz, Cara

**Cc:** Baldridge, Robert; Donmez, Ayse

**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Great - if you will be off campus, please just let me know what number we should use to conference you in.

Thanks!  
Marisa

---

**From:** Carlson, Ann [<mailto:carlson@law.ucla.edu>]

**Sent:** Thursday, March 08, 2018 11:51 AM

**To:** Horowitz, Cara <[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)>; Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>

**Cc:** Baldridge, Robert <[rbaldridge@finance.ucla.edu](mailto:rbaldridge@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>

**Subject:** Re: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Not sure yet so conference line would be best. Thanks!

Ann Carlson  
Shirley Shapiro Professor of Environmental Law  
Faculty Co-Director, Emmett Institute on Climate Change and the Environment  
UCLA School of Law  
(310) 206-9496

---

**From:** Horowitz, Cara  
**Sent:** Thursday, March 8, 2018 11:46:31 AM  
**To:** Hawkins, Marisa; Carlson, Ann  
**Cc:** Baldridge, Robert; Donmez, Ayse  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Conference line is probably best (unless you'll be in the office and able to join me, Ann?). Thank you.

---

**From:** Hawkins, Marisa [<mailto:mhawkins@finance.ucla.edu>]  
**Sent:** Thursday, March 8, 2018 11:43 AM  
**To:** Carlson, Ann <[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)>; Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)>  
**Cc:** Baldridge, Robert <[rbaldridge@finance.ucla.edu](mailto:rbaldridge@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

That sounds good. We will call at 2pm on Monday – will we need to conference one of you in, or will you be together?

Thanks,  
Marisa

---

**From:** Carlson, Ann [<mailto:carlson@law.ucla.edu>]  
**Sent:** Thursday, March 08, 2018 11:39 AM  
**To:** Horowitz, Cara <[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)>; Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>  
**Cc:** Baldridge, Robert <[rbaldridge@finance.ucla.edu](mailto:rbaldridge@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** Re: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

It also works for me and phone is fine for me (actually better).

Ann Carlson  
Shirley Shapiro Professor of Environmental Law  
Faculty Co-Director, Emmett Institute on Climate Change and the Environment  
UCLA School of Law  
(310) 206-9496

---

**From:** Horowitz, Cara  
**Sent:** Thursday, March 8, 2018 10:28:21 AM  
**To:** Hawkins, Marisa; Carlson, Ann  
**Cc:** Baldridge, Robert; Donmez, Ayse

**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Yes for me, thanks. Should we do it by phone?

---

**From:** Hawkins, Marisa [<mailto:mhawkins@finance.ucla.edu>]  
**Sent:** Thursday, March 8, 2018 9:11 AM  
**To:** Carlson, Ann <[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)>; Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Dear Cara and Ann,

Would Monday at 2pm work for you both?

Thanks,  
Marisa

---

**From:** Carlson, Ann [<mailto:carlson@law.ucla.edu>]  
**Sent:** Wednesday, March 07, 2018 12:30 PM  
**To:** Horowitz, Cara <[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)>  
**Cc:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>; Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** Re: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Monday would work for me or Tuesday after 3. Thanks!

On Mar 7, 2018, at 12:21 PM, Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)> wrote:

Thank you, Marisa. Ann and I would like to discuss this request with counsel in your office. Would that be possible? Perhaps sometime early next week?

I am relatively free Monday afternoon (except from 3pm-3:30) and Tuesday afternoon after 1:30.

Thanks,  
Cara

Cara Horowitz  
Andrew Sabin Family Foundation Co-Executive Director

Emmett Institute on Climate Change and the Environment  
UCLA School of Law  
Ph (310) 206-4033  
[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)  
[www.law.ucla.edu/emmett](http://www.law.ucla.edu/emmett)

---

**From:** Hawkins, Marisa [<mailto:mhawkins@finance.ucla.edu>]  
**Sent:** Thursday, March 1, 2018 12:02 PM  
**To:** Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)>; Carlson, Ann <[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Dear Professor Horowitz and Professor Carlson,

My name is Marisa Hawkins and I am a staff member at UCLA Information Practices, working under Robert Baldrige. Mr. Baldrige recommended that I reach out to you because we recently received the attached request under the California Public Records Act (CPRA) from Christopher C. Horner, a Senior Fellow at the Competitive Enterprise Institute.

The request is somewhat involved, so I have summarized it below. Briefly, it is seeking:

1. **Emails to or from Professor Horowitz and/or Professor Carlson, dated March 1, 2016 through April 30, 2016, meeting any of the following criteria:**
  - a. **That are to or from Shaun Goho; or**
  - b. **That contain any of the following terms:**
    - i. **Harvard**
    - ii. **Pawa**
    - iii. **Frumhoff**
    - iv. **UCS**
    - v. **Eubanks**
    - vi. **CIEL**
2. **Emails to or from Professor Horowitz and/or Professor Carlson, dated December 1, 2017 through January 31, 2018, meeting any of the following criteria:**
  - a. **That relate to an event (date not specified by the**

**requester) at UCLA, which followed up on an April 25, 2016 event at Harvard Law School; or**

- b. **That contain any of the following terms:**
- i. **Frumhoff**
  - ii. **McKibbon**
  - iii. **Kimmell**
  - iv. **Union of Concerned Scientists**
  - v. **UCS**
  - vi. **@ucsusa.org**

Would you be able to provide any responsive emails to any or all of the above requests?

Please know that the Office of Legal Affairs (OLA) is already aware of this request and that any responsive records provided will be thoroughly reviewed and vetted with the input of OLA and redacted and/or withheld where possible, pursuant to the legal exemptions to disclosure under CPRA.

For your reference, I have included our guidelines regarding the collection and forwarding of responsive emails. Please feel free to contact me if you have any questions or concerns.

Best regards,

**Marisa Hawkins**

Senior Public Records Analyst

UCLA Information Practices

(310) 206-4159

[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

**From:** [Hawkins, Marisa](#)  
**To:** [Horowitz, Cara](#)  
**Cc:** [Baldridge, Robert](#); [Donmez, Ayse](#)  
**Subject:** RE: PRA request Horowitz 18-5367  
**Date:** Tuesday, April 03, 2018 9:34:00 AM

---

Dear Cara,

Thanks so much for sending these responsive emails along. I hope to take a closer look at them later in the week, after which we can touch base about the concerns you note below. In the meantime, I'll look out for anything you can find that is responsive to the second part of the request.

Thanks again!

Marisa

**Marisa Hawkins**

Senior Public Records Analyst  
UCLA Information Practices  
(310) 206-4159  
[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

---

**From:** Horowitz, Cara [mailto:HOROWITZ@law.ucla.edu]  
**Sent:** Thursday, March 29, 2018 4:59 PM  
**To:** Hawkins, Marisa <mhawkins@finance.ucla.edu>  
**Cc:** Baldridge, Robert <rbaldridge@finance.ucla.edu>; Donmez, Ayse <adonmez@finance.ucla.edu>  
**Subject:** PRA request Horowitz 18-5367

Dear Marisa:

Here are emails I found responsive to the first part of the PRA request from Competitive Enterprise Institute, asking for correspondence related to the meeting at Harvard on April 25, 2016, dated March 1 – April 30 2016. Some of these attachments may be duplicates of others; I may have been overinclusive in attaching emails when they came up in more than one search.

I believe that some of these emails, or some portions of these emails, should not be disclosed under the PRA because disclosure may not serve the public interest. Please let's discuss next week.

I am still searching for correspondence responsive to the second part of the request, regarding our event at UCLA in January 2018.

Thank you,  
Cara

Cara Horowitz  
Andrew Sabin Family Foundation Co-Executive Director

Emmett Institute on Climate Change and the Environment  
UCLA School of Law  
Ph (310) 206-4033  
[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)  
[www.law.ucla.edu/emmett](http://www.law.ucla.edu/emmett)

**From:** [Hawkins, Marisa](#)  
**To:** [Horowitz, Cara](#)  
**Subject:** RE: PRA request Horowitz 18-5367  
**Date:** Tuesday, May 01, 2018 10:31:50 AM

---

Hi Cara,

I apologize that it's taken me a while to circle back on this, but would you have time later this week for a call to discuss your concerns about the specific emails you mention below? Let me know if you have any availability, and we can set something up.

Also, were you able to find any responsive documents for the portion of the request covering the UCLA event?

Thanks once again for your help with this,  
Marisa

**Marisa Hawkins**

Senior Public Records Analyst  
UCLA Information Practices  
(310) 206-4159  
[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

---

**From:** Horowitz, Cara [mailto:HOROWITZ@law.ucla.edu]  
**Sent:** Thursday, March 29, 2018 4:59 PM  
**To:** Hawkins, Marisa <mhawkins@finance.ucla.edu>  
**Cc:** Baldrige, Robert <rbaldrige@finance.ucla.edu>; Donmez, Ayse <adonmez@finance.ucla.edu>  
**Subject:** PRA request Horowitz 18-5367

Dear Marisa:

Here are emails I found responsive to the first part of the PRA request from Competitive Enterprise Institute, asking for correspondence related to the meeting at Harvard on April 25, 2016, dated March 1 – April 30 2016. Some of these attachments may be duplicates of others; I may have been overinclusive in attaching emails when they came up in more than one search.

I believe that some of these emails, or some portions of these emails, should not be disclosed under the PRA because disclosure may not serve the public interest. Please let's discuss next week.

I am still searching for correspondence responsive to the second part of the request, regarding our event at UCLA in January 2018.

Thank you,  
Cara

Cara Horowitz  
Andrew Sabin Family Foundation Co-Executive Director  
Emmett Institute on Climate Change and the Environment  
UCLA School of Law  
Ph (310) 206-4033  
[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)  
[www.law.ucla.edu/emmett](http://www.law.ucla.edu/emmett)

**From:** [Horowitz, Cara](#)  
**To:** [Hawkins, Marisa](#)  
**Subject:** RE: PRA request Horowitz 18-5367  
**Date:** Monday, May 07, 2018 1:49:27 PM

---

Hi, Marisa! It's a good time to be checking back in because I just finished teaching. Can we set a time to talk this Wednesday? By then, I hope to have gotten you the rest of my responsive emails (the ones that relate to our January 2018 event here). I'm free on Wednesday at 2:30pm. Alternatively, I could talk any time on Thursday morning. Thanks.

---

**From:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>  
**Sent:** Tuesday, May 1, 2018 10:32 AM  
**To:** Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)>  
**Subject:** RE: PRA request Horowitz 18-5367

Hi Cara,

I apologize that it's taken me a while to circle back on this, but would you have time later this week for a call to discuss your concerns about the specific emails you mention below? Let me know if you have any availability, and we can set something up.

Also, were you able to find any responsive documents for the portion of the request covering the UCLA event?

Thanks once again for your help with this,  
Marisa

**Marisa Hawkins**

Senior Public Records Analyst  
UCLA Information Practices  
(310) 206-4159  
[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

---

**From:** Horowitz, Cara [<mailto:HOROWITZ@law.ucla.edu>]  
**Sent:** Thursday, March 29, 2018 4:59 PM  
**To:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>  
**Cc:** Baldridge, Robert <[rbaldridge@finance.ucla.edu](mailto:rbaldridge@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** PRA request Horowitz 18-5367

Dear Marisa:

Here are emails I found responsive to the first part of the PRA request from Competitive Enterprise Institute, asking for correspondence related to the meeting at Harvard on April 25, 2016, dated March 1 – April 30 2016. Some of these attachments may be duplicates of others; I may have been overinclusive in attaching emails when they came up in more than one search.

I believe that some of these emails, or some portions of these emails, should not be disclosed under the PRA because disclosure may not serve the public interest. Please let's discuss next week.

I am still searching for correspondence responsive to the second part of the request, regarding our event at UCLA in January 2018.

Thank you,  
Cara

Cara Horowitz  
Andrew Sabin Family Foundation Co-Executive Director  
Emmett Institute on Climate Change and the Environment  
UCLA School of Law  
Ph (310) 206-4033  
[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)  
[www.law.ucla.edu/emmett](http://www.law.ucla.edu/emmett)

**From:** [Hawkins, Marisa](#)  
**To:** [Horowitz, Cara](#)  
**Subject:** RE: PRA request Horowitz 18-5367  
**Date:** Tuesday, May 08, 2018 10:41:00 AM

---

Hi Cara,

Thursday morning sounds good – any time from 10am on would work for me. Should I call you at 10? Let me know if another time works better.

Thanks!  
Marisa

**Marisa Hawkins**

Senior Public Records Analyst  
UCLA Information Practices  
(310) 206-4159  
[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

---

**From:** Horowitz, Cara [mailto:[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)]  
**Sent:** Monday, May 07, 2018 1:49 PM  
**To:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>  
**Subject:** RE: PRA request Horowitz 18-5367

Hi, Marisa! It's a good time to be checking back in because I just finished teaching. Can we set a time to talk this Wednesday? By then, I hope to have gotten you the rest of my responsive emails (the ones that relate to our January 2018 event here). I'm free on Wednesday at 2:30pm. Alternatively, I could talk any time on Thursday morning. Thanks.

---

**From:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>  
**Sent:** Tuesday, May 1, 2018 10:32 AM  
**To:** Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)>  
**Subject:** RE: PRA request Horowitz 18-5367

Hi Cara,

I apologize that it's taken me a while to circle back on this, but would you have time later this week for a call to discuss your concerns about the specific emails you mention below? Let me know if you have any availability, and we can set something up.

Also, were you able to find any responsive documents for the portion of the request covering the UCLA event?

Thanks once again for your help with this,  
Marisa

**Marisa Hawkins**

Senior Public Records Analyst

UCLA Information Practices

(310) 206-4159

[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

---

**From:** Horowitz, Cara [<mailto:HOROWITZ@law.ucla.edu>]

**Sent:** Thursday, March 29, 2018 4:59 PM

**To:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>

**Cc:** Baldridge, Robert <[rbaldridge@finance.ucla.edu](mailto:rbaldridge@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>

**Subject:** PRA request Horowitz 18-5367

Dear Marisa:

Here are emails I found responsive to the first part of the PRA request from Competitive Enterprise Institute, asking for correspondence related to the meeting at Harvard on April 25, 2016, dated March 1 – April 30 2016. Some of these attachments may be duplicates of others; I may have been overinclusive in attaching emails when they came up in more than one search.

I believe that some of these emails, or some portions of these emails, should not be disclosed under the PRA because disclosure may not serve the public interest. Please let's discuss next week.

I am still searching for correspondence responsive to the second part of the request, regarding our event at UCLA in January 2018.

Thank you,

Cara

Cara Horowitz

Andrew Sabin Family Foundation Co-Executive Director

Emmett Institute on Climate Change and the Environment

UCLA School of Law

Ph (310) 206-4033

[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)

[www.law.ucla.edu/emmett](http://www.law.ucla.edu/emmett)

**From:** [Hawkins, Marisa](#)  
**To:** [Horowitz, Cara](#)  
**Subject:** RE: PRA request18-5367  
**Date:** Tuesday, May 08, 2018 10:42:00 AM

---

Hi Cara,

Thanks so much for sending these along. I'll take a look at them before we talk on Thursday.

Best,  
Marisa

**Marisa Hawkins**

Senior Public Records Analyst  
UCLA Information Practices  
(310) 206-4159  
[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

---

**From:** Horowitz, Cara [mailto:[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)]  
**Sent:** Monday, May 07, 2018 2:54 PM  
**To:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>  
**Subject:** PRA request18-5367

Dear Marisa – Here is an additional chunk of emails responsive to PRA request 18-5367, the portion of the request relating to a January 2018 event we held on campus.

I am continuing to search my emails and will let you know ASAP if I find others. I hope to have everything to you by the middle of this week.

Thank you,  
Cara

**From:** [Horowitz, Cara](#)  
**To:** [Hawkins, Marisa](#)  
**Subject:** RE: PRA request Horowitz 18-5367  
**Date:** Wednesday, May 09, 2018 3:29:42 PM

---

Hi, Marisa – Can we talk at about 11am tomorrow? Thanks. Sending you another responsive chunk now.

---

**From:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>  
**Sent:** Tuesday, May 8, 2018 10:47 AM  
**To:** Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)>  
**Subject:** RE: PRA request Horowitz 18-5367

Hi Cara,

Thursday morning sounds good – any time from 10am on would work for me. Should I call you at 10? Let me know if another time works better.

Thanks!  
Marisa

**Marisa Hawkins**

Senior Public Records Analyst  
UCLA Information Practices  
(310) 206-4159  
[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

---

**From:** Horowitz, Cara [<mailto:HOROWITZ@law.ucla.edu>]  
**Sent:** Monday, May 07, 2018 1:49 PM  
**To:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>  
**Subject:** RE: PRA request Horowitz 18-5367

Hi, Marisa! It's a good time to be checking back in because I just finished teaching. Can we set a time to talk this Wednesday? By then, I hope to have gotten you the rest of my responsive emails (the ones that relate to our January 2018 event here). I'm free on Wednesday at 2:30pm. Alternatively, I could talk any time on Thursday morning. Thanks.

---

**From:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>  
**Sent:** Tuesday, May 1, 2018 10:32 AM  
**To:** Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)>  
**Subject:** RE: PRA request Horowitz 18-5367

Hi Cara,

I apologize that it's taken me a while to circle back on this, but would you have time later this week

for a call to discuss your concerns about the specific emails you mention below? Let me know if you have any availability, and we can set something up.

Also, were you able to find any responsive documents for the portion of the request covering the UCLA event?

Thanks once again for your help with this,  
Marisa

**Marisa Hawkins**

Senior Public Records Analyst  
UCLA Information Practices  
(310) 206-4159  
[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

---

**From:** Horowitz, Cara [<mailto:HOROWITZ@law.ucla.edu>]  
**Sent:** Thursday, March 29, 2018 4:59 PM  
**To:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>  
**Cc:** Baldridge, Robert <[rbaldridge@finance.ucla.edu](mailto:rbaldridge@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** PRA request Horowitz 18-5367

Dear Marisa:

Here are emails I found responsive to the first part of the PRA request from Competitive Enterprise Institute, asking for correspondence related to the meeting at Harvard on April 25, 2016, dated March 1 – April 30 2016. Some of these attachments may be duplicates of others; I may have been overinclusive in attaching emails when they came up in more than one search.

I believe that some of these emails, or some portions of these emails, should not be disclosed under the PRA because disclosure may not serve the public interest. Please let's discuss next week.

I am still searching for correspondence responsive to the second part of the request, regarding our event at UCLA in January 2018.

Thank you,  
Cara

Cara Horowitz  
Andrew Sabin Family Foundation Co-Executive Director  
Emmett Institute on Climate Change and the Environment  
UCLA School of Law  
Ph (310) 206-4033  
[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)  
[www.law.ucla.edu/emmett](http://www.law.ucla.edu/emmett)

**From:** [Hawkins, Marisa](#)  
**To:** [Horowitz, Cara](#)  
**Subject:** RE: PRA request Horowitz 18-5367  
**Date:** Wednesday, May 09, 2018 5:37:00 PM

---

Hi Cara,

11am sounds good, talk to you then!

Thanks,  
Marisa

**Marisa Hawkins**

Senior Public Records Analyst  
UCLA Information Practices  
(310) 206-4159  
[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

---

**From:** Horowitz, Cara [mailto:[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)]  
**Sent:** Wednesday, May 09, 2018 3:30 PM  
**To:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>  
**Subject:** RE: PRA request Horowitz 18-5367

Hi, Marisa – Can we talk at about 11am tomorrow? Thanks. Sending you another responsive chunk now.

---

**From:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>  
**Sent:** Tuesday, May 8, 2018 10:47 AM  
**To:** Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)>  
**Subject:** RE: PRA request Horowitz 18-5367

Hi Cara,

Thursday morning sounds good – any time from 10am on would work for me. Should I call you at 10? Let me know if another time works better.

Thanks!  
Marisa

**Marisa Hawkins**

Senior Public Records Analyst  
UCLA Information Practices  
(310) 206-4159  
[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

**From:** Horowitz, Cara [<mailto:HOROWITZ@law.ucla.edu>]  
**Sent:** Monday, May 07, 2018 1:49 PM  
**To:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>  
**Subject:** RE: PRA request Horowitz 18-5367

Hi, Marisa! It's a good time to be checking back in because I just finished teaching. Can we set a time to talk this Wednesday? By then, I hope to have gotten you the rest of my responsive emails (the ones that relate to our January 2018 event here). I'm free on Wednesday at 2:30pm. Alternatively, I could talk any time on Thursday morning. Thanks.

---

**From:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>  
**Sent:** Tuesday, May 1, 2018 10:32 AM  
**To:** Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)>  
**Subject:** RE: PRA request Horowitz 18-5367

Hi Cara,

I apologize that it's taken me a while to circle back on this, but would you have time later this week for a call to discuss your concerns about the specific emails you mention below? Let me know if you have any availability, and we can set something up.

Also, were you able to find any responsive documents for the portion of the request covering the UCLA event?

Thanks once again for your help with this,  
Marisa

**Marisa Hawkins**

Senior Public Records Analyst  
UCLA Information Practices  
(310) 206-4159  
[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

---

**From:** Horowitz, Cara [<mailto:HOROWITZ@law.ucla.edu>]  
**Sent:** Thursday, March 29, 2018 4:59 PM  
**To:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>  
**Cc:** Baldridge, Robert <[rbaldridge@finance.ucla.edu](mailto:rbaldridge@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** PRA request Horowitz 18-5367

Dear Marisa:

Here are emails I found responsive to the first part of the PRA request from Competitive Enterprise Institute, asking for correspondence related to the meeting at Harvard on April 25, 2016, dated March 1 – April 30 2016. Some of these attachments may be duplicates of others; I may have been overinclusive in attaching emails when they came up in more than one search.

I believe that some of these emails, or some portions of these emails, should not be disclosed under the PRA because disclosure may not serve the public interest. Please let's discuss next week.

I am still searching for correspondence responsive to the second part of the request, regarding our event at UCLA in January 2018.

Thank you,  
Cara

Cara Horowitz  
Andrew Sabin Family Foundation Co-Executive Director  
Emmett Institute on Climate Change and the Environment  
UCLA School of Law  
Ph (310) 206-4033  
[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)  
[www.law.ucla.edu/emmett](http://www.law.ucla.edu/emmett)

**From:** [Horowitz, Cara](#)  
**To:** [Hawkins, Marisa](#)  
**Subject:** confirming receipt  
**Date:** Thursday, May 10, 2018 11:53:48 AM

---

Hi, Marisa – I just sent you two emails in the last few minutes, with attachments. Can you confirm whether you received them? Thanks!

Cara Horowitz  
Andrew Sabin Family Foundation Co-Executive Director  
Emmett Institute on Climate Change and the Environment  
UCLA School of Law  
Ph (310) 206-4033  
[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)  
[www.law.ucla.edu/emmett](http://www.law.ucla.edu/emmett)

**From:** [Hawkins, Marisa](#)  
**To:** [Horowitz, Cara](#)  
**Subject:** RE: confirming receipt  
**Date:** Thursday, May 10, 2018 11:58:00 AM

---

Hi Cara,

I got the one with the subject "FW: photos", but not the other. Want to try it again? If it doesn't go through, perhaps we can try Box.

Thanks!  
Marisa

**Marisa Hawkins**

Senior Public Records Analyst  
UCLA Information Practices  
(310) 206-4159  
[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

---

**From:** Horowitz, Cara [mailto:[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)]  
**Sent:** Thursday, May 10, 2018 11:54 AM  
**To:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>  
**Subject:** confirming receipt

Hi, Marisa – I just sent you two emails in the last few minutes, with attachments. Can you confirm whether you received them? Thanks!

Cara Horowitz  
Andrew Sabin Family Foundation Co-Executive Director  
Emmett Institute on Climate Change and the Environment  
UCLA School of Law  
Ph (310) 206-4033  
[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)  
[www.law.ucla.edu/emmett](http://www.law.ucla.edu/emmett)

**From:** [Hawkins, Marisa](#)  
**To:** [Horowitz, Cara](#)  
**Subject:** RE: PRA request Horowitz 18-5367  
**Date:** Thursday, May 10, 2018 12:08:26 PM

---

Looks like it came through OK – a set of three emails?

**Marisa Hawkins**

Senior Public Records Analyst  
UCLA Information Practices  
(310) 206-4159  
[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

---

**From:** Horowitz, Cara [mailto:[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)]  
**Sent:** Thursday, May 10, 2018 12:07 PM  
**To:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>  
**Subject:** FW: PRA request Horowitz 18-5367

Once more:

Cara Horowitz  
Andrew Sabin Family Foundation Co-Executive Director  
Emmett Institute on Climate Change and the Environment  
UCLA School of Law  
Ph (310) 206-4033  
[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)  
[www.law.ucla.edu/emmett](http://www.law.ucla.edu/emmett)

**From:** [Horowitz, Cara](#)  
**To:** [Hawkins, Marisa](#)  
**Subject:** RE: PRA request Horowitz 18-5367  
**Date:** Thursday, May 10, 2018 12:11:55 PM

---

Yes, I think so! If you got (a) the email with the attachment “photos”, sent earlier today, (b) the email I sent at 12:06 with a few large attachments, and (c) the email I sent at 12:07 with many attachments – that’s it for now. That’s what I tried to send yesterday.

Will keep searching today for more.

---

**From:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>  
**Sent:** Thursday, May 10, 2018 12:08 PM  
**To:** Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)>  
**Subject:** RE: PRA request Horowitz 18-5367

Looks like it came through OK – a set of three emails?

**Marisa Hawkins**

Senior Public Records Analyst  
UCLA Information Practices  
(310) 206-4159  
[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

---

**From:** Horowitz, Cara [<mailto:HOROWITZ@law.ucla.edu>]  
**Sent:** Thursday, May 10, 2018 12:07 PM  
**To:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>  
**Subject:** FW: PRA request Horowitz 18-5367

Once more:

Cara Horowitz  
Andrew Sabin Family Foundation Co-Executive Director  
Emmett Institute on Climate Change and the Environment  
UCLA School of Law  
Ph (310) 206-4033  
[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)  
[www.law.ucla.edu/emmett](http://www.law.ucla.edu/emmett)

**From:** [Hawkins, Marisa](#)  
**To:** [Horowitz, Cara](#)  
**Subject:** RE: PRA request Horowitz 18-5367  
**Date:** Thursday, May 10, 2018 12:20:00 PM

---

I hate to be the bearer of bad news...I got the emails sent at 11:49 and 12:07, but not the one sent at 12:06. That one seems to be getting stuck. Are the attachments to that email photos, by any chance? If so, you could try removing the photos, since they are the sort of thing we will often not produce. Thanks!

**Marisa Hawkins**

Senior Public Records Analyst  
UCLA Information Practices  
(310) 206-4159  
[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

---

**From:** Horowitz, Cara [<mailto:HOROWITZ@law.ucla.edu>]  
**Sent:** Thursday, May 10, 2018 12:12 PM  
**To:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>  
**Subject:** RE: PRA request Horowitz 18-5367

Yes, I think so! If you got (a) the email with the attachment “photos”, sent earlier today, (b) the email I sent at 12:06 with a few large attachments, and (c) the email I sent at 12:07 with many attachments – that’s it for now. That’s what I tried to send yesterday.

Will keep searching today for more.

---

**From:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>  
**Sent:** Thursday, May 10, 2018 12:08 PM  
**To:** Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)>  
**Subject:** RE: PRA request Horowitz 18-5367

Looks like it came through OK – a set of three emails?

**Marisa Hawkins**

Senior Public Records Analyst  
UCLA Information Practices  
(310) 206-4159  
[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

---

**From:** Horowitz, Cara [<mailto:HOROWITZ@law.ucla.edu>]  
**Sent:** Thursday, May 10, 2018 12:07 PM  
**To:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>  
**Subject:** FW: PRA request Horowitz 18-5367

Once more:

Cara Horowitz  
Andrew Sabin Family Foundation Co-Executive Director  
Emmett Institute on Climate Change and the Environment  
UCLA School of Law  
Ph (310) 206-4033  
[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)  
[www.law.ucla.edu/emmett](http://www.law.ucla.edu/emmett)

**From:** [Horowitz, Cara](#)  
**To:** [Hawkins, Marisa](#)  
**Subject:** RE: PRA request Horowitz 18-5367  
**Date:** Thursday, May 10, 2018 12:35:00 PM

---

Ok. Call me when you get a second so that I can be sure which one didn't come through, and I'll send another way. Thanks.

---

**From:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>  
**Sent:** Thursday, May 10, 2018 12:21 PM  
**To:** Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)>  
**Subject:** RE: PRA request Horowitz 18-5367

I hate to be the bearer of bad news...I got the emails sent at 11:49 and 12:07, but not the one sent at 12:06. That one seems to be getting stuck. Are the attachments to that email photos, by any chance? If so, you could try removing the photos, since they are the sort of thing we will often not produce. Thanks!

**Marisa Hawkins**

Senior Public Records Analyst  
UCLA Information Practices  
(310) 206-4159  
[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

---

**From:** Horowitz, Cara [<mailto:HOROWITZ@law.ucla.edu>]  
**Sent:** Thursday, May 10, 2018 12:12 PM  
**To:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>  
**Subject:** RE: PRA request Horowitz 18-5367

Yes, I think so! If you got (a) the email with the attachment "photos", sent earlier today, (b) the email I sent at 12:06 with a few large attachments, and (c) the email I sent at 12:07 with many attachments – that's it for now. That's what I tried to send yesterday.

Will keep searching today for more.

---

**From:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>  
**Sent:** Thursday, May 10, 2018 12:08 PM  
**To:** Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)>  
**Subject:** RE: PRA request Horowitz 18-5367

Looks like it came through OK – a set of three emails?

**Marisa Hawkins**

Senior Public Records Analyst  
UCLA Information Practices

(310) 206-4159

[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

---

**From:** Horowitz, Cara [<mailto:HOROWITZ@law.ucla.edu>]

**Sent:** Thursday, May 10, 2018 12:07 PM

**To:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>

**Subject:** FW: PRA request Horowitz 18-5367

Once more:

Cara Horowitz

Andrew Sabin Family Foundation Co-Executive Director

Emmett Institute on Climate Change and the Environment

UCLA School of Law

Ph (310) 206-4033

[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)

[www.law.ucla.edu/emmett](http://www.law.ucla.edu/emmett)

**From:** [Hawkins, Marisa](#)  
**To:** [Horowitz, Cara](#)  
**Subject:** RE: PRA request Horowitz 18-5367  
**Date:** Friday, May 11, 2018 12:02:17 PM

---

Hi Cara,

I'm sorry I wasn't able to call you back yesterday afternoon. I know you have commencement today, so I'm just sending you a breakdown of which emails made it through yesterday, and hopefully this will allow us to figure out if anything is missing:

1. You sent an email at 11:49am. Attached to it was:
  - a. FW: photos (1/18/18)
2. You sent an email at 12:07pm. Attached to it was:
  - a. FW: photo Palm avenue (1/18/18)
  - b. promoting Jan 25 Emmett Institute/IOES/UCS/Center for Climate Science climate liability event at the Fowler (1/12/18)
  - c. RE: High-res Emmett logo? (1/19/18)

Those are the two that made it through.

Hope you had a great commencement, and have a good weekend!

Marisa

**Marisa Hawkins**

Senior Public Records Analyst  
UCLA Information Practices  
(310) 206-4159  
[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

---

**From:** Horowitz, Cara [mailto:[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)]  
**Sent:** Thursday, May 10, 2018 12:35 PM  
**To:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>  
**Subject:** RE: PRA request Horowitz 18-5367

Ok. Call me when you get a second so that I can be sure which one didn't come through, and I'll send another way. Thanks.

---

**From:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>  
**Sent:** Thursday, May 10, 2018 12:21 PM  
**To:** Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)>  
**Subject:** RE: PRA request Horowitz 18-5367

I hate to be the bearer of bad news...I got the emails sent at 11:49 and 12:07, but not the one sent at

12:06. That one seems to be getting stuck. Are the attachments to that email photos, by any chance? If so, you could try removing the photos, since they are the sort of thing we will often not produce. Thanks!

**Marisa Hawkins**

Senior Public Records Analyst  
UCLA Information Practices  
(310) 206-4159  
[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

---

**From:** Horowitz, Cara [<mailto:HOROWITZ@law.ucla.edu>]  
**Sent:** Thursday, May 10, 2018 12:12 PM  
**To:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>  
**Subject:** RE: PRA request Horowitz 18-5367

Yes, I think so! If you got (a) the email with the attachment “photos”, sent earlier today, (b) the email I sent at 12:06 with a few large attachments, and (c) the email I sent at 12:07 with many attachments – that’s it for now. That’s what I tried to send yesterday.

Will keep searching today for more.

---

**From:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>  
**Sent:** Thursday, May 10, 2018 12:08 PM  
**To:** Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)>  
**Subject:** RE: PRA request Horowitz 18-5367

Looks like it came through OK – a set of three emails?

**Marisa Hawkins**

Senior Public Records Analyst  
UCLA Information Practices  
(310) 206-4159  
[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

---

**From:** Horowitz, Cara [<mailto:HOROWITZ@law.ucla.edu>]  
**Sent:** Thursday, May 10, 2018 12:07 PM  
**To:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>  
**Subject:** FW: PRA request Horowitz 18-5367

Once more:

Cara Horowitz  
Andrew Sabin Family Foundation Co-Executive Director  
Emmett Institute on Climate Change and the Environment

UCLA School of Law

Ph (310) 206-4033

[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)

[www.law.ucla.edu/emmett](http://www.law.ucla.edu/emmett)

**From:** [horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu) on behalf of [Box](#)  
**To:** [Hawkins, Marisa](#)  
**Subject:** CARA HOROWITZ has added you to a collaborated folder on Box  
**Date:** Friday, July 20, 2018 1:58:45 PM

---

CARA HOROWITZ has added you to a folder:



**PRA request 18-5367 Horowitz**  
Collaborated Folder

[View Folder](#)

Get [our app](#) to view this on mobile

"I'd like to share my files with you on Box"



© 2018

[About Box](#) • [Privacy Policy](#) • [Edit Notification Settings](#) • 900 Jefferson Avenue, Redwood City, CA 94063, USA

**From:** [Hawkins, Marisa](#)  
**To:** [Carlson, Ann](#); [Horowitz, Cara](#)  
**Subject:** RE: Competitive Enterprise Institute Request #2 Re Emails of Professors Horowitz and Carlson (18-5666)  
**Date:** Thursday, October 04, 2018 11:44:25 AM  
**Attachments:** [Request \(18-5666\).pdf](#)

---

Hi Ann and Cara,

I wanted to follow up on Christopher Horner's second records request (attached), to see if you have had a chance to look for any responsive records. We have pushed the due date for this request to the end of November, but since I anticipate that we will need an additional layer of review from campus counsel (which will add a week or two to the total time needed for review), it would be very helpful if you could pull the documents in the next couple of weeks. I will set up Box links for you both, so that you can simply drag and drop emails into Box. Given the likely volume of responsive emails, I believe that will be easier than sending them to me directly.

Please let me know if you have any questions at all, or would like to jump on a call – I am going to be out of the office this afternoon and tomorrow, but will be back Monday. Thank you both for your help, as always!

Best,  
Marisa

**Marisa Hawkins**

Senior Public Records Analyst  
UCLA Information Practices  
(310) 206-4159  
[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

---

**From:** Hawkins, Marisa  
**Sent:** Tuesday, June 12, 2018 12:40 PM  
**To:** 'Carlson, Ann' <[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)>; Horowitz, Cara <[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)>  
**Subject:** RE: Competitive Enterprise Institute Request #2 Re Emails of Professors Horowitz and Carlson (18-5666)

Hi Ann and Cara,

I apologize for my delayed response. I believe that with this records request, Christopher Horner does in fact intend for us to search for all terms exactly as he has listed them. I realize that this will result in a potentially large number of emails, but I do think he intends to throw a wide net this time, even if it does capture a number of irrelevant communications.

Do you have a rough idea of how many emails we might be talking about? A guesstimate is fine, as I will need to give Mr. Horner an estimated production date very soon.

Since we are likely to have a rather large number of emails (too many to forward individually), I've

attached our guidelines on collecting and sending along responsive emails. Alternatively, it is often easier to drag and drop large numbers of emails into a shared Box folder. Let me know if you'd rather do it that way, and I can set it up.

Thanks!  
Marisa

**Marisa Hawkins**

Senior Public Records Analyst  
UCLA Information Practices  
(310) 206-4159  
[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

---

**From:** Carlson, Ann [<mailto:carlson@law.ucla.edu>]  
**Sent:** Monday, May 28, 2018 8:46 AM  
**To:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>; Horowitz, Cara <[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)>  
**Subject:** Re: Competitive Enterprise Institute Request #2 Re Emails of Professors Horowitz and Carlson (18-5666)

Again, do I need to produce any correspondence that references the word Harvard? There will be many, none of which, I believe, they are interested in. Or am I misunderstanding the request in that they want "shaun goho" plus any of the additional words?

Ann Carlson  
Shirley Shapiro Professor of Environmental Law  
Faculty Co-Director, Emmett Institute on Climate Change and the Environment  
UCLA School of Law  
(310) 206-9496

---

**From:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>  
**Sent:** Friday, May 25, 2018 3:53 PM  
**To:** Carlson, Ann  
**Cc:** Baldrige, Robert; Donmez, Ayse  
**Subject:** Competitive Enterprise Institute Request #2 Re Emails of Professors Horowitz and Carlson (18-5666)

Dear Ann,

Information Practices has received a second request, herein attached, from Christopher Horner at the Competitive Enterprise Institute. This new request is seeking the following:

**“...copies of all correspondence and its accompanying information, including also any attachments, that were sent by, sent to (including copying, whether as cc: or bcc:) or otherwise were received or are possessed by UCLA School of Law’s Cara Horowitz, and/or Ann Carlson, dated from May 1, 2016 through the date you process this request, inclusive, which are also:**

**a) to or from Shaun Goho, *and/or***

**b) which use any of the following terms, *anywhere* in the correspondence be it the to, from, cc, bcc, and/or Subject fields and/or body of the email or attachments: i) Harvard, ii) Pawa, iii) Eubanks, iv) McKibben, v) Kimmell, vi) “Union of Concerned Scientists”, and/or vii) @ucsusa.org.”**

Would you be able to provide any responsive emails? Since this new request covers a span of two years, it would be helpful, as a preliminary matter, if you could give me an estimate of how many records we might be dealing with.

Please know that the Office of Legal Affairs (OLA) is already aware of this request and that any responsive records provided will be thoroughly reviewed and vetted with the input of OLA and redacted and/or withheld where possible, pursuant to the legal exemptions to disclosure under CPRA.

As always, please do not hesitate to contact me if you have questions or concerns, and thank you in advance for your assistance with this matter.

Best,  
Marisa

**Marisa Hawkins**

Senior Public Records Analyst

UCLA Information Practices

(310) 206-4159

[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

**From:** [Chris Horner](#)  
**To:** [records@ucla.edu](mailto:records@ucla.edu)  
**Subject:** REQUEST UNDER CALIFORNIA'S PUBLIC RECORDS ACT -- certain Horowitz, Carlson correspondence  
**Date:** Monday, May 21, 2018 2:53:36 PM  
**Attachments:** [CEI UCLA Horowitz Carlson UCS et al PRA request.pdf](#)

---

Please see the attached.

1310 L Street, NW, 7th Floor  
Washington, DC 20005  
cei.org

202 331 1010 *main*  
202 331 0640 *fax*



## REQUEST UNDER CALIFORNIA'S PUBLIC RECORDS ACT

May 21, 2018

Records Management & Information Practices  
10920 Wilshire Boulevard  
Suite 530  
Los Angeles, CA 90024-6541

**BY ELECTRONIC MAIL** — [records@ucla.edu](mailto:records@ucla.edu)

UCLA Records Management Officer,

On behalf of the Competitive Enterprise Institute (CEI), a non-profit public policy institute in Washington, DC and pursuant to the California Government Code §§ 6250 *et. seq.*, please provide us within 10 business days copies of all correspondence and its accompanying information<sup>1</sup>, including also any attachments, that were sent by, sent to (including copying, whether as cc: or bcc:) or otherwise were received or are possessed by UCLA School of Law's **Cara Horowitz**, and/or **Ann Carlson**, dated from **May 1, 2016** through the date you process this request, inclusive, which are also:

- a) to or from Shaun Goho, *and/or*
- b) which use any of the following terms, *anywhere* in the correspondence be it the to, from, cc, bcc, and/or Subject fields and/or body of the email or attachments: i) Harvard, ii) Pawa, iii) Eubanks, iv) McKibben, v) Kimmell, vi) "Union of Concerned Scientists", and/or vii) @ucsusa.org. None of these terms are case sensitive.

---

<sup>1</sup> This includes public records, and associated public information, see discussion of Data Delivery Standards, *infra*.



Public records show that Professors Horowitz and Carlson are using their positions at your public university to coordinate with certain activists groups in organizing and pursuing law enforcement and civil investigations and litigation against private opponents of a particular political agenda. We seek correspondence and other records illuminating this use of a public university faculty position and resources.

**Please consider as responsive entire email “threads”** containing any information responsive to this request, regardless whether any part of that thread falls outside the cited search parameters.

**We request records on the University’s system**, e.g., its backend logs, not those which survive on a faculty member’s own machine or account.

**We do not demand your Office produce requested information in any particular form, instead we request records in their native form, with specific reference to the U.S. Securities and Exchange Commission Data Delivery Standards.<sup>2</sup>** The covered information we seek is electronic information, this includes electronic *records*, and other public *information*.

To quote the SEC Data Delivery Standards, “Electronic files must be produced in their native format, i.e. the format in which they are ordinarily used and maintained during the normal course of business. For example, an MS Excel file must be produced as an MS Excel file rather than an image of a spreadsheet. *(Note: An Adobe PDF file is not considered a native file unless the document was initially created as a PDF.)* (emphases in original).

---

<sup>2</sup> <https://www.sec.gov/divisions/enforce/datadeliverystandards.pdf>



In many native-format productions, certain public information remains contained in the record (e.g., metadata). Under the same standards, to ensure production of all information requested, if your production will be de-duplicated it is vital that you 1) preserve any unique metadata associated with the duplicate files, for example, custodian name, and, 2) make that unique metadata part of your production.

Native file productions may be produced without load files. However, native file productions must maintain the integrity of the original meta data, and must be produced as they are maintained in the normal course of business and organized by custodian-named file folders. A separate folder should be provided for each custodian.

In the event that necessity requires your Office to produce a PDF file, due to your normal program for redacting certain information and such that native files cannot be produced as they are maintained in the normal course of business, in order to provide all requested information each PDF file should be produced in separate folders named by the custodian, *and* accompanied by a load file to ensure the requested information appropriate for that discrete record is associated with that record. The required fields and format of the data to be provided within the load file can be found in Addendum A of the above-cited SEC Data Standards. All produced PDFs must be text searchable.

In the context of our experience with responsive agencies taking the effort to physically print, then (often, poorly) scan *electronic* mail into (typically, non-searchable) PDF files, we note that production of electronic records necessitates no such additional time, effort or other

1310 L Street, NW, 7th Floor  
Washington, DC 20005  
cei.org

202 331 1010 *main*  
202 331 0640 *fax*



resources, and no photocopying expense. Any such effort as described is most reasonably viewed as an effort to frustrate the requester's use of the public information.

We understand we owe the office the cost of material, required to satisfy this request. We agree to pay legitimate expenses up to \$150.00. If you estimate costs will exceed that please notify us immediately and break down the expected costs.

The undersigned do not seek the information for a commercial purpose. CEI is organized and recognized by the Internal Revenue Service as a 501(c)3 educational organization. As such, it has no commercial interest possible in these records.

Also, CEI is a media organization, which the federal government has already acknowledged is the case for purposes of the federal FOIA.<sup>3</sup>

As such, we request a waiver of any fees involved, as release of these records is in the public interest and the Office is permitted to and does exercise discretion in waiving or reducing fees on that basis.

The campaign in which Profs. Carlson and Horowitz have involved themselves and the School using, and which they have participated in expressly on the basis of, their UCLA credential<sup>4</sup> is the subject of intense public, media, congressional oversight and now judicial

---

<sup>3</sup> See e.g., Department of the Treasury FOIA Nos. 2012-08-053, 2012-08-054.

<sup>4</sup> See, e.g., <https://law.ucla.edu/news-and-events/4065/2018/1/25/holding-fossil-fuel-companies-liable-for-climate-change-harms-in-california-c--law-science-and-justice---keynote-remarks-by-bill-mckibben/> and <https://blog.ucsusa.org/peter-frumhoff/scientists-state-prosecutors-fossil-fuel-companies-climate-accountability>.

1310 L Street, NW, 7th Floor  
Washington, DC 20005  
cei.org

202 331 1010 *main*  
202 331 0640 *fax*



interest<sup>5</sup> — which is indeed a principal objective of the campaign.<sup>6</sup> It involves third-parties and plainly no relevant privilege with the exception of possible personal contact information if that information is not already posted on the websites of various participating universities, pressure groups and the like. The requested information is of critical importance to the nonprofit policy advocacy groups engaged on these relevant issues, news media covering the issues, and any others concerned with government activities on this critical subject, or as the United States Supreme Court once noted in the context of the federal FOIA, what their government, which under open records laws includes publicly funded academic institutions, is up to.

If you have any questions please do not hesitate to contact me. We look forward to your timely response.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Chris Horner", with a long, sweeping horizontal line extending to the right.

Christopher C. Horner  
Senior Fellow, CEI  
[chris.horner@cei.org](mailto:chris.horner@cei.org)  
202.262.4458

---

<sup>5</sup> See, e.g., John O'Brien, "Exxon Prepares To Sue California Cities, Says They Contradict Themselves On Climate Change", *Forbes*, January 8, 2018, <https://www.forbes.com/sites/legalnewsline/2018/01/08/exxon-prepares-to-sue-california-cities-say-they-contradict-themselves-on-climate-change/amp/>; Andrew Scurria, "California Municipalities' Debt Disclosures Contrast With Climate Warnings", *Wall Street Journal*, January 8, 2018, <https://www.wsj.com/articles/california-municipalities-debt-disclosures-contrast-with-climate-warnings-1515456551>; see also <https://www.courthousenews.com/wp-content/uploads/2018/01/ExxonDepositions.pdf>.

<sup>6</sup> See, e.g., <http://eidclimate.org/video-attorney-admitted-press-coverage-might-important-winning-climate-lawsuits/>.

**From:** [noreply@box.com](mailto:noreply@box.com) on behalf of [CARA HOROWITZ](#)  
**To:** [Hawkins, Marisa](#)  
**Subject:** CARA HOROWITZ has accepted the invitation to your "Competitive Enterprise Institute #2 (18-5666) - Cara Horowitz" folder on Box  
**Date:** Thursday, October 04, 2018 11:47:35 AM

---

CARA HOROWITZ accepted your invitation to:



**Competitive Enterprise Institute #2  
(18-5666) - Cara Horowitz**

Collaborated Folder

[View Folder](#)

Get [our app](#) to view this on mobile



© 2018

[About Box](#) • [Privacy Policy](#) • [Edit Notification Settings](#) • 900 Jefferson Avenue, Redwood City, CA 94063, USA

**From:** [noreply@box.com](mailto:noreply@box.com) on behalf of [ANN CARLSON](#)  
**To:** [Hawkins, Marisa](#)  
**Subject:** ANN CARLSON has accepted the invitation to your "Competitive Enterprise Institute #2 (18-5666) - Ann Carlson" folder on Box  
**Date:** Thursday, October 04, 2018 11:48:14 AM

---

ANN CARLSON accepted your invitation to:


**Competitive Enterprise Institute #2  
(18-5666) - Ann Carlson**  
Collaborated Folder

[View Folder](#)

Get [our app](#) to view this on mobile



© 2018

[About Box](#) • [Privacy Policy](#) • [Edit Notification Settings](#) • 900 Jefferson Avenue, Redwood City, CA 94063, USA

**From:** [Hawkins, Marisa](#)  
**To:** [Baldrige, Robert](#)  
**Subject:** FW: Competitive Enterprise Institute Request #2 Re Emails of Professors Horowitz and Carlson (18-5666)  
**Date:** Thursday, November 01, 2018 5:50:55 PM  
**Attachments:** [Request \(18-5666\).pdf](#)

---

Hi Robert,

Here is a draft follow-up email for Cara Horowitz and Ann Carlson. Please feel free to use/revise/edit, etc. as necessary.

Thanks!  
Marisa

Dear Professors Horowitz and Carlson,

I am writing to follow up on Marisa Hawkins' email below, regarding the attached request under the California Public Records Act (CPRA) from Christopher Horner of the Competitive Enterprise Institute. His request seeks:

**"...copies of all correspondence and its accompanying information, including also any attachments, that were sent by, sent to (including copying, whether as cc: or bcc:) or otherwise were received or are possessed by UCLA School of Law's Cara Horowitz, and/or Ann Carlson, dated from May 1, 2016 through the date you process this request, inclusive, which are also:**

**a) to or from Shaun Goho, and/or**

**b) which use any of the following terms, anywhere in the correspondence be it the to, from, cc, bcc, and/or Subject fields and/or body of the email or attachments: i) Harvard, ii) Pawa, iii) Eubanks, iv) McKibben, v) Kimmell, vi) "Union of Concerned Scientists", and/or vii) @ucsusa.org."**

Our office is currently processing three requests from Mr. Horner: two that he filed under the auspices of the Competitive Enterprise Institute (these are the matters that seek your records), and one that was submitted by "Government Accountability and Oversight," an organization with which he is a Board Member (this matter seeks Sean Hecht's records). Mr. Horner has recently threatened to file a writ to compel production of the documents requested in the Sean Hecht matter.

On the assumption that Mr. Horner may shortly threaten legal action on the two matters seeking your records, it would be very helpful if you could provide us with the following information and/or documents with respect to Request #18-5666:

**1. If you do not have any responsive records, please let us know, as our ability to prove the**

**University's due diligence depends upon receiving confirmation from you that you either do or do not have any documents to produce; and**

- 2. If you do have any responsive records, please gather and produce them to our office as soon as possible, so that we can begin the often lengthy process of review and approval.**

We realize that Mr. Horner's request in 18-5666 is both broad and burdensome, and we apologize for the inconvenience. We would like to facilitate this process for you in any way we can, so please do not hesitate to let us know if we can answer any questions regarding this matter.

Best regards,

Robert Baldrige  
Manager, UCLA Records Management and Information Practices  
(310) 206-0346

---

**From:** Hawkins, Marisa  
**Sent:** Thursday, October 04, 2018 11:44 AM  
**To:** Carlson, Ann <carlson@law.ucla.edu>; Horowitz, Cara <horowitz@law.ucla.edu>  
**Subject:** RE: Competitive Enterprise Institute Request #2 Re Emails of Professors Horowitz and Carlson (18-5666)

Hi Ann and Cara,

I wanted to follow up on Christopher Horner's second records request (attached), to see if you have had a chance to look for any responsive records. We have pushed the due date for this request to the end of November, but since I anticipate that we will need an additional layer of review from campus counsel (which will add a week or two to the total time needed for review), it would be very helpful if you could pull the documents in the next couple of weeks. I will set up Box links for you both, so that you can simply drag and drop emails into Box. Given the likely volume of responsive emails, I believe that will be easier than sending them to me directly.

Please let me know if you have any questions at all, or would like to jump on a call – I am going to be out of the office this afternoon and tomorrow, but will be back Monday. Thank you both for your help, as always!

Best,  
Marisa

**Marisa Hawkins**  
Senior Public Records Analyst  
UCLA Information Practices  
(310) 206-4159  
[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

---

**From:** Hawkins, Marisa

**Sent:** Tuesday, June 12, 2018 12:40 PM

**To:** 'Carlson, Ann' <[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)>; Horowitz, Cara <[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)>

**Subject:** RE: Competitive Enterprise Institute Request #2 Re Emails of Professors Horowitz and Carlson (18-5666)

Hi Ann and Cara,

I apologize for my delayed response. I believe that with this records request, Christopher Horner does in fact intend for us to search for all terms exactly as he has listed them. I realize that this will result in a potentially large number of emails, but I do think he intends to throw a wide net this time, even if it does capture a number of irrelevant communications.

Do you have a rough idea of how many emails we might be talking about? A guesstimate is fine, as I will need to give Mr. Horner an estimated production date very soon.

Since we are likely to have a rather large number of emails (too many to forward individually), I've attached our guidelines on collecting and sending along responsive emails. Alternatively, it is often easier to drag and drop large numbers of emails into a shared Box folder. Let me know if you'd rather do it that way, and I can set it up.

Thanks!

Marisa

**Marisa Hawkins**

Senior Public Records Analyst

UCLA Information Practices

(310) 206-4159

[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

---

**From:** Carlson, Ann [<mailto:carlson@law.ucla.edu>]

**Sent:** Monday, May 28, 2018 8:46 AM

**To:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>

**Cc:** Baldridge, Robert <[rbaldridge@finance.ucla.edu](mailto:rbaldridge@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>;

Horowitz, Cara <[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)>

**Subject:** Re: Competitive Enterprise Institute Request #2 Re Emails of Professors Horowitz and Carlson (18-5666)

Again, do I need to produce any correspondence that references the word Harvard? There will be many, none of which, I believe, they are interested in. Or am I misunderstanding the request in that they want "shaun goho" plus any of the additional words?

Ann Carlson

Shirley Shapiro Professor of Environmental Law

Faculty Co-Director, Emmett Institute on Climate Change and the Environment

UCLA School of Law

(310) 206-9496

---

**From:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>  
**Sent:** Friday, May 25, 2018 3:53 PM  
**To:** Carlson, Ann  
**Cc:** Baldrige, Robert; Donmez, Ayse  
**Subject:** Competitive Enterprise Institute Request #2 Re Emails of Professors Horowitz and Carlson (18-5666)

Dear Ann,

Information Practices has received a second request, herein attached, from Christopher Horner at the Competitive Enterprise Institute. This new request is seeking the following:

**“...copies of all correspondence and its accompanying information, including also any attachments, that were sent by, sent to (including copying, whether as cc: or bcc:) or otherwise were received or are possessed by UCLA School of Law’s Cara Horowitz, and/or Ann Carlson, dated from May 1, 2016 through the date you process this request, inclusive, which are also:**

**a) to or from Shaun Goho, *and/or***

**b) which use any of the following terms, *anywhere* in the correspondence be it the to, from, cc, bcc, and/or Subject fields and/or body of the email or attachments: i) Harvard, ii) Pawa, iii) Eubanks, iv) McKibben, v) Kimmell, vi) “Union of Concerned Scientists”, and/or vii) @ucsusa.org.”**

Would you be able to provide any responsive emails? Since this new request covers a span of two years, it would be helpful, as a preliminary matter, if you could give me an estimate of how many records we might be dealing with.

Please know that the Office of Legal Affairs (OLA) is already aware of this request and that any responsive records provided will be thoroughly reviewed and vetted with the input of OLA and redacted and/or withheld where possible, pursuant to the legal exemptions to disclosure under CPRA.

As always, please do not hesitate to contact me if you have questions or concerns, and thank you in advance for your assistance with this matter.

Best,  
Marisa

**Marisa Hawkins**

Senior Public Records Analyst

UCLA Information Practices

(310) 206-4159

[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

**From:** [Chris Horner](#)  
**To:** [records@ucla.edu](mailto:records@ucla.edu)  
**Subject:** REQUEST UNDER CALIFORNIA'S PUBLIC RECORDS ACT -- certain Horowitz, Carlson correspondence  
**Date:** Monday, May 21, 2018 2:53:36 PM  
**Attachments:** [CEI UCLA Horowitz Carlson UCS et al PRA request.pdf](#)

---

Please see the attached.

1310 L Street, NW, 7th Floor  
Washington, DC 20005  
cei.org

202 331 1010 *main*  
202 331 0640 *fax*



## REQUEST UNDER CALIFORNIA'S PUBLIC RECORDS ACT

May 21, 2018

Records Management & Information Practices  
10920 Wilshire Boulevard  
Suite 530  
Los Angeles, CA 90024-6541

**BY ELECTRONIC MAIL** — [records@ucla.edu](mailto:records@ucla.edu)

UCLA Records Management Officer,

On behalf of the Competitive Enterprise Institute (CEI), a non-profit public policy institute in Washington, DC and pursuant to the California Government Code §§ 6250 *et. seq.*, please provide us within 10 business days copies of all correspondence and its accompanying information<sup>1</sup>, including also any attachments, that were sent by, sent to (including copying, whether as cc: or bcc:) or otherwise were received or are possessed by UCLA School of Law's **Cara Horowitz**, and/or **Ann Carlson**, dated from **May 1, 2016** through the date you process this request, inclusive, which are also:

- a) to or from Shaun Goho, *and/or*
- b) which use any of the following terms, *anywhere* in the correspondence be it the to, from, cc, bcc, and/or Subject fields and/or body of the email or attachments: i) Harvard, ii) Pawa, iii) Eubanks, iv) McKibben, v) Kimmell, vi) "Union of Concerned Scientists", and/or vii) @ucsusa.org. None of these terms are case sensitive.

---

<sup>1</sup> This includes public records, and associated public information, see discussion of Data Delivery Standards, *infra*.



Public records show that Professors Horowitz and Carlson are using their positions at your public university to coordinate with certain activists groups in organizing and pursuing law enforcement and civil investigations and litigation against private opponents of a particular political agenda. We seek correspondence and other records illuminating this use of a public university faculty position and resources.

**Please consider as responsive entire email “threads”** containing any information responsive to this request, regardless whether any part of that thread falls outside the cited search parameters.

**We request records on the University’s system**, e.g., its backend logs, not those which survive on a faculty member’s own machine or account.

**We do not demand your Office produce requested information in any particular form, instead we request records in their native form, with specific reference to the U.S. Securities and Exchange Commission Data Delivery Standards.<sup>2</sup>** The covered information we seek is electronic information, this includes electronic *records*, and other public *information*.

To quote the SEC Data Delivery Standards, “Electronic files must be produced in their native format, i.e. the format in which they are ordinarily used and maintained during the normal course of business. For example, an MS Excel file must be produced as an MS Excel file rather than an image of a spreadsheet. *(Note: An Adobe PDF file is not considered a native file unless the document was initially created as a PDF.)* (emphases in original).

---

<sup>2</sup> <https://www.sec.gov/divisions/enforce/datadeliverystandards.pdf>.



In many native-format productions, certain public information remains contained in the record (e.g., metadata). Under the same standards, to ensure production of all information requested, if your production will be de-duplicated it is vital that you 1) preserve any unique metadata associated with the duplicate files, for example, custodian name, and, 2) make that unique metadata part of your production.

Native file productions may be produced without load files. However, native file productions must maintain the integrity of the original meta data, and must be produced as they are maintained in the normal course of business and organized by custodian-named file folders. A separate folder should be provided for each custodian.

In the event that necessity requires your Office to produce a PDF file, due to your normal program for redacting certain information and such that native files cannot be produced as they are maintained in the normal course of business, in order to provide all requested information each PDF file should be produced in separate folders named by the custodian, *and* accompanied by a load file to ensure the requested information appropriate for that discrete record is associated with that record. The required fields and format of the data to be provided within the load file can be found in Addendum A of the above-cited SEC Data Standards. All produced PDFs must be text searchable.

In the context of our experience with responsive agencies taking the effort to physically print, then (often, poorly) scan *electronic* mail into (typically, non-searchable) PDF files, we note that production of electronic records necessitates no such additional time, effort or other

1310 L Street, NW, 7th Floor  
Washington, DC 20005  
cei.org

202 331 1010 *main*  
202 331 0640 *fax*



resources, and no photocopying expense. Any such effort as described is most reasonably viewed as an effort to frustrate the requester's use of the public information.

We understand we owe the office the cost of material, required to satisfy this request. We agree to pay legitimate expenses up to \$150.00. If you estimate costs will exceed that please notify us immediately and break down the expected costs.

The undersigned do not seek the information for a commercial purpose. CEI is organized and recognized by the Internal Revenue Service as a 501(c)3 educational organization. As such, it has no commercial interest possible in these records.

Also, CEI is a media organization, which the federal government has already acknowledged is the case for purposes of the federal FOIA.<sup>3</sup>

As such, we request a waiver of any fees involved, as release of these records is in the public interest and the Office is permitted to and does exercise discretion in waiving or reducing fees on that basis.

The campaign in which Profs. Carlson and Horowitz have involved themselves and the School using, and which they have participated in expressly on the basis of, their UCLA credential<sup>4</sup> is the subject of intense public, media, congressional oversight and now judicial

---

<sup>3</sup> See e.g., Department of the Treasury FOIA Nos. 2012-08-053, 2012-08-054.

<sup>4</sup> See, e.g., <https://law.ucla.edu/news-and-events/4065/2018/1/25/holding-fossil-fuel-companies-liable-for-climate-change-harms-in-california-c--law-science-and-justice---keynote-remarks-by-bill-mckibben/> and <https://blog.ucsusa.org/peter-frumhoff/scientists-state-prosecutors-fossil-fuel-companies-climate-accountability>.

1310 L Street, NW, 7th Floor  
Washington, DC 20005  
cei.org

202 331 1010 *main*  
202 331 0640 *fax*



interest<sup>5</sup> — which is indeed a principal objective of the campaign.<sup>6</sup> It involves third-parties and plainly no relevant privilege with the exception of possible personal contact information if that information is not already posted on the websites of various participating universities, pressure groups and the like. The requested information is of critical importance to the nonprofit policy advocacy groups engaged on these relevant issues, news media covering the issues, and any others concerned with government activities on this critical subject, or as the United States Supreme Court once noted in the context of the federal FOIA, what their government, which under open records laws includes publicly funded academic institutions, is up to.

If you have any questions please do not hesitate to contact me. We look forward to your timely response.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Chris Horner", with a long, sweeping horizontal line extending to the right.

Christopher C. Horner  
Senior Fellow, CEI  
[chris.horner@cei.org](mailto:chris.horner@cei.org)  
202.262.4458

---

<sup>5</sup> See, e.g., John O'Brien, "Exxon Prepares To Sue California Cities, Says They Contradict Themselves On Climate Change", *Forbes*, January 8, 2018, <https://www.forbes.com/sites/legalnewsline/2018/01/08/exxon-prepares-to-sue-california-cities-say-they-contradict-themselves-on-climate-change/amp/>; Andrew Scurria, "California Municipalities' Debt Disclosures Contrast With Climate Warnings", *Wall Street Journal*, January 8, 2018, <https://www.wsj.com/articles/california-municipalities-debt-disclosures-contrast-with-climate-warnings-1515456551>; see also <https://www.courthousenews.com/wp-content/uploads/2018/01/ExxonDepositions.pdf>.

<sup>6</sup> See, e.g., <http://eidclimate.org/video-attorney-admitted-press-coverage-might-important-winning-climate-lawsuits/>.

**From:** [Baldrige, Robert](#)  
**To:** [Carlson, Ann E.](#); [Horowitz, Cara](#)  
**Cc:** [Hawkins, Marisa](#); [Donmez, Ayse](#)  
**Subject:** FW: Competitive Enterprise Institute Request #2 Re Emails of Professors Horowitz and Carlson (18-5666)  
**Date:** Friday, November 02, 2018 3:44:10 PM  
**Attachments:** [Request \(18-5666\).pdf](#)

---

Dear Professors Horowitz and Carlson,

I am writing to follow up on Marisa Hawkins' email below, regarding the attached request submitted under the California Public Records Act (CPRA) from Christopher Horner of the Competitive Enterprise Institute. His request seeks:

**“...copies of all correspondence and its accompanying information, including also any attachments, that were sent by, sent to (including copying, whether as cc: or bcc:) or otherwise were received or are possessed by UCLA School of Law’s Cara Horowitz, and/or Ann Carlson, dated from May 1, 2016 through the date you process this request, inclusive, which are also:**

**a) to or from Shaun Goho, and/or**

**b) which use any of the following terms, anywhere in the correspondence be it the to, from, cc, bcc, and/or Subject fields and/or body of the email or attachments: i) Harvard, ii) Pawa, iii) Eubanks, iv) McKibben, v) Kimmell, vi) “Union of Concerned Scientists”, and/or vii) @ucsusa.org.”**

Our office is currently processing three requests from Mr. Horner: two that he filed under the auspices of the Competitive Enterprise Institute (these are the matters that seek your records), and one that was submitted by “Government Accountability and Oversight,” an organization with which he is a Board Member (this matter seeks Sean Hecht’s records). We are currently reviewing records provided to us by Prof. Hecht for the latter request. Regardless of our diligent efforts to collect and review potentially responsive records in a timely manner, yesterday Mr. Horner threatened to file a writ to compel production of the documents requested in the Sean Hecht matter.

On the assumption that Mr. Horner may shortly threaten legal action on the two matters seeking your records, it would be very helpful if you could provide us with the following with respect to Request #18-5666:

- 1. If you do not have any responsive records, please let us know, as our ability to prove the University’s due diligence depends upon receiving written confirmation from you that you either do or do not have any documents to produce; and**
- 2. If you do have any responsive records, please gather and produce them to our office as soon as possible, so that we can begin the often lengthy process of reviewing for exempt material and marking for redaction of such.**

We realize that Mr. Horner’s request in 18-5666 is both broad and burdensome, and we apologize for the inconvenience. We would like to facilitate this process for you in any way we can, so please do not hesitate to let us know if we can answer any questions regarding this matter.

Best regards,

Robert Baldrige  
Manager, UCLA Records Management and Information Practices

(310) 206-0346

---

**From:** Hawkins, Marisa  
**Sent:** Thursday, October 04, 2018 11:44 AM  
**To:** Carlson, Ann <[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)>; Horowitz, Cara <[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)>  
**Subject:** RE: Competitive Enterprise Institute Request #2 Re Emails of Professors Horowitz and Carlson (18-5666)

Hi Ann and Cara,

I wanted to follow up on Christopher Horner's second records request (attached), to see if you have had a chance to look for any responsive records. We have pushed the due date for this request to the end of November, but since I anticipate that we will need an additional layer of review from campus counsel (which will add a week or two to the total time needed for review), it would be very helpful if you could pull the documents in the next couple of weeks. I will set up Box links for you both, so that you can simply drag and drop emails into Box. Given the likely volume of responsive emails, I believe that will be easier than sending them to me directly.

Please let me know if you have any questions at all, or would like to jump on a call – I am going to be out of the office this afternoon and tomorrow, but will be back Monday. Thank you both for your help, as always!

Best,  
Marisa

**Marisa Hawkins**  
Senior Public Records Analyst  
UCLA Information Practices  
(310) 206-4159  
[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

---

**From:** Hawkins, Marisa  
**Sent:** Tuesday, June 12, 2018 12:40 PM  
**To:** 'Carlson, Ann' <[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)>; Horowitz, Cara <[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)>  
**Subject:** RE: Competitive Enterprise Institute Request #2 Re Emails of Professors Horowitz and Carlson (18-5666)

Hi Ann and Cara,

I apologize for my delayed response. I believe that with this records request, Christopher Horner does in fact intend for us to search for all terms exactly as he has listed them. I realize that this will result in a potentially large number of emails, but I do think he intends to throw a wide net this time, even if it does capture a number of irrelevant communications.

Do you have a rough idea of how many emails we might be talking about? A guesstimate is fine, as I will need to give Mr. Horner an estimated production date very soon.

Since we are likely to have a rather large number of emails (too many to forward individually), I've attached our guidelines on collecting and sending along responsive emails. Alternatively, it is often easier to drag and drop large numbers of emails into a shared Box folder. Let me know if you'd rather do it that way, and I can set it up.

Thanks!  
Marisa

**Marisa Hawkins**

Senior Public Records Analyst  
UCLA Information Practices  
(310) 206-4159  
[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

---

**From:** Carlson, Ann [<mailto:carlson@law.ucla.edu>]  
**Sent:** Monday, May 28, 2018 8:46 AM  
**To:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>; Horowitz, Cara <[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)>  
**Subject:** Re: Competitive Enterprise Institute Request #2 Re Emails of Professors Horowitz and Carlson (18-5666)

Again, do I need to produce any correspondence that references the word Harvard? There will be many, none of which, I believe, they are interested in. Or am I misunderstanding the request in that they want "shaun goho" plus any of the additional words?

Ann Carlson  
Shirley Shapiro Professor of Environmental Law  
Faculty Co-Director, Emmett Institute on Climate Change and the Environment  
UCLA School of Law  
(310) 206-9496

---

**From:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>  
**Sent:** Friday, May 25, 2018 3:53 PM  
**To:** Carlson, Ann  
**Cc:** Baldrige, Robert; Donmez, Ayse  
**Subject:** Competitive Enterprise Institute Request #2 Re Emails of Professors Horowitz and Carlson (18-5666)

Dear Ann,

Information Practices has received a second request, herein attached, from Christopher Horner at the Competitive Enterprise Institute. This new request is seeking the following:

**“...copies of all correspondence and its accompanying information, including also any attachments, that were sent by, sent to (including copying, whether as cc: or bcc:) or otherwise were received or are possessed by UCLA School of Law’s Cara Horowitz, and/or Ann Carlson, dated from May 1, 2016 through the date you process this request, inclusive, which are also:**

**a) to or from Shaun Goho, *and/or***

**b) which use any of the following terms, *anywhere* in the correspondence be it the to, from, cc, bcc, and/or Subject fields and/or body of the email or attachments: i) Harvard, ii) Pawa, iii) Eubanks, iv) McKibben, v) Kimmell, vi) “Union of Concerned Scientists”, and/or vii) @ucsusa.org.”**

Would you be able to provide any responsive emails? Since this new request covers a span of two years, it would be helpful, as a preliminary matter, if you could give me an estimate of how many records we might be dealing with.

Please know that the Office of Legal Affairs (OLA) is already aware of this request and that any responsive records provided will be thoroughly reviewed and vetted with the input of OLA and redacted and/or withheld where possible, pursuant to the legal exemptions to disclosure under CPRA.

As always, please do not hesitate to contact me if you have questions or concerns, and thank you in advance for your assistance with this matter.

Best,  
Marisa

**Marisa Hawkins**

Senior Public Records Analyst  
UCLA Information Practices  
(310) 206-4159  
[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

**From:** [Chris Horner](#)  
**To:** [records@ucla.edu](mailto:records@ucla.edu)  
**Subject:** REQUEST UNDER CALIFORNIA'S PUBLIC RECORDS ACT -- certain Horowitz, Carlson correspondence  
**Date:** Monday, May 21, 2018 2:53:36 PM  
**Attachments:** [CEI UCLA Horowitz Carlson UCS et al PRA request.pdf](#)

---

Please see the attached.

1310 L Street, NW, 7th Floor  
Washington, DC 20005  
cei.org

202 331 1010 *main*  
202 331 0640 *fax*



## REQUEST UNDER CALIFORNIA'S PUBLIC RECORDS ACT

May 21, 2018

Records Management & Information Practices  
10920 Wilshire Boulevard  
Suite 530  
Los Angeles, CA 90024-6541

**BY ELECTRONIC MAIL** — [records@ucla.edu](mailto:records@ucla.edu)

UCLA Records Management Officer,

On behalf of the Competitive Enterprise Institute (CEI), a non-profit public policy institute in Washington, DC and pursuant to the California Government Code §§ 6250 *et. seq.*, please provide us within 10 business days copies of all correspondence and its accompanying information<sup>1</sup>, including also any attachments, that were sent by, sent to (including copying, whether as cc: or bcc:) or otherwise were received or are possessed by UCLA School of Law's **Cara Horowitz**, and/or **Ann Carlson**, dated from **May 1, 2016** through the date you process this request, inclusive, which are also:

- a) to or from Shaun Goho, *and/or*
- b) which use any of the following terms, *anywhere* in the correspondence be it the to, from, cc, bcc, and/or Subject fields and/or body of the email or attachments: i) Harvard, ii) Pawa, iii) Eubanks, iv) McKibben, v) Kimmell, vi) "Union of Concerned Scientists", and/or vii) @ucsusa.org. None of these terms are case sensitive.

---

<sup>1</sup> This includes public records, and associated public information, see discussion of Data Delivery Standards, *infra*.

1310 L Street, NW, 7th Floor  
Washington, DC 20005  
cei.org

202 331 1010 *main*  
202 331 0640 *fax*



Public records show that Professors Horowitz and Carlson are using their positions at your public university to coordinate with certain activists groups in organizing and pursuing law enforcement and civil investigations and litigation against private opponents of a particular political agenda. We seek correspondence and other records illuminating this use of a public university faculty position and resources.

**Please consider as responsive entire email “threads”** containing any information responsive to this request, regardless whether any part of that thread falls outside the cited search parameters.

**We request records on the University’s system**, e.g., its backend logs, not those which survive on a faculty member’s own machine or account.

**We do not demand your Office produce requested information in any particular form, instead we request records in their native form, with specific reference to the U.S. Securities and Exchange Commission Data Delivery Standards.<sup>2</sup>** The covered information we seek is electronic information, this includes electronic *records*, and other public *information*.

To quote the SEC Data Delivery Standards, “Electronic files must be produced in their native format, i.e. the format in which they are ordinarily used and maintained during the normal course of business. For example, an MS Excel file must be produced as an MS Excel file rather than an image of a spreadsheet. *(Note: An Adobe PDF file is not considered a native file unless the document was initially created as a PDF.)* (emphases in original).

---

<sup>2</sup> <https://www.sec.gov/divisions/enforce/datadeliverystandards.pdf>.



In many native-format productions, certain public information remains contained in the record (e.g., metadata). Under the same standards, to ensure production of all information requested, if your production will be de-duplicated it is vital that you 1) preserve any unique metadata associated with the duplicate files, for example, custodian name, and, 2) make that unique metadata part of your production.

Native file productions may be produced without load files. However, native file productions must maintain the integrity of the original meta data, and must be produced as they are maintained in the normal course of business and organized by custodian-named file folders. A separate folder should be provided for each custodian.

In the event that necessity requires your Office to produce a PDF file, due to your normal program for redacting certain information and such that native files cannot be produced as they are maintained in the normal course of business, in order to provide all requested information each PDF file should be produced in separate folders named by the custodian, *and* accompanied by a load file to ensure the requested information appropriate for that discrete record is associated with that record. The required fields and format of the data to be provided within the load file can be found in Addendum A of the above-cited SEC Data Standards. All produced PDFs must be text searchable.

In the context of our experience with responsive agencies taking the effort to physically print, then (often, poorly) scan *electronic* mail into (typically, non-searchable) PDF files, we note that production of electronic records necessitates no such additional time, effort or other

1310 L Street, NW, 7th Floor  
Washington, DC 20005  
cei.org

202 331 1010 *main*  
202 331 0640 *fax*



resources, and no photocopying expense. Any such effort as described is most reasonably viewed as an effort to frustrate the requester's use of the public information.

We understand we owe the office the cost of material, required to satisfy this request. We agree to pay legitimate expenses up to \$150.00. If you estimate costs will exceed that please notify us immediately and break down the expected costs.

The undersigned do not seek the information for a commercial purpose. CEI is organized and recognized by the Internal Revenue Service as a 501(c)3 educational organization. As such, it has no commercial interest possible in these records.

Also, CEI is a media organization, which the federal government has already acknowledged is the case for purposes of the federal FOIA.<sup>3</sup>

As such, we request a waiver of any fees involved, as release of these records is in the public interest and the Office is permitted to and does exercise discretion in waiving or reducing fees on that basis.

The campaign in which Profs. Carlson and Horowitz have involved themselves and the School using, and which they have participated in expressly on the basis of, their UCLA credential<sup>4</sup> is the subject of intense public, media, congressional oversight and now judicial

---

<sup>3</sup> See e.g., Department of the Treasury FOIA Nos. 2012-08-053, 2012-08-054.

<sup>4</sup> See, e.g., <https://law.ucla.edu/news-and-events/4065/2018/1/25/holding-fossil-fuel-companies-liable-for-climate-change-harms-in-california-c--law-science-and-justice---keynote-remarks-by-bill-mckibben/> and <https://blog.ucsusa.org/peter-frumhoff/scientists-state-prosecutors-fossil-fuel-companies-climate-accountability>.

1310 L Street, NW, 7th Floor  
Washington, DC 20005  
cei.org

202 331 1010 *main*  
202 331 0640 *fax*



interest<sup>5</sup> — which is indeed a principal objective of the campaign.<sup>6</sup> It involves third-parties and plainly no relevant privilege with the exception of possible personal contact information if that information is not already posted on the websites of various participating universities, pressure groups and the like. The requested information is of critical importance to the nonprofit policy advocacy groups engaged on these relevant issues, news media covering the issues, and any others concerned with government activities on this critical subject, or as the United States Supreme Court once noted in the context of the federal FOIA, what their government, which under open records laws includes publicly funded academic institutions, is up to.

If you have any questions please do not hesitate to contact me. We look forward to your timely response.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "C. Horner", with a long, sweeping horizontal line extending to the right.

Christopher C. Horner  
Senior Fellow, CEI  
[chris.horner@cei.org](mailto:chris.horner@cei.org)  
202.262.4458

---

<sup>5</sup> See, e.g., John O'Brien, "Exxon Prepares To Sue California Cities, Says They Contradict Themselves On Climate Change", *Forbes*, January 8, 2018, <https://www.forbes.com/sites/legalnewsline/2018/01/08/exxon-prepares-to-sue-california-cities-say-they-contradict-themselves-on-climate-change/amp/>; Andrew Scurria, "California Municipalities' Debt Disclosures Contrast With Climate Warnings", *Wall Street Journal*, January 8, 2018, <https://www.wsj.com/articles/california-municipalities-debt-disclosures-contrast-with-climate-warnings-1515456551>; see also <https://www.courthousenews.com/wp-content/uploads/2018/01/ExxonDepositions.pdf>.

<sup>6</sup> See, e.g., <http://eidclimate.org/video-attorney-admitted-press-coverage-might-important-winning-climate-lawsuits/>.

**From:** [Hawkins, Marisa](#)  
**To:** [Carlson, Ann E.](#)  
**Subject:** Question re documents for CEI #1 (18-5367)  
**Date:** Friday, January 18, 2019 8:04:33 PM

---

Dear Ann,

I am in the process of reviewing the documents you produced in response to the first CEI request, and I have a couple of questions regarding one of the email chains you had flagged as a possible concern. Would you have time for a quick call on Tuesday to discuss it?

Thanks so much,  
Marisa

**Marisa Hawkins**

Senior Public Records Analyst  
UCLA Information Practices  
(310) 206-4159  
[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

**From:** [Carlson, Ann](#)  
**To:** [Hawkins, Marisa](#)  
**Subject:** Re: Question re documents for CEI #1 (18-5367)  
**Date:** Sunday, January 20, 2019 3:44:24 PM

---

Hi Marisa,

Tuesday is tough for me (I'm the chair of CAP and we meet all day Tuesdays). I'm pretty free Wednesday. Could we talk then instead?

Ann Carlson  
Shirley Shapiro Professor of Environmental Law  
Faculty Co-Director, Emmett Institute on Climate Change and the Environment  
UCLA School of Law  
(310) 206-9496

---

**From:** Hawkins, Marisa <mhawkins@finance.ucla.edu>  
**Sent:** Friday, January 18, 2019 8:04:34 PM  
**To:** Carlson, Ann  
**Subject:** Question re documents for CEI #1 (18-5367)

Dear Ann,

I am in the process of reviewing the documents you produced in response to the first CEI request, and I have a couple of questions regarding one of the email chains you had flagged as a possible concern. Would you have time for a quick call on Tuesday to discuss it?

Thanks so much,  
Marisa

**Marisa Hawkins**  
Senior Public Records Analyst  
UCLA Information Practices  
(310) 206-4159  
[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

**From:** [Hawkins, Marisa](#)  
**To:** [Carlson, Ann](#)  
**Subject:** RE: Question re documents for CEI #1 (18-5367)  
**Date:** Tuesday, January 22, 2019 10:20:22 AM

---

Hi Ann,

Wednesday would be fine – could I give you a call around 10:30? If that time doesn't work, I am open most of the day, with the exception of 12:30-2. Is your office number the best one to try?

Thanks!  
Marisa

**Marisa Hawkins**

Senior Public Records Analyst  
UCLA Information Practices  
(310) 206-4159  
[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

---

**From:** Carlson, Ann [mailto:[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)]  
**Sent:** Sunday, January 20, 2019 3:44 PM  
**To:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>  
**Subject:** Re: Question re documents for CEI #1 (18-5367)

Hi Marisa,

Tuesday is tough for me (I'm the chair of CAP and we meet all day Tuesdays). I'm pretty free Wednesday. Could we talk then instead?

Ann Carlson  
Shirley Shapiro Professor of Environmental Law  
Faculty Co-Director, Emmett Institute on Climate Change and the Environment  
UCLA School of Law  
(310) 206-9496

---

**From:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>  
**Sent:** Friday, January 18, 2019 8:04:34 PM  
**To:** Carlson, Ann  
**Subject:** Question re documents for CEI #1 (18-5367)

Dear Ann,

I am in the process of reviewing the documents you produced in response to the first CEI request, and I have a couple of questions regarding one of the email chains you had flagged as a possible concern. Would you have time for a quick call on Tuesday to discuss it?

Thanks so much,  
Marisa

**Marisa Hawkins**

Senior Public Records Analyst

UCLA Information Practices

(310) 206-4159

[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

**From:** [Horowitz, Cara](#)  
**To:** [Hawkins, Marisa](#)  
**Subject:** slides you asked about  
**Date:** Thursday, January 24, 2019 10:29:48 AM

---

Frumhoff's were slides 2-25. Thanks.

**From:** [Hawkins, Marisa](#)  
**To:** [Carlson, Ann E.](#)  
**Subject:** Question Re CEI Documents (18-5367)  
**Date:** Tuesday, March 12, 2019 7:19:31 PM

---

Hi Ann,

Would you have time for a quick call one day this week regarding the CEI records requests? I have a couple of quick questions I'd like to run by you before I release the next set of documents. Please let me know if there's a time that would work for you.

Thank you!

Marisa

**Marisa Hawkins**

Senior Public Records Analyst

UCLA Information Practices

(310) 206-4159

[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

**From:** [Carlson, Ann](#)  
**To:** [Hawkins, Marisa](#)  
**Subject:** Re: Question Re CEI Documents (18-5367)  
**Date:** Tuesday, March 12, 2019 7:33:43 PM

---

I can talk Friday morning?

On Mar 12, 2019, at 7:19 PM, Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)> wrote:

Hi Ann,

Would you have time for a quick call one day this week regarding the CEI records requests? I have a couple of quick questions I'd like to run by you before I release the next set of documents. Please let me know if there's a time that would work for you.

Thank you!  
Marisa

**Marisa Hawkins**  
Senior Public Records Analyst  
UCLA Information Practices  
(310) 206-4159  
[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

**From:** [Hawkins, Marisa](#)  
**To:** [Carlson, Ann](#)  
**Subject:** RE: Question Re CEI Documents (18-5367)  
**Date:** Tuesday, March 12, 2019 7:37:12 PM

---

That would be great – how about 10am?

---

**From:** Carlson, Ann [mailto:[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)]  
**Sent:** Tuesday, March 12, 2019 7:34 PM  
**To:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>  
**Subject:** Re: Question Re CEI Documents (18-5367)

I can talk Friday morning?

On Mar 12, 2019, at 7:19 PM, Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)> wrote:

Hi Ann,

Would you have time for a quick call one day this week regarding the CEI records requests? I have a couple of quick questions I'd like to run by you before I release the next set of documents. Please let me know if there's a time that would work for you.

Thank you!  
Marisa

**Marisa Hawkins**  
Senior Public Records Analyst  
UCLA Information Practices  
(310) 206-4159  
[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

**From:** [Hawkins, Marisa](#)  
**To:** [vic@sheredling.com](mailto:vic@sheredling.com)  
**Cc:** [Baldrige, Robert](#); [Donmez, Ayse](#)  
**Subject:** Courtesy Notification Re California Public Records Request at UCLA (18-5367 and 18-5666)  
**Date:** Thursday, January 24, 2019 3:42:13 PM  
**Attachments:** [CEI BATCH 3 - MARKUP \(18-5367 and 18-5666\) - Sher Notification.pdf](#)

---

Dear Mr. Sher,

My name is Marisa Hawkins and I am a Public Records Analyst at UCLA Information Practices. Our office has received two requests for documents under the California Public Records Act (CPRA) from Christopher Horner of the Competitive Enterprise Institute (CEI). These requests seek various emails of Ann Carlson and Cara Horowitz.

Our office is in the process of responding to these public records requests, and among the responsive documents we have collected from Professors Carlson and Horowitz are several PowerPoint slides that originated with you. Professor Carlson has walked me through the attached document and believes that pages 3 and 4 come from a deck of your slides, as do the quotes on pages 5, 6, and 7.

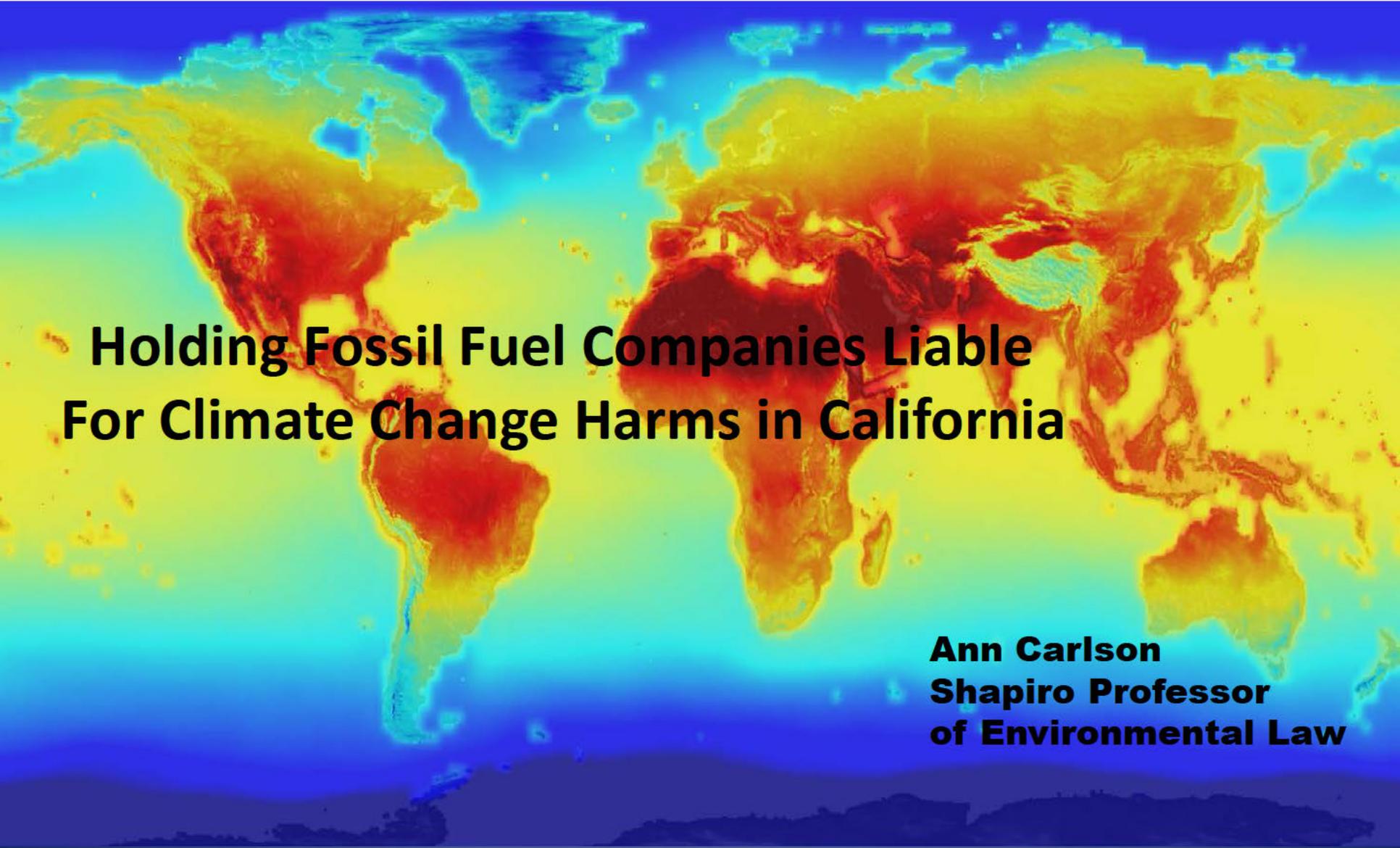
If you object to the release of pages 3-7 of the attached set of slides, I would greatly appreciate it if you could let me know as soon as possible, as we plan to produce responsive records to CEI within the next week.

Please do not hesitate to contact me if you have any questions.

Best regards,

**Marisa Hawkins**

Senior Public Records Analyst  
UCLA Information Practices  
(310) 206-4159  
[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)



# Holding Fossil Fuel Companies Liable For Climate Change Harms in California

**Ann Carlson**  
**Shapiro Professor**  
**of Environmental Law**

THE EMMETT INSTITUTE

ON CLIMATE CHANGE AND THE ENVIRONMENT



UCLA | SCHOOL OF LAW

Better science connecting emissions to harm, including sea level rise (almost linear relationship), magnitude of drought, extreme heat, extreme rain, wildfires

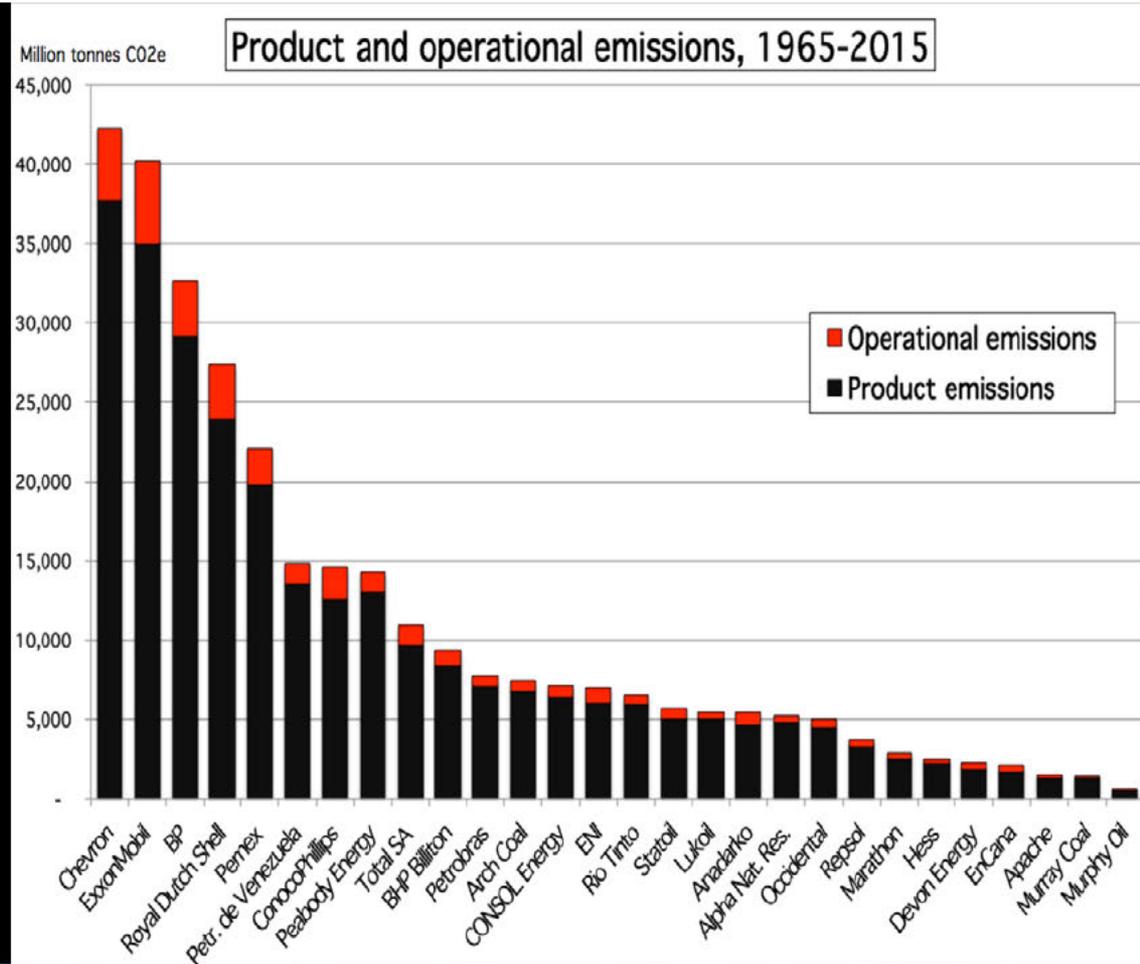
Extractor defendants contribute a huge percentage of total global emissions. Over the past 50 years, 28 U.S. tied companies have contributed 25 percent of total global CO2 emissions.

New evidence about API, Exxon knowledge of climate change and its harms as long as 50 years ago, extensive campaign of disinformation

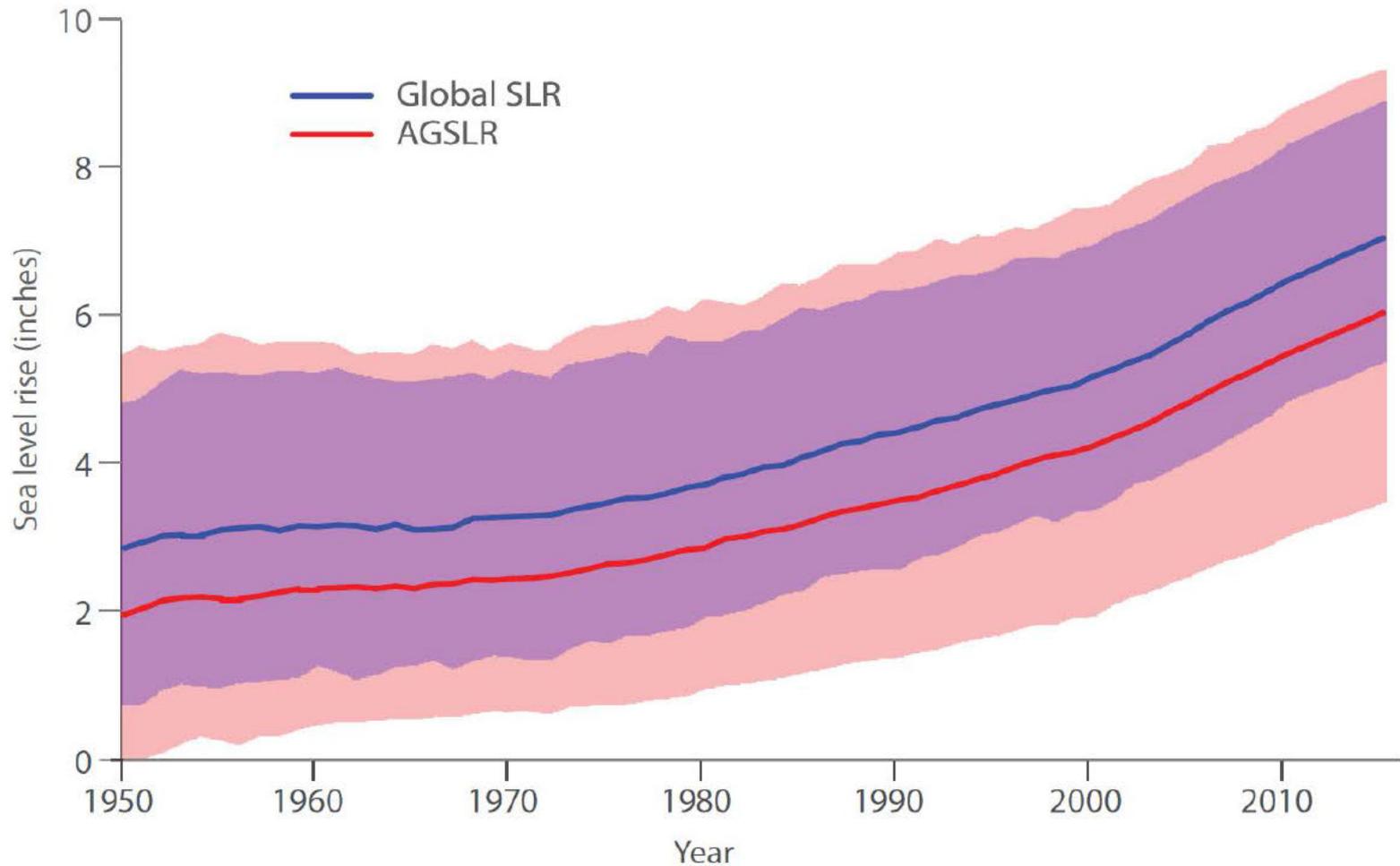
Involvement of sophisticated environmental tort lawyers who know how to litigate against deep-pocketed defendants

# RESPONSIBLE EMITTERS

28 US-Tied Entities  
=  
25% Global CO2  
Emissions 1965-  
2015



**Figure 1.** Estimates of total (black) and anthropogenic global sea level rise (AGSLR, in red) since 1900; shaded areas show confidence intervals. Total global sea level rise estimates from Hay et al. (2015) and anthropogenic fraction estimates from Kopp et al. (2016); time series extended through 2015 as described in text.



Source: Strauss, Kopp et al., "Unnatural Coast Floods: Sea level rise and the human fingerprint on U.S. floods since 1950" (2016)

“Significant temperature changes are almost certain to occur by the year 2000 and these could bring about climatic change .... If the Earth’s temperature increases significantly, a number of events might be expected to occur including the melting of the Antarctic ice cap, **a rise in sea levels**, warming of the oceans and an increase in photosynthesis.”

**“It is clear that we are unsure as to what our long-lived pollutants are doing to our environment; however, there seems to be no doubt that the potential damage to our environment could be severe.”**

**1968** SRI Report for API



“Once the effects are measurable, they might not be reversible, and little could be done to correct the situation in the short term.”

Exxon report, 1982

“Man has a window of 5 to 10 years before the need for hard decisions regarding changes in energy strategies might be critical.”

Presentation for Exxon’s Corporation Management Committee, 1978



**“As many of the world’s major oil companies — including Exxon, Mobil and Shell — joined a multimillion-dollar Industry effort to stave off new regulations to address climate change, they were quietly safeguarding billion-dollar Infrastructure projects from rising sea levels, warming temperatures and increasing storm severity.”**

UCLA (18-5367 and 18-5666) 00246

**(LA Times Dec. 31, 2015)**

**From:** [Hawkins, Marisa](#)  
**To:** [PFrumhoff@ucsusa.org](mailto:PFrumhoff@ucsusa.org)  
**Cc:** [Baldrige, Robert](#); [Donmez, Ayse](#)  
**Subject:** Courtesy Notification Re California Public Records Request at UCLA (18-5367 and 18-5666)  
**Date:** Thursday, January 24, 2019 3:44:43 PM  
**Attachments:** [CEI BATCH 4 - MARKUP \(18-5367 and 18-5666\) - Frumhoff Notification.pdf](#)

---

Dear Dr. Frumhoff,

My name is Marisa Hawkins and I am a Public Records Analyst at UCLA Information Practices. Our office has received two requests for documents under the California Public Records Act (CPRA) from Christopher Horner of the Competitive Enterprise Institute (CEI). These requests seek various emails of Ann Carlson and Cara Horowitz.

Our office is in the process of responding to these public records requests, and among the responsive documents we have collected from Professors Carlson and Horowitz are a number of PowerPoint slides that originated with you; they are attached herein.

If you object to the release of the attached set of slides, I would greatly appreciate it if you could let me know as soon as possible, as we plan to produce responsive records to CEI within the next week.

Please do not hesitate to contact me if you have any questions.

Best regards,

**Marisa Hawkins**

Senior Public Records Analyst  
UCLA Information Practices  
(310) 206-4159  
[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)



California:  
*Oakland*  
*San Francisco*  
*Santa Cruz*  
*Imperial Beach*  
  
*San Mateo Cty*  
*Santa Cruz Cty*  
*Marin Cty*



New York City



Germany



Peru



Philippines



*Lake Oroville - July 20, 2011*



*Lake Oroville - July 20, 2015*

00249



**\$2.7 Billion**

*Lake Oroville - July 20, 2011*



*Lake Oroville - July 20, 2015*

00250

# Sea Level Rise Added \$2 Billion to Sandy's Toll in NY City



UCLA (18-5367 and 18-5666) 00251

Source: Kulp et al 2014



When will climate polluters  
pay their fair share?

**WhoPaysForHarvey.com**

PAID FOR BY CENTER FOR CLIMATE INTEGRITY AND PUBLIC CITIZEN

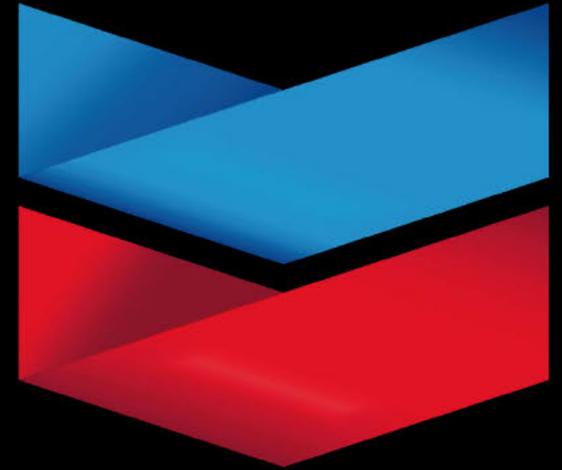


CLEARCHANNEL

001024

**Peabody**  
ENERGY

**Chevron**



**ExxonMobil**

ارامكو السعودية  
Saudi Aramco



“common but differentiated  
responsibilities” among nations

UNFCCC 1992

# ~1980 Oil Industry Knew about Harm

The American Petroleum Institute together with the nation's largest oil companies ran a task force to monitor and share climate research between 1979 and 1983 — N. Banerjee Dec 22,

2015 Inside Climate News



The ExxonMobil logo, consisting of the word "Exxon" in a red, stylized font with a slanted 'x' and "Mobil" in a red, sans-serif font, all contained within a white rectangular box.



measurement will be taken at one or more as yet to be determined locations as the plan is implemented.

### Victory Will Be Achieved When

- Average citizens "understand" (recognize) uncertainties in climate science; recognition of uncertainties becomes part of the "conventional wisdom"
- Media "understands" (recognizes) uncertainties in climate science.
- Media coverage reflects balance on climate science and recognition of the validity of viewpoints that challenge the current "conventional wisdom"
- Industry senior leadership understands uncertainties in climate science, making them stronger ambassadors to those who shape climate policy
- Those promoting the Kyoto treaty on the basis of extant science appear to be out of touch with reality.

### Current Reality

Unless "climate change" becomes a non-issue, meaning that the Kyoto proposal is defeated and there are no further initiatives to thwart the threat of climate change, there may be no moment when we can declare victory for our efforts. It will be necessary to establish measurements for the science effort to track progress toward achieving the goal and strategic success.

# Exxon's Campaign in Black and White

As part of Exxon's campaign to sow doubt about global warming, the oil giant ran a series of newspaper advertisements, some of which highlighted the uncertainty of climate science.

July 25, 1996

## With climate change, what we don't know can hurt us

It has been said climate is what we expect; weather is what we get. Weather is capricious and chaotic. By contrast, climate in the 10,000 years since the last ice age has been assumed to be quite stable and serene, an assumption that is crumbling in the face of ever more accurate climate measurements. It now appears that the last ice age in this period has actually been quite volatile, changing Earth in ways that may dwarf the impact of human activity and complicate predicting climate trends. Nevertheless, the chance

of a major, sudden climate change is not negligible. There is great pressure to assign responsibility for the stabilization and reduction of emissions, along with the cost, almost entirely to the industrialized world. While the developing world would be spared the initial burden, such a decision would penalize all nations in the long run. Imposing controls only on the industrialized world would likely cause what economists call "carbon leakage"—the transfer of energy-intensive activities to less-regulated countries, where they would offset the benefits of emission reductions.

## Dec. 4, 1997 Climate change: a degree of uncertainty



The debate on climate change has been long, complex and intense. Governments, corporations, scientists, economists and private citizens have all helped to shape the debate. Today, we respectfully submit our message to the officials who are gathered in Kyoto to consider actions to reduce emissions of carbon dioxide and other greenhouse gases.

Most share the widespread concern about the potential impact of these emissions on the globe's climate. At the same time, we are concerned that mandated emission cutbacks will produce grave economic consequences for all nations.

Fossil fuels dominate the world's energy picture today, for at least several decades. They will continue to be the major source of the world's energy for many years to come.

The major concern is that the use of fossil fuels will contribute to global warming, which in turn will lead to a warmer, more volatile climate.

■ Governments should encourage and encourage cooperative research on climate change while harnessing free markets and voluntary measures to deliver optimum emission reductions while preserving sustained economic growth.

■ To address the scientific uncertainty, governments, universities and industry should form global research partnerships to fill the knowledge gap, with the goal of achieving a consensus view on critical issues well in a defined time frame.

■ During the fact-finding period, governments should encourage and promote voluntary actions by industry and citizens that reduce emissions and use energy wisely. Government can do much to raise public awareness of the importance of energy conservation.

■ Kyoto is already participating in such efforts. Through cooperative research, we are conducting research on technologies that provide

## Do No Harm

As an organization as your local weather forecast, ideas on the climate change debate range from seeing the issue as serious or trivial and what to do about it.

Some in the debate believe they can predict changes in climate decades from now. According to the latest science, however, it is not possible to predict with any confidence what the world's weather will be like in 50 years or more.

Though we do not know the exact date of a major climate change, we do know that there is a real possibility that it will occur. It is our responsibility to prepare ourselves for the possibility of a major climate change by conserving energy and reducing our carbon footprint.

Though it is not clear when a major climate change will occur, we do know that there is a real possibility that it will occur. It is our responsibility to prepare ourselves for the possibility of a major climate change by conserving energy and reducing our carbon footprint.

In the United States, the Department of Energy has indicated that the Kyoto Protocol would require a 50 percent reduction in emissions of carbon dioxide and other greenhouse gases by the year 2012. Such a reduction would have a significant impact on the economy and on the lives of all Americans.

March 16, 2000

## ExxonMobil

Research should address policy needs

## Directions for climate research

Climate science is experiencing rapid development. Relatively significant research budgets and resources are being directed to the study of climate change. Progress has been made in understanding the basic science of climate change and the role of greenhouse gases in global warming. However, there are still many areas where research is needed to better understand the complex system of climate change and its impact on the environment and human health.

Research should address policy needs

## Unsettled Science

March 23, 2000

Knowing that weather forecasts are clearly for a few days at best, we should recognize the enormous challenge long forecasts (seeing to predict) climate change and its impact over the next century. It is the uncertainty of climate science that is the real problem. It is not the uncertainty of climate science that is the real problem. It is not the uncertainty of climate science that is the real problem.

A recent report from the National Research Council (NRC) makes a strong case for increasing research on climate change. The report calls for a major increase in research on climate change, particularly in the areas of basic science, modeling, and observation.

The NRC report calls for a major increase in research on climate change, particularly in the areas of basic science, modeling, and observation.

Some use the fact that the future is always changing and that we cannot predict it to argue that we should not worry about it. However, the fact that the future is always changing and that we cannot predict it does not mean that we should not worry about it.

Geological evidence indicates that climate and sea level have changed many times in the past. This evidence suggests that climate change is a natural phenomenon and that we should not be surprised if it occurs again.

It is not clear when a major climate change will occur, but we do know that there is a real possibility that it will occur. It is our responsibility to prepare ourselves for the possibility of a major climate change by conserving energy and reducing our carbon footprint.

July 18, 1996

## Less heat, more light on climate change

No longer just talking about the weather, many governments are grappling with the possibility that human activities are enhancing nature's greenhouse effect, which might trigger significant changes in the global climate. Under the United Nations Framework Convention on Climate Change, countries are pressing for the stabilization, and eventual reduction, of man-made greenhouse gas emissions. Nations are gathered in Kyoto for the Second Conference of Parties meeting. Negotiations will continue into next year and could result in legally binding agreements and common measures to reduce greenhouse gas emissions.

The effect of CO2. Worldwide, the burning of fossil fuels coupled with massive deforestation adds some 20 billion metric tons of CO2 annually. About half these emissions end up in the atmosphere. The rest is believed to be absorbed by increased plant growth and the oceans. We know little about this non-atmospheric absorption, which conditions decision-makers. For example, how might plant growth and absorption by the ocean change with higher global temperatures? Moreover, greenhouse gas emissions, which have a warming effect, are offset by another pollution product, aerosols—which leads to cooling.

## When facts don't square with the theory, throw out the facts

Aug. 14, 1997

That seems to characterize the administration's attitude on two of its own studies which show that global warming would slash a 500 million jobs. The administration—creating jobs close to the job—has proposed to pay the results of the emission reduction plan in Kyoto. The table set for the climate change meeting in Kyoto, later this year, is 500 million jobs. The table set for the climate change meeting in Kyoto, later this year, is 500 million jobs. The table set for the climate change meeting in Kyoto, later this year, is 500 million jobs.

When facts don't square with the theory, throw out the facts. The administration—creating jobs close to the job—has proposed to pay the results of the emission reduction plan in Kyoto. The table set for the climate change meeting in Kyoto, later this year, is 500 million jobs. The table set for the climate change meeting in Kyoto, later this year, is 500 million jobs.

## Research should address policy needs

Research should address policy needs. The administration—creating jobs close to the job—has proposed to pay the results of the emission reduction plan in Kyoto. The table set for the climate change meeting in Kyoto, later this year, is 500 million jobs. The table set for the climate change meeting in Kyoto, later this year, is 500 million jobs.

Research should address policy needs. The administration—creating jobs close to the job—has proposed to pay the results of the emission reduction plan in Kyoto. The table set for the climate change meeting in Kyoto, later this year, is 500 million jobs. The table set for the climate change meeting in Kyoto, later this year, is 500 million jobs.

inside climate news



# What Exxon knew about the Earth's melting Arctic

By SARA JERVING, KATIE JENNINGS, MASAKO MELISSA HIRSCH AND SUSANNE RUST

OCT. 9, 2015

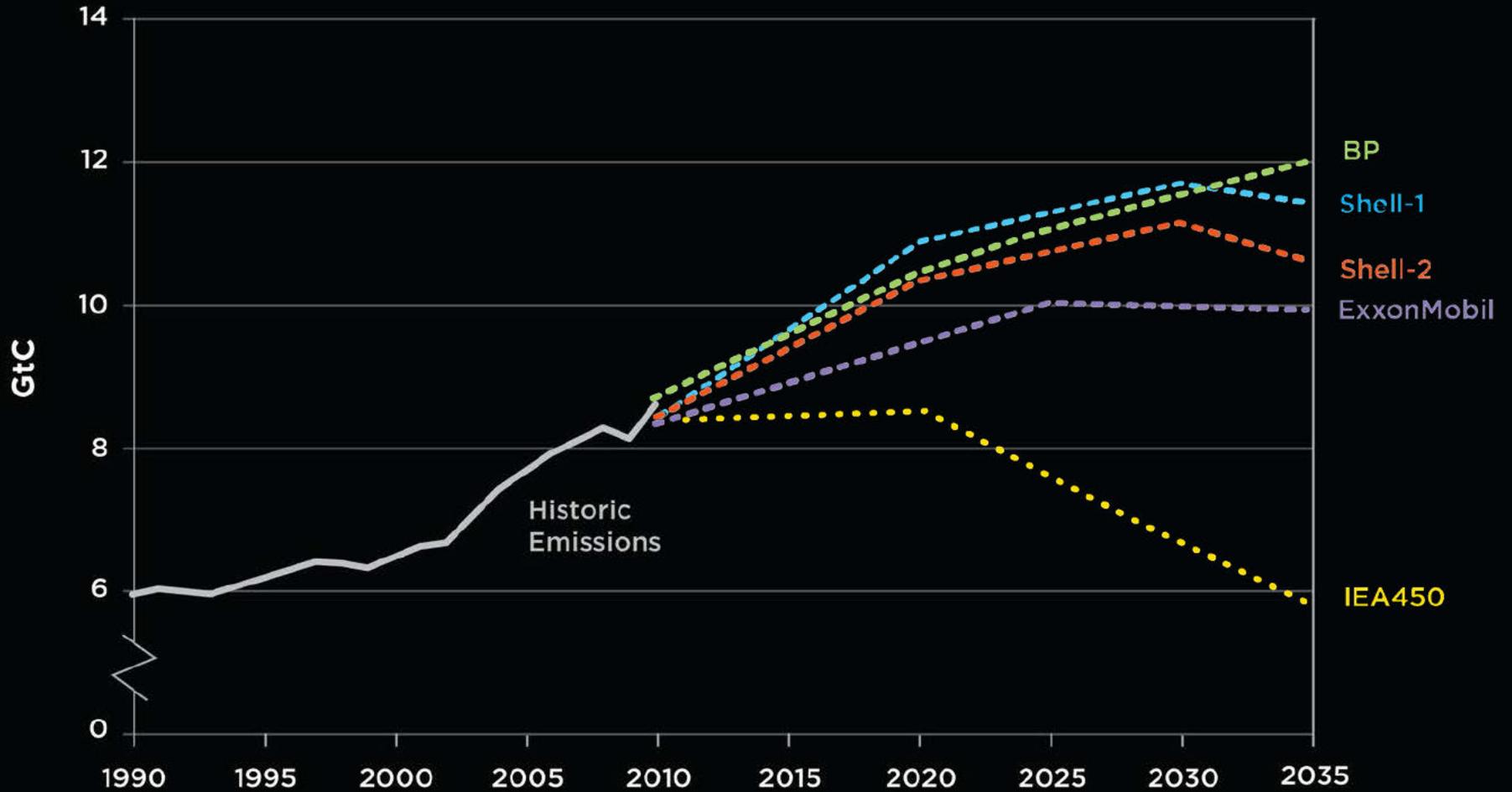
<http://graphics.latimes.com/exxon-arctic/>



May 20<sup>th</sup> 1997  
Stanford University

*...[T]here is now an effective consensus among the world's leading scientists...that there is a discernible human influence on the climate and a link between the concentration of carbon dioxide and the increase in temperature...We have a responsibility to act [and] BP accepts that responsibility..."*

# Carbon Emissions from Fossil Fuels



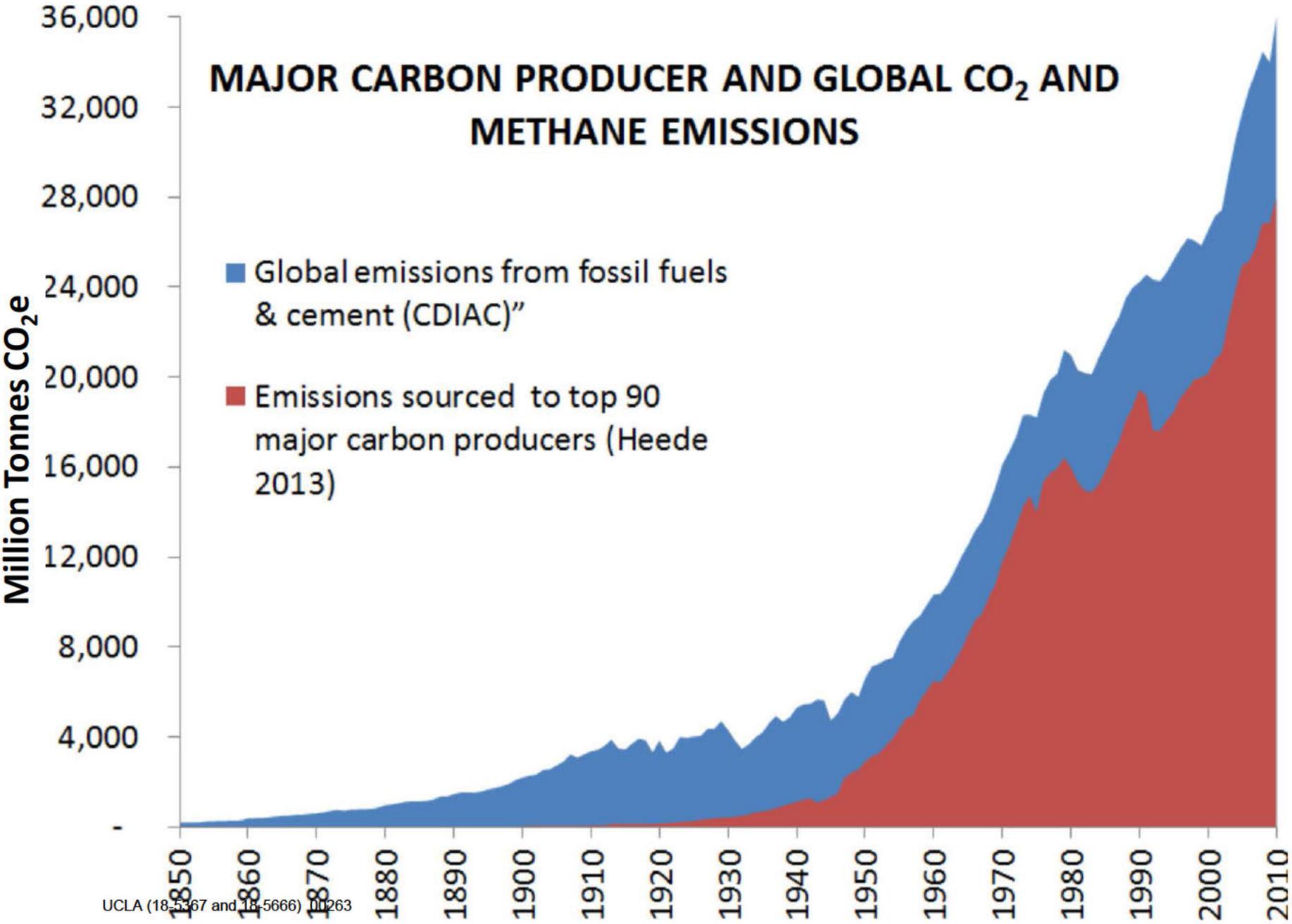
# The rise in global atmospheric CO<sub>2</sub>, surface temperature and sea level from emissions traced to major carbon producers

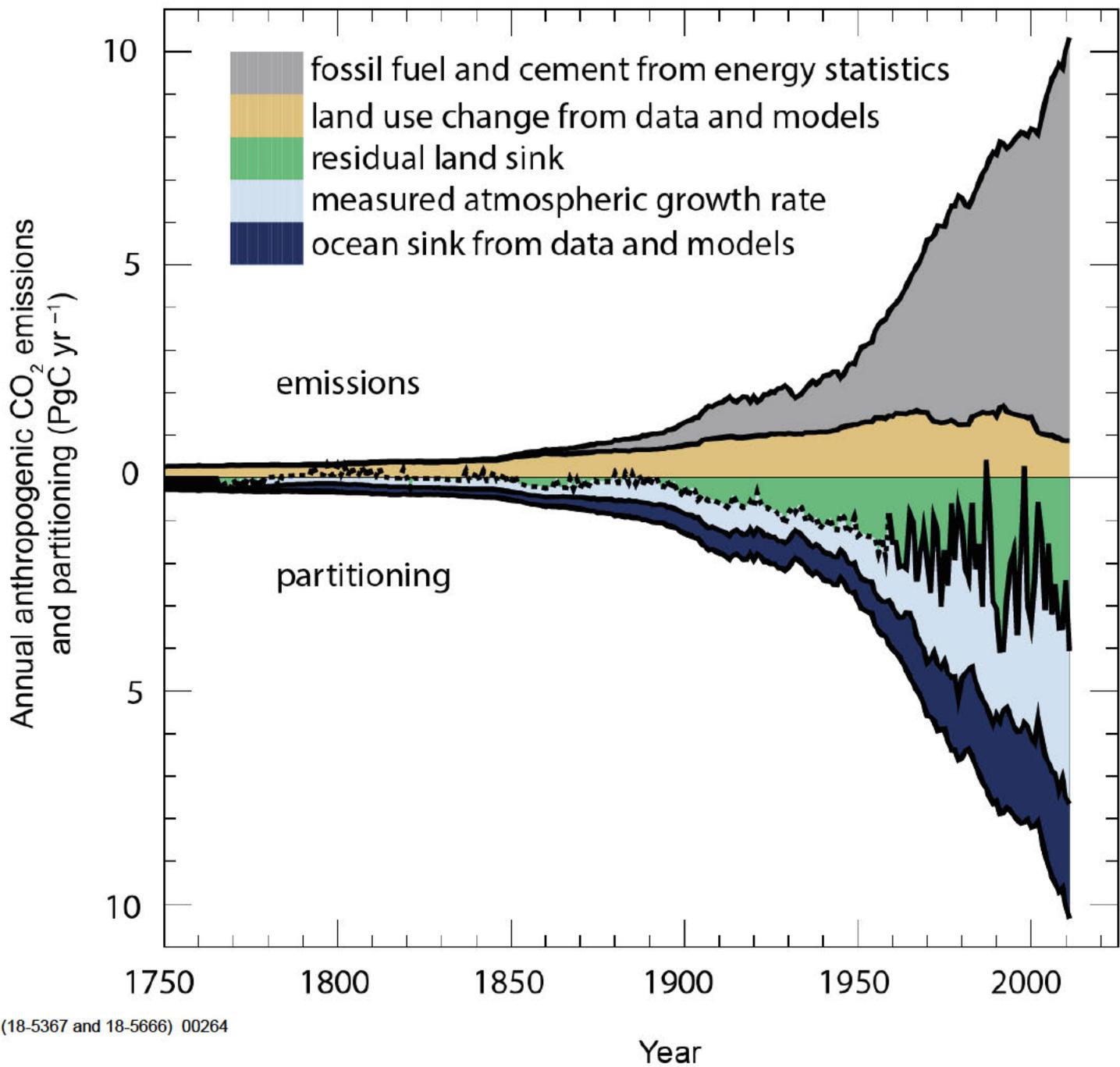


Source: NOAA

Ekwurzel, B., J. Boneham, M.W. Dalton, R. Heede, R.J. Mera, M.R. Allen and P.C. Frumhoff. 2017 *Climatic Change* [bit.ly/GAT\\_SLR](https://bit.ly/GAT_SLR)

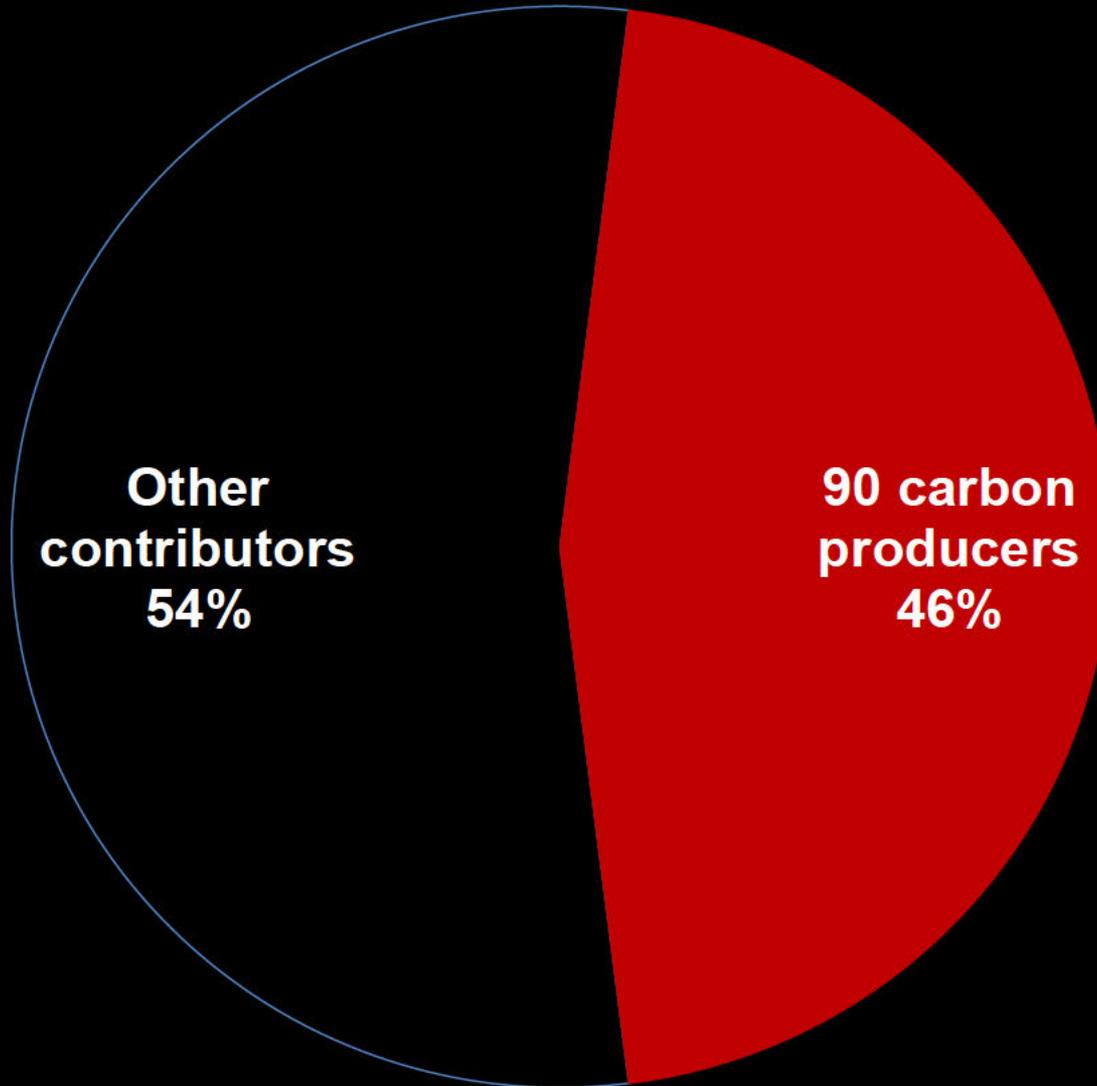
# MAJOR CARBON PRODUCER AND GLOBAL CO<sub>2</sub> AND METHANE EMISSIONS



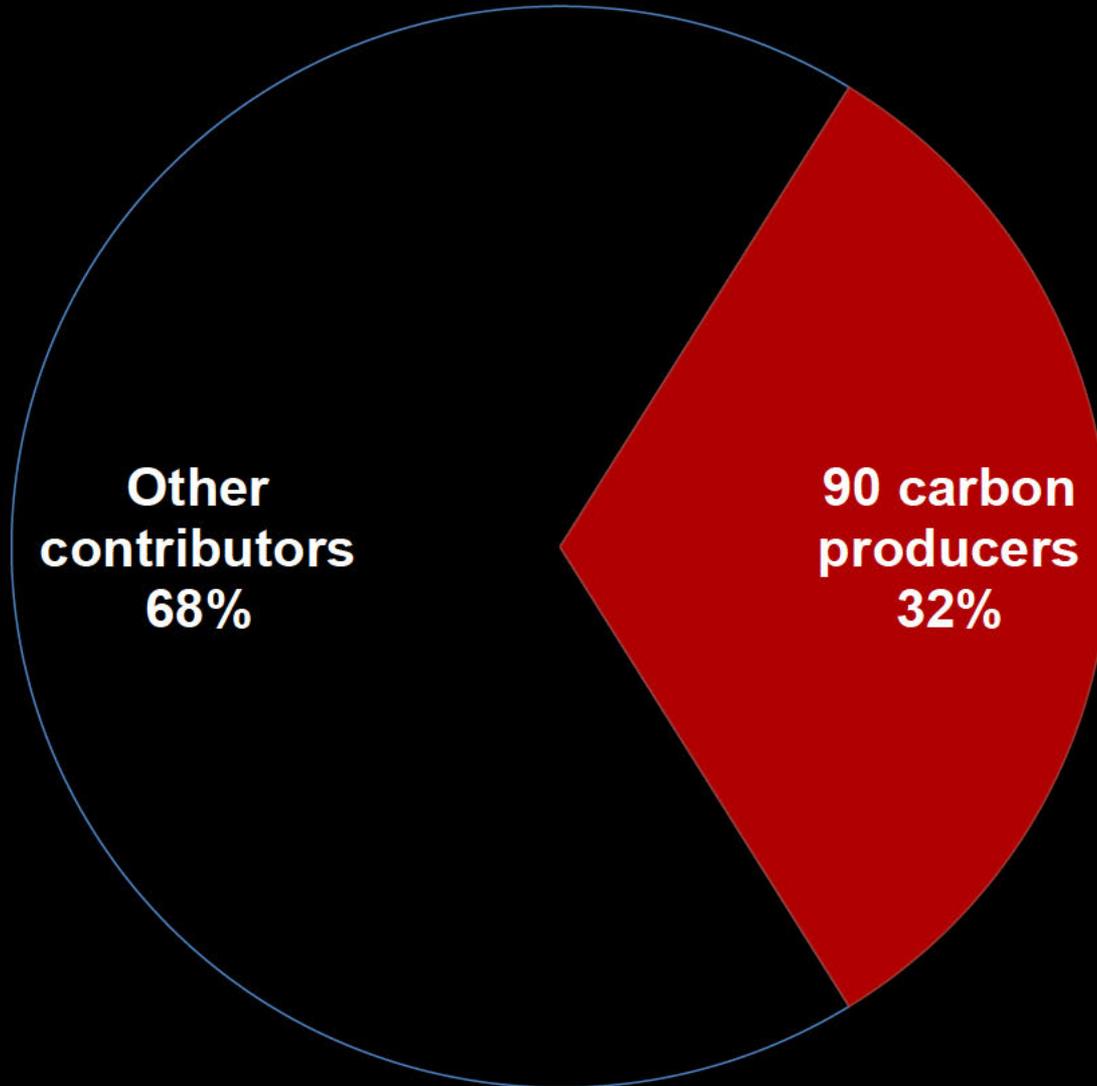


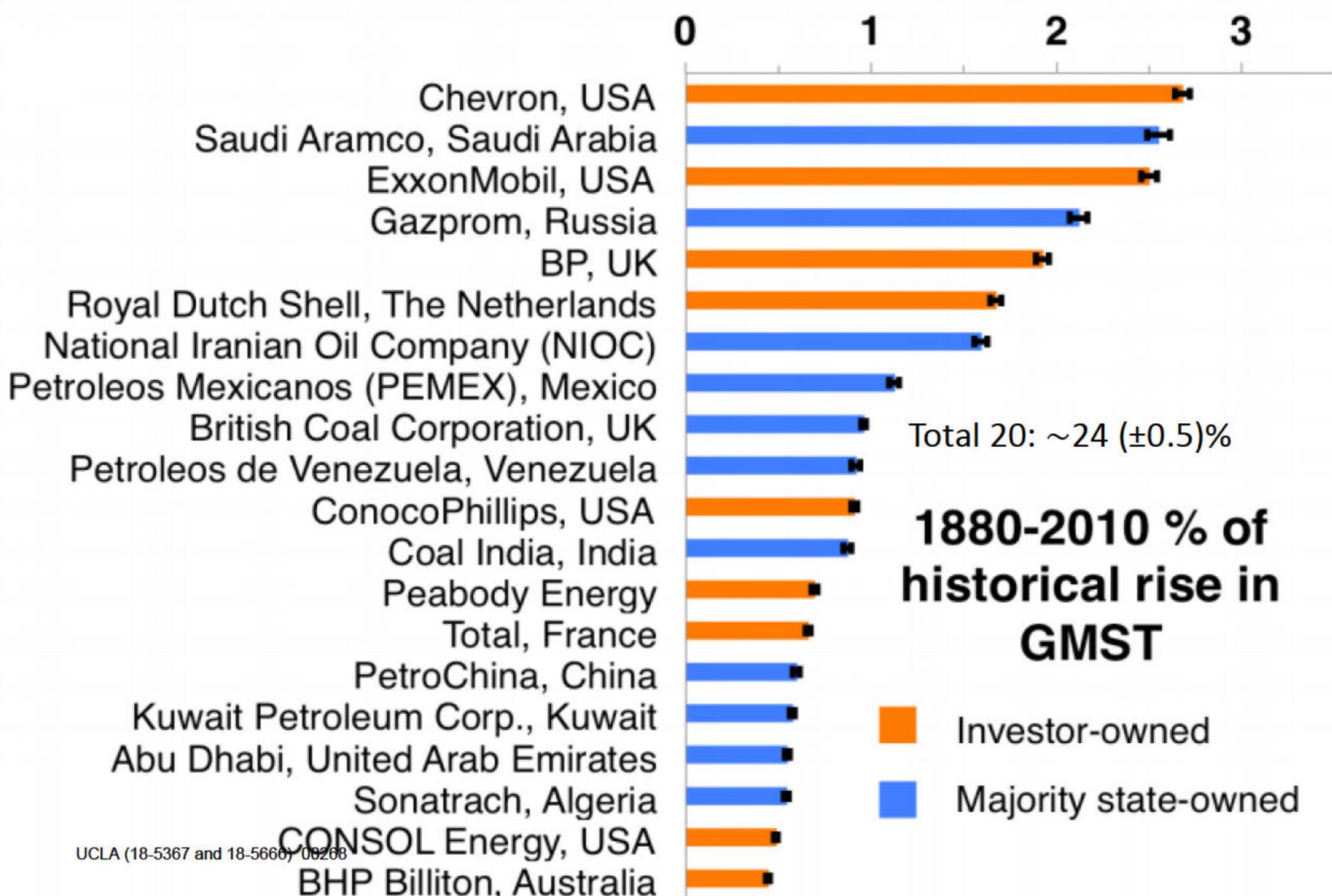
- Incorporated Heede data on annual emissions into a well-established carbon-cycle climate model
- Quantified differences in atm CO<sub>2</sub>, global surface temp, and sea level w/ & w/out emissions from carbon producers
- Compared results for emissions 1880-2010 and 1980-2010

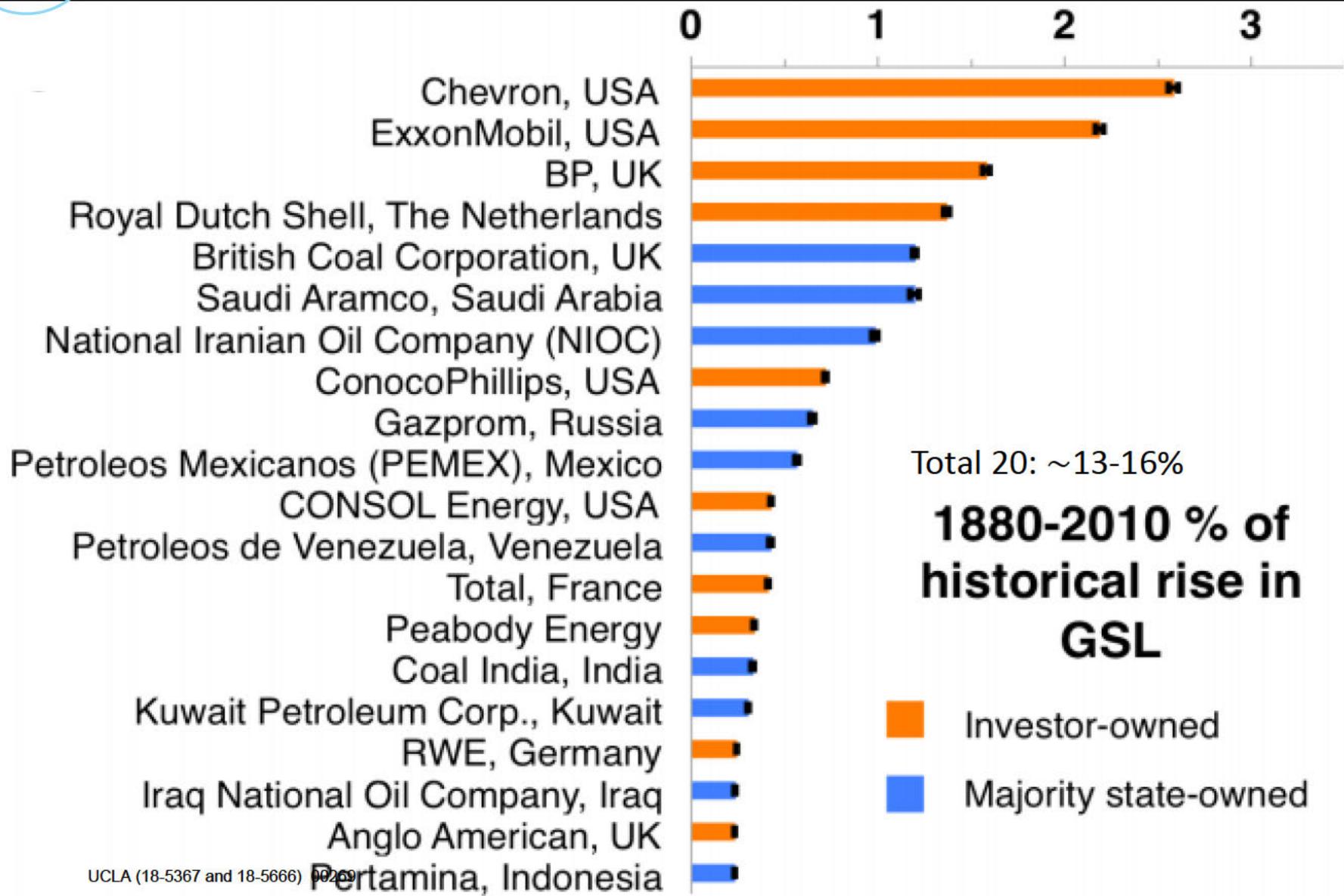
**1880-2010 global temperature increase  
from 1880-2010 emissions**



**1880-2010 global temperature increase  
from 1980-2010 emissions**









**COURT PERSONNEL ONLY**  
Beyond This Point

A silhouette of the Statue of Liberty stands on its pedestal, set against a dramatic sunset sky with streaks of orange and yellow light. The water of the harbor is visible in the foreground.

{ Thank You

[ Union of  
Concerned Scientists

**From:** [Vic Sher](#)  
**To:** [Hawkins, Marisa](#)  
**Cc:** [Baldrige, Robert](#); [Donmez, Ayse](#)  
**Subject:** RE: Courtesy Notification Re California Public Records Request at UCLA (18-5367 and 18-5666)  
**Date:** Thursday, January 24, 2019 4:22:10 PM

---

Will you be attributing the documents to me, or simply releasing them as they are? If the latter, no problem.

**Vic Sher**

Partner

**SHER EDLING LLP**

100 Montgomery St., Ste. 1410  
San Francisco CA 94104  
(628) 231-2510 | [sheredling.com](http://sheredling.com)

---

**From:** Hawkins, Marisa <mhawkins@finance.ucla.edu>  
**Sent:** Thursday, January 24, 2019 3:42 PM  
**To:** Vic Sher <vic@sheredling.com>  
**Cc:** Baldrige, Robert <rbaldrige@finance.ucla.edu>; Donmez, Ayse <adonmez@finance.ucla.edu>  
**Subject:** Courtesy Notification Re California Public Records Request at UCLA (18-5367 and 18-5666)

Dear Mr. Sher,

My name is Marisa Hawkins and I am a Public Records Analyst at UCLA Information Practices. Our office has received two requests for documents under the California Public Records Act (CPRA) from Christopher Horner of the Competitive Enterprise Institute (CEI). These requests seek various emails of Ann Carlson and Cara Horowitz.

Our office is in the process of responding to these public records requests, and among the responsive documents we have collected from Professors Carlson and Horowitz are several PowerPoint slides that originated with you. Professor Carlson has walked me through the attached document and believes that pages 3 and 4 come from a deck of your slides, as do the quotes on pages 5, 6, and 7.

If you object to the release of pages 3-7 of the attached set of slides, I would greatly appreciate it if you could let me know as soon as possible, as we plan to produce responsive records to CEI within the next week.

Please do not hesitate to contact me if you have any questions.

Best regards,

**Marisa Hawkins**

Senior Public Records Analyst  
UCLA Information Practices

(310) 206-4159

[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

**From:** [Peter Frumhoff](#)  
**To:** [Hawkins, Marisa](#)  
**Cc:** [Baldrige, Robert](#); [Donmez, Ayse](#)  
**Subject:** Re: Courtesy Notification Re California Public Records Request at UCLA (18-5367 and 18-5666)  
**Date:** Thursday, January 24, 2019 5:24:53 PM

---

Dear Marisa Hawkins,

I greatly appreciate your reaching out on this matter. I have no objections to your releasing the slides.

All best regards

Peter Frumhoff

Get [Outlook for iOS](#)

---

**From:** Hawkins, Marisa <mhawkins@finance.ucla.edu>  
**Sent:** Thursday, January 24, 2019 6:45 PM  
**To:** Peter Frumhoff  
**Cc:** Baldrige, Robert; Donmez, Ayse  
**Subject:** Courtesy Notification Re California Public Records Request at UCLA (18-5367 and 18-5666)

Dear Dr. Frumhoff,

My name is Marisa Hawkins and I am a Public Records Analyst at UCLA Information Practices. Our office has received two requests for documents under the California Public Records Act (CPRA) from Christopher Horner of the Competitive Enterprise Institute (CEI). These requests seek various emails of Ann Carlson and Cara Horowitz.

Our office is in the process of responding to these public records requests, and among the responsive documents we have collected from Professors Carlson and Horowitz are a number of PowerPoint slides that originated with you; they are attached herein.

If you object to the release of the attached set of slides, I would greatly appreciate it if you could let me know as soon as possible, as we plan to produce responsive records to CEI within the next week.

Please do not hesitate to contact me if you have any questions.

Best regards,

**Marisa Hawkins**

Senior Public Records Analyst

UCLA Information Practices

(310) 206-4159

[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

**From:** [Hawkins, Marisa](#)  
**To:** [SMarjanac@clientearth.org](mailto:SMarjanac@clientearth.org)  
**Cc:** [Baldrige, Robert](#); [Donmez, Ayse](#)  
**Subject:** Courtesy Notification (18-5666) - Sophie Marjanac  
**Date:** Wednesday, March 27, 2019 11:01:11 AM  
**Attachments:** [Courtesy Notification \(18-5666\) - Sophie Marjanac.pdf](#)  
[Request \(18-5666\).PDF](#)  
[MARJANAC PPT SLIDES \(18-5666\).pdf](#)

---

Dear Ms. Marjanac,

Please find attached a Courtesy Notification Letter regarding the release of public records as well as the records that UCLA will release in response to a California Public Records Act request.

Please feel free to contact me via phone or email if you have any questions or concerns.

Best Regards,

**Marisa Hawkins**

Senior Public Records Analyst

UCLA Information Practices

(310) 206-4159

[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)



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

VIA EMAIL

March 27, 2019

Sophie Marjanac  
ClientEarth  
Email: [SMarjanac@clientearth.org](mailto:SMarjanac@clientearth.org)

**RE: Notification of Release to Public – (PRR 18-5666)**

Dear Ms. Marjanac:

UCLA received a request pursuant to the California Public Records Act, herein enclosed. In response, UCLA plans to release a number of documents, including the attached PowerPoint slides, no earlier than April 5, 2019. Notification of subsequent releases, if any, may not be provided.

This is a courtesy notification and requires no action on your part. Should you have any questions, please contact me at (310) 794-8741 or via email at [mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu) and reference the PRR number found above in the subject line.

Sincerely,

A handwritten signature in cursive script that reads "Marisa H. Hawkins".

**Marisa Hawkins**

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

Attachment

**From:** [Chris Horner](#)  
**To:** [records@ucla.edu](mailto:records@ucla.edu)  
**Subject:** REQUEST UNDER CALIFORNIA'S PUBLIC RECORDS ACT -- certain Horowitz, Carlson correspondence  
**Date:** Monday, May 21, 2018 2:53:36 PM  
**Attachments:** [CEI UCLA Horowitz Carlson UCS et al PRA request.pdf](#)

---

Please see the attached.

1310 L Street, NW, 7th Floor  
Washington, DC 20005  
cei.org

202 331 1010 *main*  
202 331 0640 *fax*



## REQUEST UNDER CALIFORNIA'S PUBLIC RECORDS ACT

May 21, 2018

Records Management & Information Practices  
10920 Wilshire Boulevard  
Suite 530  
Los Angeles, CA 90024-6541

**BY ELECTRONIC MAIL** — [records@ucla.edu](mailto:records@ucla.edu)

UCLA Records Management Officer,

On behalf of the Competitive Enterprise Institute (CEI), a non-profit public policy institute in Washington, DC and pursuant to the California Government Code §§ 6250 *et. seq.*, please provide us within 10 business days copies of all correspondence and its accompanying information<sup>1</sup>, including also any attachments, that were sent by, sent to (including copying, whether as cc: or bcc:) or otherwise were received or are possessed by UCLA School of Law's **Cara Horowitz**, and/or **Ann Carlson**, dated from **May 1, 2016** through the date you process this request, inclusive, which are also:

- a) to or from Shaun Goho, *and/or*
- b) which use any of the following terms, *anywhere* in the correspondence be it the to, from, cc, bcc, and/or Subject fields and/or body of the email or attachments: i) Harvard, ii) Pawa, iii) Eubanks, iv) McKibben, v) Kimmell, vi) "Union of Concerned Scientists", and/or vii) @ucsusa.org. None of these terms are case sensitive.

---

<sup>1</sup> This includes public records, and associated public information, see discussion of Data Delivery Standards, *infra*.

1310 L Street, NW, 7th Floor  
Washington, DC 20005  
cei.org

202 331 1010 *main*  
202 331 0640 *fax*



Public records show that Professors Horowitz and Carlson are using their positions at your public university to coordinate with certain activists groups in organizing and pursuing law enforcement and civil investigations and litigation against private opponents of a particular political agenda. We seek correspondence and other records illuminating this use of a public university faculty position and resources.

**Please consider as responsive entire email “threads”** containing any information responsive to this request, regardless whether any part of that thread falls outside the cited search parameters.

**We request records on the University’s system**, e.g., its backend logs, not those which survive on a faculty member’s own machine or account.

**We do not demand your Office produce requested information in any particular form, instead we request records in their native form, with specific reference to the U.S. Securities and Exchange Commission Data Delivery Standards.<sup>2</sup>** The covered information we seek is electronic information, this includes electronic *records*, and other public *information*.

To quote the SEC Data Delivery Standards, “Electronic files must be produced in their native format, i.e. the format in which they are ordinarily used and maintained during the normal course of business. For example, an MS Excel file must be produced as an MS Excel file rather than an image of a spreadsheet. *(Note: An Adobe PDF file is not considered a native file unless the document was initially created as a PDF.)* (emphases in original).

---

<sup>2</sup> <https://www.sec.gov/divisions/enforce/datadeliverystandards.pdf>.



In many native-format productions, certain public information remains contained in the record (e.g., metadata). Under the same standards, to ensure production of all information requested, if your production will be de-duplicated it is vital that you 1) preserve any unique metadata associated with the duplicate files, for example, custodian name, and, 2) make that unique metadata part of your production.

Native file productions may be produced without load files. However, native file productions must maintain the integrity of the original meta data, and must be produced as they are maintained in the normal course of business and organized by custodian-named file folders. A separate folder should be provided for each custodian.

In the event that necessity requires your Office to produce a PDF file, due to your normal program for redacting certain information and such that native files cannot be produced as they are maintained in the normal course of business, in order to provide all requested information each PDF file should be produced in separate folders named by the custodian, *and* accompanied by a load file to ensure the requested information appropriate for that discrete record is associated with that record. The required fields and format of the data to be provided within the load file can be found in Addendum A of the above-cited SEC Data Standards. All produced PDFs must be text searchable.

In the context of our experience with responsive agencies taking the effort to physically print, then (often, poorly) scan *electronic* mail into (typically, non-searchable) PDF files, we note that production of electronic records necessitates no such additional time, effort or other

1310 L Street, NW, 7th Floor  
Washington, DC 20005  
cei.org

202 331 1010 *main*  
202 331 0640 *fax*



resources, and no photocopying expense. Any such effort as described is most reasonably viewed as an effort to frustrate the requester's use of the public information.

We understand we owe the office the cost of material, required to satisfy this request. We agree to pay legitimate expenses up to \$150.00. If you estimate costs will exceed that please notify us immediately and break down the expected costs.

The undersigned do not seek the information for a commercial purpose. CEI is organized and recognized by the Internal Revenue Service as a 501(c)3 educational organization. As such, it has no commercial interest possible in these records.

Also, CEI is a media organization, which the federal government has already acknowledged is the case for purposes of the federal FOIA.<sup>3</sup>

As such, we request a waiver of any fees involved, as release of these records is in the public interest and the Office is permitted to and does exercise discretion in waiving or reducing fees on that basis.

The campaign in which Profs. Carlson and Horowitz have involved themselves and the School using, and which they have participated in expressly on the basis of, their UCLA credential<sup>4</sup> is the subject of intense public, media, congressional oversight and now judicial

---

<sup>3</sup> See e.g., Department of the Treasury FOIA Nos. 2012-08-053, 2012-08-054.

<sup>4</sup> See, e.g., <https://law.ucla.edu/news-and-events/4065/2018/1/25/holding-fossil-fuel-companies-liable-for-climate-change-harms-in-california-c--law-science-and-justice---keynote-remarks-by-bill-mckibben/> and <https://blog.ucsusa.org/peter-frumhoff/scientists-state-prosecutors-fossil-fuel-companies-climate-accountability>.

1310 L Street, NW, 7th Floor  
Washington, DC 20005  
cei.org

202 331 1010 *main*  
202 331 0640 *fax*



interest<sup>5</sup> — which is indeed a principal objective of the campaign.<sup>6</sup> It involves third-parties and plainly no relevant privilege with the exception of possible personal contact information if that information is not already posted on the websites of various participating universities, pressure groups and the like. The requested information is of critical importance to the nonprofit policy advocacy groups engaged on these relevant issues, news media covering the issues, and any others concerned with government activities on this critical subject, or as the United States Supreme Court once noted in the context of the federal FOIA, what their government, which under open records laws includes publicly funded academic institutions, is up to.

If you have any questions please do not hesitate to contact me. We look forward to your timely response.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "C. Horner", with a long, sweeping horizontal line extending to the right.

Christopher C. Horner  
Senior Fellow, CEI  
[chris.horner@cei.org](mailto:chris.horner@cei.org)  
202.262.4458

---

<sup>5</sup> See, e.g., John O'Brien, "Exxon Prepares To Sue California Cities, Says They Contradict Themselves On Climate Change", *Forbes*, January 8, 2018, <https://www.forbes.com/sites/legalnewsline/2018/01/08/exxon-prepares-to-sue-california-cities-say-they-contradict-themselves-on-climate-change/amp/>; Andrew Scurria, "California Municipalities' Debt Disclosures Contrast With Climate Warnings", *Wall Street Journal*, January 8, 2018, <https://www.wsj.com/articles/california-municipalities-debt-disclosures-contrast-with-climate-warnings-1515456551>; see also <https://www.courthousenews.com/wp-content/uploads/2018/01/ExxonDepositions.pdf>.

<sup>6</sup> See, e.g., <http://eidclimate.org/video-attorney-admitted-press-coverage-might-important-winning-climate-lawsuits/>.

# Climate Justice and corporate liability for climate change



Sophie Marjanac  
Lawyer, ClientEarth  
COP23 – Bonn  
17 November 2017

UCLA (18-5367 and 18-5666), 00284

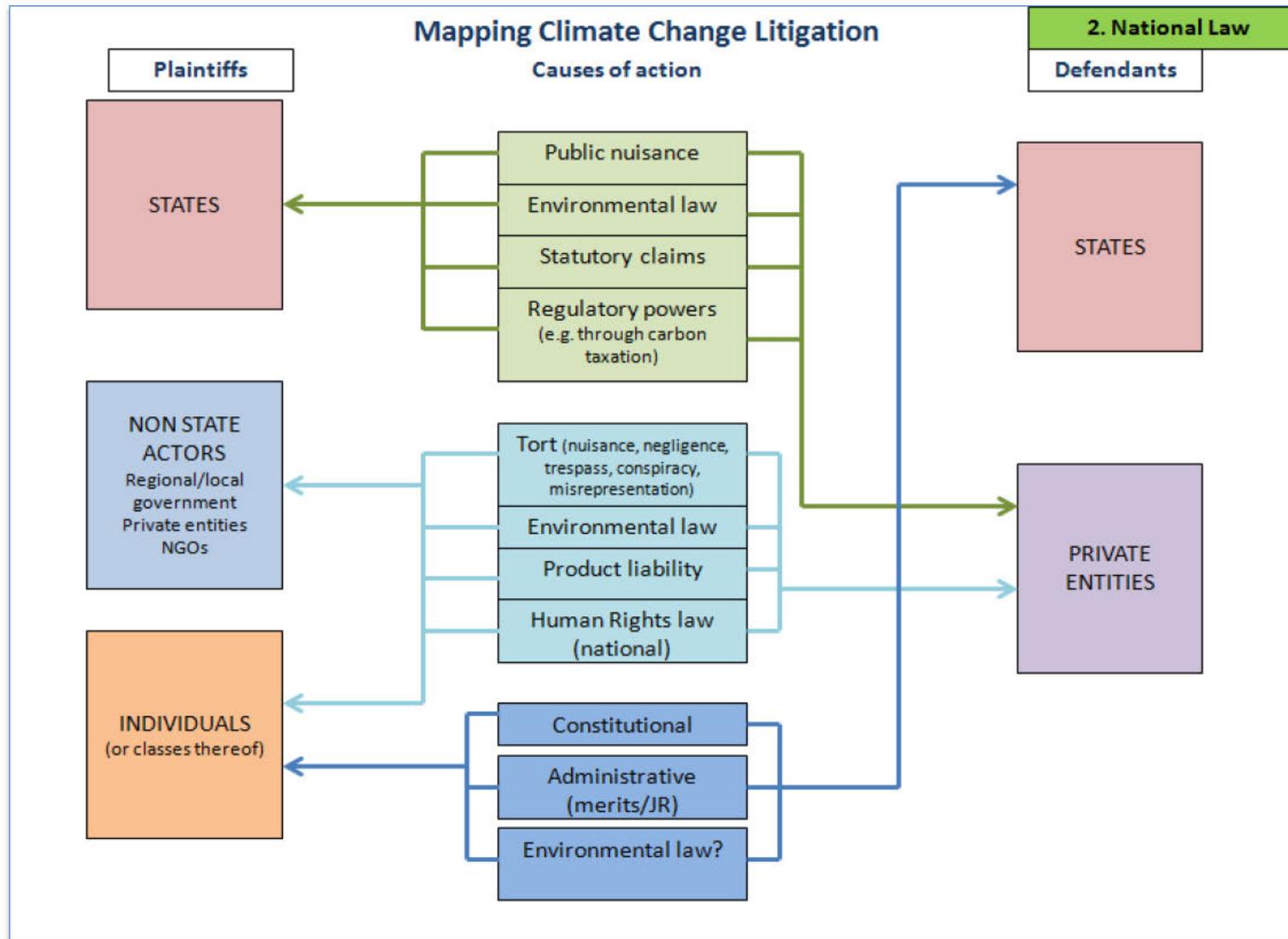


# An introduction to ClientEarth

- ClientEarth is a non-profit environmental law organisation working in Europe, China, Africa
- We use law, science and policy to tackle key environmental challenges
- Conducted detailed analysis of climate change litigation and event attribution science

# Climate change as a legal problem

- Climate change disrupts traditional legal categories:
  - Caused by cumulative emissions of greenhouse gasses since the industrial revolution
  - Multi-jurisdictional
  - Multiple drivers (deforestation/fossil fuels/agriculture)
  - Scientific complexity and uncertainty
  - Utility of conduct (and perceived economic impact of remedy)
  - Severity and scale of impacts



# History of claims against private entities

- ‘First Wave’ of tort litigation in US had limited success
  - Kivalina v ExxonMobil (public nuisance)
  - Comer v Murphy Oil (nuisance, trespass, negligence)
- Standing denied on basis of:
  - Causation (fairly traceable)
  - Justiciability (or political question in US)
  - Pre-emption by Clean Air Act

# Current claims against private entities

- Lliuya v. RWE AG (Germany)
- Conservation Law Foundation v. ExxonMobil (US)
- 2 x Californian suits against carbon majors (US)
- Abrahams v Commonwealth Bank of Australia
- Greenpeace petition to the Philippines Commission on Human Rights inquiry – not litigation

# What has changed?

- Increasing loss and damage
- More and better science:
  - Event attribution science
  - Attribution of emissions to corporate groups
- Evidence of deliberate concealment of risk (#Exxonknew)
- Lack of political action

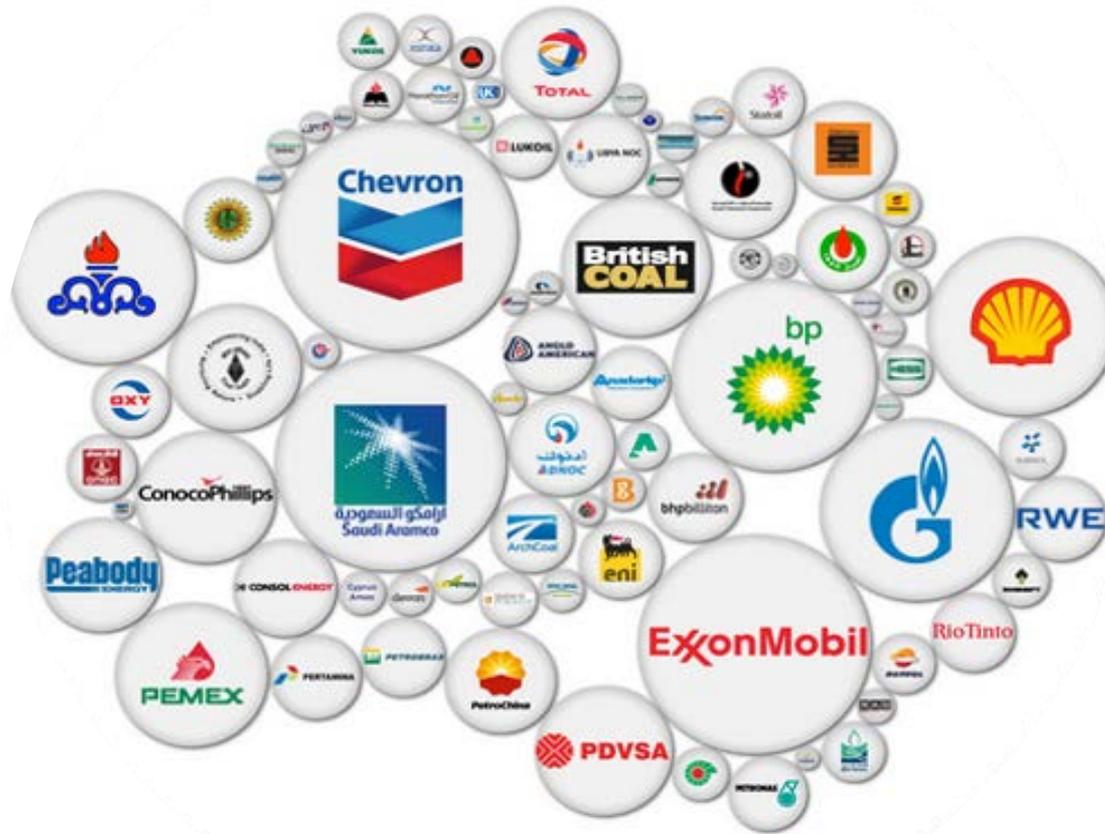
# Urgenda v State of the Netherlands [2015]

*“Due to the severity of the consequences of climate change and the great risk of hazardous climate change occurring – without mitigating measures – the court concludes that the State has a duty of care to take mitigation measures. The circumstances that the Dutch contribution to the present global greenhouse gas emissions is currently small does not affect this”: at [4.83].*

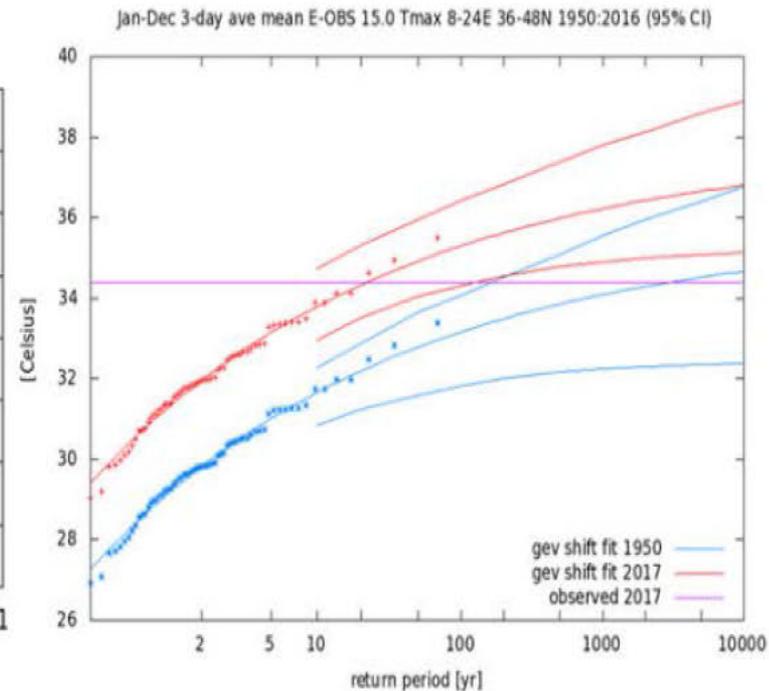
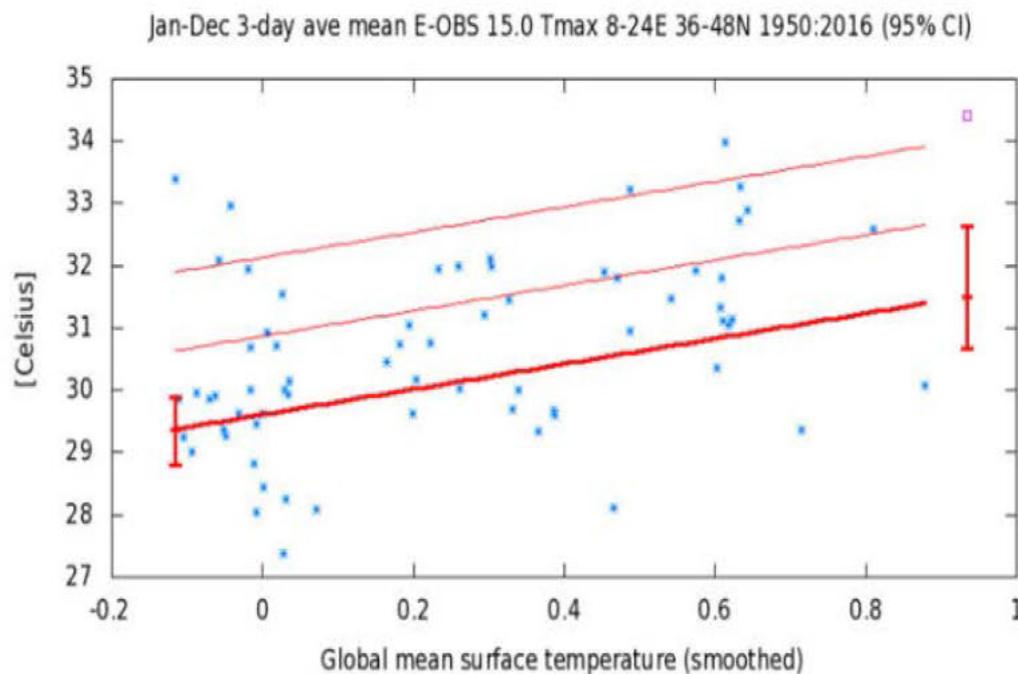
# Thomson v New Zealand [2017]

*[133] ...The courts have not considered the entire subject matter is a “no go” area, whether because the state had entered into international obligations, or because the problem is a global one and one country’s efforts alone cannot prevent harm to that country’s people and their environment, or because the Government’s response involves the weighing of social, economic and political factors, or because of the complexity of the science. The courts have recognised the significance of the issue for the planet and its inhabitants and that those within the court’s jurisdiction are necessarily amongst all who are affected by inadequate efforts to respond to climate change. The various domestic courts have held they have a proper role to play in Government decision making on this topic, while emphasising that there are constitutional limits in how far that role may extend. The IPCC reports provide a factual basis on which decisions can be made. Remedies are fashioned to ensure appropriate action is taken while leaving the policy choices about the content of that action to the appropriate state body.*

# Evidence – Who?



# Evidence – What?



Source: World Weather Attribution, Analysis of Euro-Mediterranean Heat  
Summer 2017 (<https://wwa.climatecentral.org/>)

UCLA (18-5367 and 18-5666) 00294



# The future?



# Thankyou

Sophie Marjanac  
Lawyer, Climate Accountability  
+44 (0) 7437 84 2729  
smarjanac@clientearth.org  
@SMarjanacCE

**From:** [Sophie Marjanac](#)  
**To:** [Hawkins, Marisa](#)  
**Subject:** Automatic reply: Courtesy Notification (18-5666) - Sophie Marjanac  
**Date:** Wednesday, March 27, 2019 11:01:36 AM

---

As I am presently travelling for work my response may be delayed. Thank you for your patience.

Please text +447437842729 on WhatsApp or call my temporary Australian mobile +61498046720 if you need to get in touch.

**From:** [Horowitz, Cara](#)  
**To:** [Carlson, Ann E.](#); [Hawkins, Marisa](#)  
**Cc:** [Baldrige, Robert](#); [Donmez, Ayse](#)  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)  
**Date:** Monday, March 12, 2018 2:47:14 PM

---

Thanks for the call today. As promised, here's information on seeking clarification as to Part II of the request:

-Part II of the request states that "UCLA held a follow-up event [to the April 2016 Harvard Law School workshop], moderated by Ms. Horowitz with the participation of Prof. Carlson", and asks for correspondence relating to this UCLA event that meets certain criteria. UCLA did not hold a follow-up event to the April 2016 Harvard Law School workshop. Does the requester intend to reference a public discussion of recently filed litigation by local governments against fossil fuel companies for climate change harms, held at UCLA's Fowler Museum on January 25, 2018? That event was moderated by Ms. Horowitz, and Professor Carlson participated.

And here's a stab at asking for clarification on the Harvard emails point – Ann can weigh in here if she has other suggestions:

-Part I of the request asks for all correspondence sent, received, or possessed by Cara Horowitz or Ann Carlson dated from March 1, 2016 to April 30, 2016, which includes the term "Harvard." Both faculty members receive an extraordinary number of emails that contain the term "Harvard," including through academic email listservs and from other sources. Most of these emails have no relationship whatsoever to the April 2016 briefing at Harvard referenced in the request, or to litigation or potential litigation against fossil fuel companies for climate change harms. UCLA seeks clarification that it may exclude from its response emails that contain the word "Harvard" but that are not related to the April 2016 briefing at Harvard referenced in the request, or to litigation or potential litigation against fossil fuel companies for climate change harms.

Thanks,  
Cara

---

**From:** Carlson, Ann  
**Sent:** Monday, March 12, 2018 2:01 PM  
**To:** Hawkins, Marisa <mhawkins@finance.ucla.edu>; Horowitz, Cara <HOROWITZ@law.ucla.edu>  
**Cc:** Baldrige, Robert <rbaldrige@finance.ucla.edu>; Donmez, Ayse <adonmez@finance.ucla.edu>  
**Subject:** Re: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

I realize we may not have a conference line? I'm calling in from a cell phone. I can create the conference from my iPhone if you send me the numbers where I should call you

Ann Carlson  
Shirley Shapiro Professor of Environmental Law  
Faculty Co-Director, Emmett Institute on Climate Change and the Environment  
UCLA School of Law

(310) 206-9496

---

**From:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>  
**Sent:** Thursday, March 8, 2018 6:13:14 PM  
**To:** Carlson, Ann; Horowitz, Cara  
**Cc:** Baldrige, Robert; Donmez, Ayse  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Great - if you will be off campus, please just let me know what number we should use to conference you in.

Thanks!  
Marisa

---

**From:** Carlson, Ann [<mailto:carlson@law.ucla.edu>]  
**Sent:** Thursday, March 08, 2018 11:51 AM  
**To:** Horowitz, Cara <[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)>; Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** Re: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Not sure yet so conference line would be best. Thanks!

Ann Carlson  
Shirley Shapiro Professor of Environmental Law  
Faculty Co-Director, Emmett Institute on Climate Change and the Environment  
UCLA School of Law  
(310) 206-9496

---

**From:** Horowitz, Cara  
**Sent:** Thursday, March 8, 2018 11:46:31 AM  
**To:** Hawkins, Marisa; Carlson, Ann  
**Cc:** Baldrige, Robert; Donmez, Ayse  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Conference line is probably best (unless you'll be in the office and able to join me, Ann?). Thank you.

---

**From:** Hawkins, Marisa [<mailto:mhawkins@finance.ucla.edu>]  
**Sent:** Thursday, March 8, 2018 11:43 AM  
**To:** Carlson, Ann <[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)>; Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

That sounds good. We will call at 2pm on Monday – will we need to conference one of you in, or will you be together?

Thanks,

Marisa

---

**From:** Carlson, Ann [<mailto:carlson@law.ucla.edu>]  
**Sent:** Thursday, March 08, 2018 11:39 AM  
**To:** Horowitz, Cara <[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)>; Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** Re: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

It also works for me and phone is fine for me (actually better).

Ann Carlson  
Shirley Shapiro Professor of Environmental Law  
Faculty Co-Director, Emmett Institute on Climate Change and the Environment  
UCLA School of Law  
(310) 206-9496

---

**From:** Horowitz, Cara  
**Sent:** Thursday, March 8, 2018 10:28:21 AM  
**To:** Hawkins, Marisa; Carlson, Ann  
**Cc:** Baldrige, Robert; Donmez, Ayse  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Yes for me, thanks. Should we do it by phone?

---

**From:** Hawkins, Marisa [<mailto:mhawkins@finance.ucla.edu>]  
**Sent:** Thursday, March 8, 2018 9:11 AM  
**To:** Carlson, Ann <[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)>; Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Dear Cara and Ann,

Would Monday at 2pm work for you both?

Thanks,  
Marisa

---

**From:** Carlson, Ann [<mailto:carlson@law.ucla.edu>]  
**Sent:** Wednesday, March 07, 2018 12:30 PM  
**To:** Horowitz, Cara <[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)>  
**Cc:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>; Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** Re: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Monday would work for me or Tuesday after 3. Thanks!

On Mar 7, 2018, at 12:21 PM, Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)> wrote:

Thank you, Marisa. Ann and I would like to discuss this request with counsel in your office. Would that be possible? Perhaps sometime early next week?

I am relatively free Monday afternoon (except from 3pm-3:30) and Tuesday afternoon after 1:30.

Thanks,  
Cara

Cara Horowitz  
Andrew Sabin Family Foundation Co-Executive Director  
Emmett Institute on Climate Change and the Environment  
UCLA School of Law  
Ph (310) 206-4033  
[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)  
[www.law.ucla.edu/emmett](http://www.law.ucla.edu/emmett)

---

**From:** Hawkins, Marisa [<mailto:mhawkins@finance.ucla.edu>]  
**Sent:** Thursday, March 1, 2018 12:02 PM  
**To:** Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)>; Carlson, Ann <[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)>  
**Cc:** Baldridge, Robert <[rbaldridge@finance.ucla.edu](mailto:rbaldridge@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Dear Professor Horowitz and Professor Carlson,

My name is Marisa Hawkins and I am a staff member at UCLA Information Practices, working under Robert Baldridge. Mr. Baldridge recommended that I reach out to you because we recently received the attached request under the California Public Records Act (CPRA) from Christopher C. Horner, a Senior Fellow at the Competitive Enterprise Institute.

The request is somewhat involved, so I have summarized it below. Briefly, it is seeking:

1. **Emails to or from Professor Horowitz and/or Professor Carlson, dated March 1, 2016 through April 30, 2016, meeting any of the following criteria:**

- a. **That are to or from Shaun Goho; or**
  - b. **That contain any of the following terms:**
    - i. **Harvard**
    - ii. **Pawa**
    - iii. **Frumhoff**
    - iv. **UCS**
    - v. **Eubanks**
    - vi. **CIEL**
2. **Emails to or from Professor Horowitz and/or Professor Carlson, dated December 1, 2017 through January 31, 2018, meeting any of the following criteria:**
- a. **That relate to an event (date not specified by the requester) at UCLA, which followed up on an April 25, 2016 event at Harvard Law School; or**
  - b. **That contain any of the following terms:**
    - i. **Frumhoff**
    - ii. **McKibbon**
    - iii. **Kimmell**
    - iv. **Union of Concerned Scientists**
    - v. **UCS**
    - vi. **@ucsusa.org**

Would you be able to provide any responsive emails to any or all of the above requests?

Please know that the Office of Legal Affairs (OLA) is already aware of this request and that any responsive records provided will be thoroughly reviewed and vetted with the input of OLA and redacted and/or withheld where possible, pursuant to the legal exemptions to disclosure under CPRA.

For your reference, I have included our guidelines regarding the collection and forwarding of responsive emails. Please feel free to contact me if you have any questions or concerns.

Best regards,

**Marisa Hawkins**  
Senior Public Records Analyst  
UCLA Information Practices  
(310) 206-4159  
[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

**From:** [Hawkins, Marisa](#)  
**To:** [Horowitz, Cara](#); [Carlson, Ann E.](#)  
**Cc:** [Baldrige, Robert](#); [Donmez, Ayse](#)  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)  
**Date:** Tuesday, March 13, 2018 10:45:00 AM

---

Dear Cara and Ann,

Thank you for taking the time to talk yesterday, and for alerting us to the issues that require further clarification from the requester. We have sent a clarification letter to Mr. Horner, incorporating your language below. I will let you know as soon as we hear back from him. In the meantime, it would be very helpful if you could gather any responsive documents that are not affected by the clarification request, so that our office can begin the process of review.

Thanks once again for your help on this matter.

Best,  
Marisa

**Marisa Hawkins**

Senior Public Records Analyst  
UCLA Information Practices  
(310) 206-4159  
[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

---

**From:** Horowitz, Cara [mailto:HOROWITZ@law.ucla.edu]  
**Sent:** Monday, March 12, 2018 2:47 PM  
**To:** Carlson, Ann E. <carlson@law.ucla.edu>; Hawkins, Marisa <mhawkins@finance.ucla.edu>  
**Cc:** Baldrige, Robert <rbaldrige@finance.ucla.edu>; Donmez, Ayse <adonmez@finance.ucla.edu>  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Thanks for the call today. As promised, here's information on seeking clarification as to Part II of the request:

-Part II of the request states that "UCLA held a follow-up event [to the April 2016 Harvard Law School workshop], moderated by Ms. Horowitz with the participation of Prof. Carlson", and asks for correspondence relating to this UCLA event that meets certain criteria. UCLA did not hold a follow-up event to the April 2016 Harvard Law School workshop. Does the requester intend to reference a public discussion of recently filed litigation by local governments against fossil fuel companies for climate change harms, held at UCLA's Fowler Museum on January 25, 2018? That event was moderated by Ms. Horowitz, and Professor Carlson participated.

And here's a stab at asking for clarification on the Harvard emails point – Ann can weigh in here if she has other suggestions:

-Part I of the request asks for all correspondence sent, received, or possessed by Cara Horowitz or

Ann Carlson dated from March 1, 2016 to April 30, 2016, which includes the term "Harvard." Both faculty members receive an extraordinary number of emails that contain the term "Harvard," including through academic email listservs and from other sources. Most of these emails have no relationship whatsoever to the April 2016 briefing at Harvard referenced in the request, or to litigation or potential litigation against fossil fuel companies for climate change harms. UCLA seeks clarification that it may exclude from its response emails that contain the word "Harvard" but that are not related to the April 2016 briefing at Harvard referenced in the request, or to litigation or potential litigation against fossil fuel companies for climate change harms.

Thanks,  
Cara

---

**From:** Carlson, Ann  
**Sent:** Monday, March 12, 2018 2:01 PM  
**To:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>; Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)>  
**Cc:** Baldridge, Robert <[rbaldridge@finance.ucla.edu](mailto:rbaldridge@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** Re: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

I realize we may not have a conference line? I'm calling in from a cell phone. I can create the conference from my iPhone if you send me the numbers where I should call you

Ann Carlson  
Shirley Shapiro Professor of Environmental Law  
Faculty Co-Director, Emmett Institute on Climate Change and the Environment  
UCLA School of Law  
(310) 206-9496

---

**From:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>  
**Sent:** Thursday, March 8, 2018 6:13:14 PM  
**To:** Carlson, Ann; Horowitz, Cara  
**Cc:** Baldridge, Robert; Donmez, Ayse  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Great - if you will be off campus, please just let me know what number we should use to conference you in.

Thanks!  
Marisa

---

**From:** Carlson, Ann [<mailto:carlson@law.ucla.edu>]  
**Sent:** Thursday, March 08, 2018 11:51 AM  
**To:** Horowitz, Cara <[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)>; Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>  
**Cc:** Baldridge, Robert <[rbaldridge@finance.ucla.edu](mailto:rbaldridge@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** Re: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Not sure yet so conference line would be best. Thanks!

Ann Carlson  
Shirley Shapiro Professor of Environmental Law  
Faculty Co-Director, Emmett Institute on Climate Change and the Environment  
UCLA School of Law  
(310) 206-9496

---

**From:** Horowitz, Cara  
**Sent:** Thursday, March 8, 2018 11:46:31 AM  
**To:** Hawkins, Marisa; Carlson, Ann  
**Cc:** Baldrige, Robert; Donmez, Ayse  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Conference line is probably best (unless you'll be in the office and able to join me, Ann?). Thank you.

---

**From:** Hawkins, Marisa [<mailto:mhawkins@finance.ucla.edu>]  
**Sent:** Thursday, March 8, 2018 11:43 AM  
**To:** Carlson, Ann <[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)>; Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

That sounds good. We will call at 2pm on Monday – will we need to conference one of you in, or will you be together?

Thanks,  
Marisa

---

**From:** Carlson, Ann [<mailto:carlson@law.ucla.edu>]  
**Sent:** Thursday, March 08, 2018 11:39 AM  
**To:** Horowitz, Cara <[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)>; Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** Re: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

It also works for me and phone is fine for me (actually better).

Ann Carlson  
Shirley Shapiro Professor of Environmental Law  
Faculty Co-Director, Emmett Institute on Climate Change and the Environment  
UCLA School of Law  
(310) 206-9496

---

**From:** Horowitz, Cara  
**Sent:** Thursday, March 8, 2018 10:28:21 AM  
**To:** Hawkins, Marisa; Carlson, Ann  
**Cc:** Baldrige, Robert; Donmez, Ayse

**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Yes for me, thanks. Should we do it by phone?

---

**From:** Hawkins, Marisa [<mailto:mhawkins@finance.ucla.edu>]  
**Sent:** Thursday, March 8, 2018 9:11 AM  
**To:** Carlson, Ann <[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)>; Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Dear Cara and Ann,

Would Monday at 2pm work for you both?

Thanks,  
Marisa

---

**From:** Carlson, Ann [<mailto:carlson@law.ucla.edu>]  
**Sent:** Wednesday, March 07, 2018 12:30 PM  
**To:** Horowitz, Cara <[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)>  
**Cc:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>; Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** Re: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Monday would work for me or Tuesday after 3. Thanks!

On Mar 7, 2018, at 12:21 PM, Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)> wrote:

Thank you, Marisa. Ann and I would like to discuss this request with counsel in your office. Would that be possible? Perhaps sometime early next week?

I am relatively free Monday afternoon (except from 3pm-3:30) and Tuesday afternoon after 1:30.

Thanks,  
Cara

Cara Horowitz  
Andrew Sabin Family Foundation Co-Executive Director  
Emmett Institute on Climate Change and the Environment  
UCLA School of Law  
Ph (310) 206-4033  
[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)  
[www.law.ucla.edu/emmett](http://www.law.ucla.edu/emmett)

---

**From:** Hawkins, Marisa [<mailto:mhawkins@finance.ucla.edu>]  
**Sent:** Thursday, March 1, 2018 12:02 PM  
**To:** Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)>; Carlson, Ann <[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Dear Professor Horowitz and Professor Carlson,

My name is Marisa Hawkins and I am a staff member at UCLA Information Practices, working under Robert Baldrige. Mr. Baldrige recommended that I reach out to you because we recently received the attached request under the California Public Records Act (CPRA) from Christopher C. Horner, a Senior Fellow at the Competitive Enterprise Institute.

The request is somewhat involved, so I have summarized it below. Briefly, it is seeking:

1. **Emails to or from Professor Horowitz and/or Professor Carlson, dated March 1, 2016 through April 30, 2016, meeting any of the following criteria:**
  - a. **That are to or from Shaun Goho; or**
  - b. **That contain any of the following terms:**
    - i. **Harvard**
    - ii. **Pawa**
    - iii. **Frumhoff**
    - iv. **UCS**
    - v. **Eubanks**
    - vi. **CIEL**
2. **Emails to or from Professor Horowitz and/or Professor Carlson, dated December 1, 2017 through January 31, 2018, meeting any of the following criteria:**
  - a. **That relate to an event (date not specified by the requester) at UCLA, which followed up on an April 25, 2016 event at Harvard Law School; or**
  - b. **That contain any of the following terms:**
    - i. **Frumhoff**
    - ii. **McKibbon**
    - iii. **Kimmell**
    - iv. **Union of Concerned Scientists**

- v. **UCS**
- vi. **@ucsusa.org**

Would you be able to provide any responsive emails to any or all of the above requests?

Please know that the Office of Legal Affairs (OLA) is already aware of this request and that any responsive records provided will be thoroughly reviewed and vetted with the input of OLA and redacted and/or withheld where possible, pursuant to the legal exemptions to disclosure under CPRA.

For your reference, I have included our guidelines regarding the collection and forwarding of responsive emails. Please feel free to contact me if you have any questions or concerns.

Best regards,

**Marisa Hawkins**

Senior Public Records Analyst

UCLA Information Practices

(310) 206-4159

[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

**From:** [Hawkins, Marisa](#)  
**To:** [Horowitz, Cara](#); [Carlson, Ann E.](#)  
**Cc:** [Baldridge, Robert](#); [Donmez, Ayse](#)  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)  
**Date:** Friday, March 16, 2018 3:06:10 PM  
**Attachments:** [CEI UCLA Harvard Meeting request Followup.pdf](#)

---

Dear Cara and Ann,

Mr. Horner has responded to our request for clarification; I have attached his response for your reference.

With respect to the search term "Harvard" in Part I of his request, he has clarified that he is seeking **correspondence that both contains the term Harvard and relates to the April 25, 2016 briefing at Harvard.**

With respect to the UCLA event he speaks about in Part II of his request, he has clarified that he is referring to the following event: <https://law.ucla.edu/news-and-events/4065/2018/1/25/Holding-Fossil-Fuel-Companies-Liable-for-Climate-Change-Harms-in-California-c-Law-Science-and-Justice/>

Please don't hesitate to get in touch if you have any questions about his response, or about how to gather the documents for this matter.

Thank you once again for your help with this,  
Marisa

**Marisa Hawkins**

Senior Public Records Analyst  
UCLA Information Practices  
(310) 206-4159  
[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

---

**From:** Hawkins, Marisa  
**Sent:** Tuesday, March 13, 2018 10:46 AM  
**To:** Horowitz, Cara <HOROWITZ@law.ucla.edu>; Carlson, Ann E. <carlson@law.ucla.edu>  
**Cc:** Baldridge, Robert <rbaldridge@finance.ucla.edu>; Donmez, Ayse <adonmez@finance.ucla.edu>  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Dear Cara and Ann,

Thank you for taking the time to talk yesterday, and for alerting us to the issues that require further clarification from the requester. We have sent a clarification letter to Mr. Horner, incorporating your language below. I will let you know as soon as we hear back from him. In the meantime, it would be very helpful if you could gather any responsive documents that are not affected by the clarification request, so that our office can begin the process of review.

Thanks once again for your help on this matter.

Best,  
Marisa

**Marisa Hawkins**

Senior Public Records Analyst  
UCLA Information Practices  
(310) 206-4159  
[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

---

**From:** Horowitz, Cara [<mailto:HOROWITZ@law.ucla.edu>]

**Sent:** Monday, March 12, 2018 2:47 PM

**To:** Carlson, Ann E. <[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)>; Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>

**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>

**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Thanks for the call today. As promised, here's information on seeking clarification as to Part II of the request:

-Part II of the request states that "UCLA held a follow-up event [to the April 2016 Harvard Law School workshop], moderated by Ms. Horowitz with the participation of Prof. Carlson", and asks for correspondence relating to this UCLA event that meets certain criteria. UCLA did not hold a follow-up event to the April 2016 Harvard Law School workshop. Does the requester intend to reference a public discussion of recently filed litigation by local governments against fossil fuel companies for climate change harms, held at UCLA's Fowler Museum on January 25, 2018? That event was moderated by Ms. Horowitz, and Professor Carlson participated.

And here's a stab at asking for clarification on the Harvard emails point – Ann can weigh in here if she has other suggestions:

-Part I of the request asks for all correspondence sent, received, or possessed by Cara Horowitz or Ann Carlson dated from March 1, 2016 to April 30, 2016, which includes the term "Harvard." Both faculty members receive an extraordinary number of emails that contain the term "Harvard," including through academic email listservs and from other sources. Most of these emails have no relationship whatsoever to the April 2016 briefing at Harvard referenced in the request, or to litigation or potential litigation against fossil fuel companies for climate change harms. UCLA seeks clarification that it may exclude from its response emails that contain the word "Harvard" but that are not related to the April 2016 briefing at Harvard referenced in the request, or to litigation or potential litigation against fossil fuel companies for climate change harms.

Thanks,  
Cara

---

**From:** Carlson, Ann

**Sent:** Monday, March 12, 2018 2:01 PM

**To:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>; Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)>

**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>

**Subject:** Re: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

I realize we may not have a conference line? I'm calling in from a cell phone. I can create the conference from my iPhone if you send me the numbers where I should call you

Ann Carlson

Shirley Shapiro Professor of Environmental Law

Faculty Co-Director, Emmett Institute on Climate Change and the Environment

UCLA School of Law

(310) 206-9496

---

**From:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>

**Sent:** Thursday, March 8, 2018 6:13:14 PM

**To:** Carlson, Ann; Horowitz, Cara

**Cc:** Baldrige, Robert; Donmez, Ayse

**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Great - if you will be off campus, please just let me know what number we should use to conference you in.

Thanks!

Marisa

---

**From:** Carlson, Ann [<mailto:carlson@law.ucla.edu>]

**Sent:** Thursday, March 08, 2018 11:51 AM

**To:** Horowitz, Cara <[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)>; Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>

**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>

**Subject:** Re: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Not sure yet so conference line would be best. Thanks!

Ann Carlson

Shirley Shapiro Professor of Environmental Law

Faculty Co-Director, Emmett Institute on Climate Change and the Environment

UCLA School of Law

(310) 206-9496

---

**From:** Horowitz, Cara

**Sent:** Thursday, March 8, 2018 11:46:31 AM

**To:** Hawkins, Marisa; Carlson, Ann

**Cc:** Baldrige, Robert; Donmez, Ayse

**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Conference line is probably best (unless you'll be in the office and able to join me, Ann?). Thank you.

---

**From:** Hawkins, Marisa [<mailto:mhawkins@finance.ucla.edu>]  
**Sent:** Thursday, March 8, 2018 11:43 AM  
**To:** Carlson, Ann <[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)>; Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

That sounds good. We will call at 2pm on Monday – will we need to conference one of you in, or will you be together?

Thanks,  
Marisa

---

**From:** Carlson, Ann [<mailto:carlson@law.ucla.edu>]  
**Sent:** Thursday, March 08, 2018 11:39 AM  
**To:** Horowitz, Cara <[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)>; Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** Re: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

It also works for me and phone is fine for me (actually better).

Ann Carlson  
Shirley Shapiro Professor of Environmental Law  
Faculty Co-Director, Emmett Institute on Climate Change and the Environment  
UCLA School of Law  
(310) 206-9496

---

**From:** Horowitz, Cara  
**Sent:** Thursday, March 8, 2018 10:28:21 AM  
**To:** Hawkins, Marisa; Carlson, Ann  
**Cc:** Baldrige, Robert; Donmez, Ayse  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Yes for me, thanks. Should we do it by phone?

---

**From:** Hawkins, Marisa [<mailto:mhawkins@finance.ucla.edu>]  
**Sent:** Thursday, March 8, 2018 9:11 AM  
**To:** Carlson, Ann <[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)>; Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** RE: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Dear Cara and Ann,

Would Monday at 2pm work for you both?

Thanks,  
Marisa

---

**From:** Carlson, Ann [<mailto:carlson@law.ucla.edu>]  
**Sent:** Wednesday, March 07, 2018 12:30 PM  
**To:** Horowitz, Cara <[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)>  
**Cc:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>; Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** Re: Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Monday would work for me or Tuesday after 3. Thanks!

On Mar 7, 2018, at 12:21 PM, Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)> wrote:

Thank you, Marisa. Ann and I would like to discuss this request with counsel in your office. Would that be possible? Perhaps sometime early next week?

I am relatively free Monday afternoon (except from 3pm-3:30) and Tuesday afternoon after 1:30.

Thanks,  
Cara

Cara Horowitz  
Andrew Sabin Family Foundation Co-Executive Director  
Emmett Institute on Climate Change and the Environment  
UCLA School of Law  
Ph (310) 206-4033  
[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)  
[www.law.ucla.edu/emmett](http://www.law.ucla.edu/emmett)

---

**From:** Hawkins, Marisa [<mailto:mhawkins@finance.ucla.edu>]  
**Sent:** Thursday, March 1, 2018 12:02 PM  
**To:** Horowitz, Cara <[HOROWITZ@law.ucla.edu](mailto:HOROWITZ@law.ucla.edu)>; Carlson, Ann <[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>  
**Subject:** Public Records Request Re Emails of Professors Horowitz and Carlson (18-5367)

Dear Professor Horowitz and Professor Carlson,

My name is Marisa Hawkins and I am a staff member at UCLA Information Practices, working under Robert Baldrige. Mr. Baldrige recommended that I reach out to you because we recently received the attached request under the California Public Records Act (CPRA) from Christopher C. Horner, a Senior Fellow at the Competitive Enterprise Institute.

The request is somewhat involved, so I have summarized it below. Briefly, it is seeking:

1. **Emails to or from Professor Horowitz and/or Professor Carlson, dated March 1, 2016 through April 30, 2016, meeting any of the following criteria:**
  - a. **That are to or from Shaun Goho; or**
  - b. **That contain any of the following terms:**
    - i. **Harvard**
    - ii. **Pawa**
    - iii. **Frumhoff**
    - iv. **UCS**
    - v. **Eubanks**
    - vi. **CIEL**
2. **Emails to or from Professor Horowitz and/or Professor Carlson, dated December 1, 2017 through January 31, 2018, meeting any of the following criteria:**
  - a. **That relate to an event (date not specified by the requester) at UCLA, which followed up on an April 25, 2016 event at Harvard Law School; or**
  - b. **That contain any of the following terms:**
    - i. **Frumhoff**
    - ii. **McKibbon**
    - iii. **Kimmell**
    - iv. **Union of Concerned Scientists**
    - v. **UCS**
    - vi. **@ucsusa.org**

Would you be able to provide any responsive emails to any or all of the above requests?

Please know that the Office of Legal Affairs (OLA) is already aware of this request and that any responsive records provided will be thoroughly reviewed and vetted with the input of OLA and redacted and/or withheld where possible, pursuant to the legal exemptions to disclosure under CPRA.

For your reference, I have included our guidelines regarding the collection and forwarding of responsive emails. Please feel free to contact me if you have any

questions or concerns.

Best regards,

**Marisa Hawkins**

Senior Public Records Analyst

UCLA Information Practices

(310) 206-4159

[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)



March 13, 2018

Records Management & Information Practices  
10920 Wilshire Boulevard  
Suite 530  
Los Angeles, CA 90024-6541

**BY ELECTRONIC MAIL** — [records@ucla.edu](mailto:records@ucla.edu), [pra@finance.ucla.edu](mailto:pra@finance.ucla.edu)

**Re: PRR # 18-5367**

UCLA Records Management Officer,

We have received your March 13, 2018 request for more specificity regarding a February 5, 2018 request of ours pursuant to the California Government Code.

You ask whether our request sent seven weeks ago seeks described records relating to the April 25, 2016 briefing at Harvard. That request specified that it seeks:

- I. copies of all correspondence and its accompanying information<sup>1</sup>, including also any attachments, that were sent by, sent to (including copying, whether as cc: or bcc:) or otherwise were received or are possessed by UCLA School of Law's Cara Horowitz, and/or Ann Carlson, dated from March 1, 2016 to April 30, 2016, inclusive, which are also:
  - a) to or from Shaun Goho, *and/or*
  - b) which use any of the following terms, *anywhere* in the correspondence be it the to, from, cc, bcc, and/or Subject fields and/or body of the email: i) Harvard, ii) Pawa, iii) Frumhoff, iv) UCS, v) Eubanks, and/or vi) CIEL (these terms are not case sensitive).

---

<sup>1</sup> This includes public records, and associated public information, see discussion of Data Delivery Standards, *infra*.



Public records show that Professor Horowitz participated in an April 25, 2016 briefing at Harvard Law School on “Potential Causes of Action Against Major Carbon Producers: Scientific, Legal and Historical Perspectives”, attended by other academics, environmentalist pressure group activists, private attorneys and public employees of various state attorney general offices. The agenda listed the participating UCLA faculty in their capacity as UCLA faculty. Other participants blogged about the event, with one publishing, in relevant part, “We were joined by a superb set of panelists, including ... Cara Horowitz, co-director of the Emmett Center on Climate Change and the Environment at UCLA Law School”. **We seek correspondence relating to this trip, presentation, and other assistance provided Prof. Horowitz and/or her colleague Ms. Carlson to the extent this information was produced or received using University resources.**

(emphasis added)

Although the closing sentence appears to answer your question, given the issue has been weighing on the school’s mind these many weeks, we will further clarify that this request seeks

- \* copies of all correspondence [etc.] sent by, sent to (including copying, whether as cc: or bcc:) or otherwise received/possessed by Cara Horowitz, and/or Ann Carlson, dated from March 1, 2016 to April 30, 2016, inclusive, which are to or from Shaun Goho; and/or
- \* copies of all correspondence [etc.] sent by, sent to (including copying, whether as cc: or bcc:) or otherwise received/possessed by Cara Horowitz, and/or Ann Carlson, dated from March 1, 2016 to April 30, 2016, inclusive, which use any of the following terms, *anywhere* in the



correspondence be it the to, from, cc, bcc, and/or Subject fields and/or body of the email: i)

Pawa, ii) Frumhoff, iii) UCS, iv) Eubanks, and/or v) CIEL (these terms are not case sensitive);

and/or

\* copies of all correspondence [etc.] sent by, sent to (including copying, whether as cc: or bcc:) or otherwise received/possessed by Cara Horowitz, and/or Ann Carlson, dated from March 1, 2016 to April 30, 2016, inclusive, which use Harvard *anywhere* in the correspondence be it the to, from, cc, bcc, and/or Subject fields and/or body of the email and which relates to the April 25, 2016 briefing at Harvard.

You also ask whether Part II of our request, addressing the UCLA follow-up event moderated by Ms. Horowitz with the participation of Prof. Carlson seeks certain specified correspondence relating to this event, which event is posted on the School's website <https://law.ucla.edu/news-and-events/4065/2018/1/25/Holding-Fossil-Fuel-Companies-Liable-for-Climate-Change-Harms-in-California-c--Law-Science-and-Justice/> (last visited today). The answer is that yes, it does.

We incorporate all instructions regarding information delivery standards, time parameters and other details in the original request as if repeated herein.

1310 L Street, NW, 7th Floor  
Washington, DC 20005  
cei.org

202 331 1010 *voice*  
202 331 0640 *fax*



If you have any questions please do not hesitate to contact me. We look forward to your timely response.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Chris Horner", is written over a light gray rectangular background.

Christopher C. Horner  
Senior Fellow, CEI  
1310 L Street, NW, 7th Floor  
Washington D.C. 20007  
[chris.horner@cei.org](mailto:chris.horner@cei.org)  
202.262.4458

**From:** [Carlson, Ann](#)  
**To:** [Hawkins, Marisa](#)  
**Cc:** [Baldridge, Robert](#); [Donmez, Ayse](#); [Horowitz, Cara](#)  
**Subject:** Re: Competitive Enterprise Institute Request #2 Re Emails of Professors Horowitz and Carlson (18-5666)  
**Date:** Monday, May 28, 2018 8:45:43 AM

---

Again, do I need to produce any correspondence that references the word Harvard? There will be many, none of which, I believe, they are interested in. Or am I misunderstanding the request in that they want "shaun goho" plus any of the additional words?

Ann Carlson  
Shirley Shapiro Professor of Environmental Law  
Faculty Co-Director, Emmett Institute on Climate Change and the Environment  
UCLA School of Law  
(310) 206-9496

---

**From:** Hawkins, Marisa <mhawkins@finance.ucla.edu>  
**Sent:** Friday, May 25, 2018 3:53 PM  
**To:** Carlson, Ann  
**Cc:** Baldridge, Robert; Donmez, Ayse  
**Subject:** Competitive Enterprise Institute Request #2 Re Emails of Professors Horowitz and Carlson (18-5666)

Dear Ann,

Information Practices has received a second request, herein attached, from Christopher Horner at the Competitive Enterprise Institute. This new request is seeking the following:

**“...copies of all correspondence and its accompanying information, including also any attachments, that were sent by, sent to (including copying, whether as cc: or bcc:) or otherwise were received or are possessed by UCLA School of Law’s Cara Horowitz, and/or Ann Carlson, dated from May 1, 2016 through the date you process this request, inclusive, which are also:**

**a) to or from Shaun Goho, and/or**

**b) which use any of the following terms, anywhere in the correspondence be it the to, from, cc, bcc, and/or Subject fields and/or body of the email or attachments: i) Harvard, ii) Pawa, iii) Eubanks, iv) McKibben, v) Kimmell, vi) “Union of Concerned Scientists”, and/or vii) @ucsusa.org.”**

Would you be able to provide any responsive emails? Since this new request covers a span of

two years, it would be helpful, as a preliminary matter, if you could give me an estimate of how many records we might be dealing with.

Please know that the Office of Legal Affairs (OLA) is already aware of this request and that any responsive records provided will be thoroughly reviewed and vetted with the input of OLA and redacted and/or withheld where possible, pursuant to the legal exemptions to disclosure under CPRA.

As always, please do not hesitate to contact me if you have questions or concerns, and thank you in advance for your assistance with this matter.

Best,  
Marisa

**Marisa Hawkins**

Senior Public Records Analyst

UCLA Information Practices

(310) 206-4159

[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

**From:** [Hawkins, Marisa](#)  
**To:** [Carlson, Ann](#); [Horowitz, Cara](#)  
**Subject:** RE: Competitive Enterprise Institute Request #2 Re Emails of Professors Horowitz and Carlson (18-5666)  
**Date:** Tuesday, June 12, 2018 12:40:25 PM  
**Attachments:** [Emails - Guidelines re Collection for Production.pdf](#)

---

Hi Ann and Cara,

I apologize for my delayed response. I believe that with this records request, Christopher Horner does in fact intend for us to search for all terms exactly as he has listed them. I realize that this will result in a potentially large number of emails, but I do think he intends to throw a wide net this time, even if it does capture a number of irrelevant communications.

Do you have a rough idea of how many emails we might be talking about? A guesstimate is fine, as I will need to give Mr. Horner an estimated production date very soon.

Since we are likely to have a rather large number of emails (too many to forward individually), I've attached our guidelines on collecting and sending along responsive emails. Alternatively, it is often easier to drag and drop large numbers of emails into a shared Box folder. Let me know if you'd rather do it that way, and I can set it up.

Thanks!  
Marisa

**Marisa Hawkins**

Senior Public Records Analyst  
UCLA Information Practices  
(310) 206-4159  
[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

---

**From:** Carlson, Ann [mailto:[carlson@law.ucla.edu](mailto:carlson@law.ucla.edu)]  
**Sent:** Monday, May 28, 2018 8:46 AM  
**To:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>  
**Cc:** Baldrige, Robert <[rbaldrige@finance.ucla.edu](mailto:rbaldrige@finance.ucla.edu)>; Donmez, Ayse <[adonmez@finance.ucla.edu](mailto:adonmez@finance.ucla.edu)>; Horowitz, Cara <[horowitz@law.ucla.edu](mailto:horowitz@law.ucla.edu)>  
**Subject:** Re: Competitive Enterprise Institute Request #2 Re Emails of Professors Horowitz and Carlson (18-5666)

Again, do I need to produce any correspondence that references the word Harvard? There will be many, none of which, I believe, they are interested in. Or am I misunderstanding the request in that they want "shaun goho" plus any of the additional words?

Ann Carlson  
Shirley Shapiro Professor of Environmental Law  
Faculty Co-Director, Emmett Institute on Climate Change and the Environment  
UCLA School of Law

(310) 206-9496

---

**From:** Hawkins, Marisa <[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)>  
**Sent:** Friday, May 25, 2018 3:53 PM  
**To:** Carlson, Ann  
**Cc:** Baldrige, Robert; Donmez, Ayse  
**Subject:** Competitive Enterprise Institute Request #2 Re Emails of Professors Horowitz and Carlson (18-5666)

Dear Ann,

Information Practices has received a second request, herein attached, from Christopher Horner at the Competitive Enterprise Institute. This new request is seeking the following:

**“...copies of all correspondence and its accompanying information, including also any attachments, that were sent by, sent to (including copying, whether as cc: or bcc:) or otherwise were received or are possessed by UCLA School of Law’s Cara Horowitz, and/or Ann Carlson, dated from May 1, 2016 through the date you process this request, inclusive, which are also:**

**a) to or from Shaun Goho, and/or**

**b) which use any of the following terms, anywhere in the correspondence be it the to, from, cc, bcc, and/or Subject fields and/or body of the email or attachments: i) Harvard, ii) Pawa, iii) Eubanks, iv) McKibben, v) Kimmell, vi) “Union of Concerned Scientists”, and/or vii) @ucsusa.org.”**

Would you be able to provide any responsive emails? Since this new request covers a span of two years, it would be helpful, as a preliminary matter, if you could give me an estimate of how many records we might be dealing with.

Please know that the Office of Legal Affairs (OLA) is already aware of this request and that any responsive records provided will be thoroughly reviewed and vetted with the input of OLA and redacted and/or withheld where possible, pursuant to the legal exemptions to disclosure under CPRA.

As always, please do not hesitate to contact me if you have questions or concerns, and thank you in advance for your assistance with this matter.

Best,  
Marisa

**Marisa Hawkins**

Senior Public Records Analyst

UCLA Information Practices

(310) 206-4159

[mhawkins@finance.ucla.edu](mailto:mhawkins@finance.ucla.edu)

## **Emails: Guidelines Regarding Collecting and Forwarding**

Please search your folders for any responsive emails, including archived folders/emails, and then provide them to us, preferably as attachments to a single email or, if too voluminous for that, as an Outlook PST file saved on a CD or flash drive. If you need help with searching and retrieving the emails, either your IT department or someone from my department will be able to assist you. Please know that all emails will be thoroughly reviewed by our department and Campus Counsel to see if any legal exemptions exist to prevent disclosure, (such as attorney-client privilege, or Academic Freedom regarding scholarly research, among others).

**If simply forwarding emails**, it is preferable that you **not** forward each one individually, as we would then not be able to print out and/or PDF/save each email without having it now include us in the correspondence (from you, to us), and so that portion would then have to be redacted back out of what is produced. Therefore, please use the method as seen in the attachment: "Guide to Forwarding Emails as Attachments to a Single Email," which provides screenshots and simple instructions.

As noted, if the amount of emails is too voluminous to forward as attachments to one or more emails, then creating a PST file in Outlook might be the best way to go...

**If creating a PST file:** In case you're not familiar with how to create a PST file to export your emails, the following link provides step-by-step instructions with pictures: <http://office.microsoft.com/en-us/outlook-help/export-outlook-items-to-an-outlook-data-file-pst-HA102534110.aspx>. We have also provided the steps below:

On the main Outlook screen click 'File' tab then select 'Options'

1. Click 'Advanced'
2. Under the export section click 'Export'
3. Select 'Export to a file' then click 'Next'
4. Select "Outlook Data File (.pst)" then click 'Next'
5. Select the desired folder and click 'Next'
6. Save the file to a location you'll be able to find later then click 'Finish'  
\*optional\* add a password and click 'OK'

Upload the created PST file to a CD or flash drive and then forward that to the attention of the Information Practices staff member handling the matter. If using Campus Mail, send it to the person's attention at Records Management and Information Practices, Wilshire Center, Suite 530. Mail code: 143348.

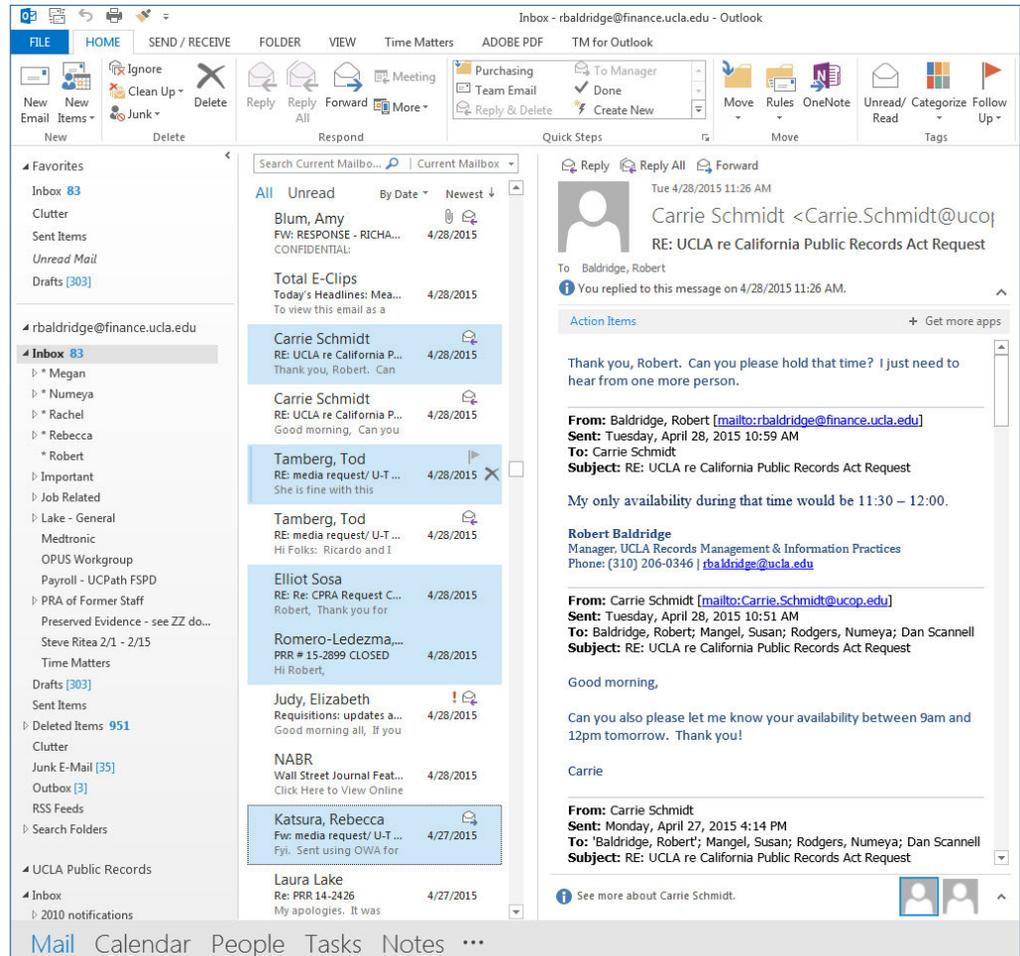
## Forwarding Emails as Attachments to a Single Email

As noted, if simply forwarding emails, it is preferable that you **not** forward each one individually, as I would then not be able to print out and/or PDF/save each email without having it now include me in the correspondence (from you, to me), and so that portion would then have to be redacted back out of what is produced. Therefore, please use the following method, which will be less time-consuming for both of us:

### Instructions for attaching emails to a single email:

#### Step 1:

While holding down the “Ctrl” key click on each responsive email, which will leave you with highlighted emails, as seen here:



The screenshot displays the Outlook interface for the account 'rbaldrige@finance.ucla.edu'. The left sidebar shows the 'Inbox' folder with 83 items, and several individual emails are highlighted in blue. The main pane shows a list of these highlighted emails, including:

- Carrie Schmidt: RE: UCLA re California P... (4/28/2015)
- Carrie Schmidt: RE: UCLA re California P... (4/28/2015)
- Tamberg, Tod: RE: media request/ U-T... (4/28/2015)
- Tamberg, Tod: RE: media request/ U-T... (4/28/2015)
- Elliot Sosa: RE: Re: CPRA Request C... (4/28/2015)
- Romero-Ledezma, ...: PRR # 15-2899 CLOSED (4/28/2015)
- Judy, Elizabeth: Requisitions: updates a... (4/28/2015)
- NABR: Wall Street Journal Feat... (4/28/2015)
- Katsura, Rebecca: Fw: media request/ U-T... (4/27/2015)
- Laura Lake: Re: PRR 14-2426 (4/27/2015)

The right pane shows the details of the selected email from Carrie Schmidt, dated Tue 4/28/2015 11:26 AM. The subject is 'RE: UCLA re California Public Records Act Request'. The body of the email contains the following text:

Thank you, Robert. Can you please hold that time? I just need to hear from one more person.

**From:** Baldridge, Robert [mailto:rbaldrige@finance.ucla.edu]  
**Sent:** Tuesday, April 28, 2015 10:59 AM  
**To:** Carrie Schmidt  
**Subject:** RE: UCLA re California Public Records Act Request

My only availability during that time would be 11:30 – 12:00.

**Robert Baldridge**  
Manager, UCLA Records Management & Information Practices  
Phone: (310) 206-0346 | rbaldrige@ucla.edu

**From:** Carrie Schmidt [mailto:Carrie.Schmidt@ucop.edu]  
**Sent:** Tuesday, April 28, 2015 10:51 AM  
**To:** Baldridge, Robert; Mangel, Susan; Rodgers, Numeya; Dan Scannell  
**Subject:** RE: UCLA re California Public Records Act Request

Good morning,

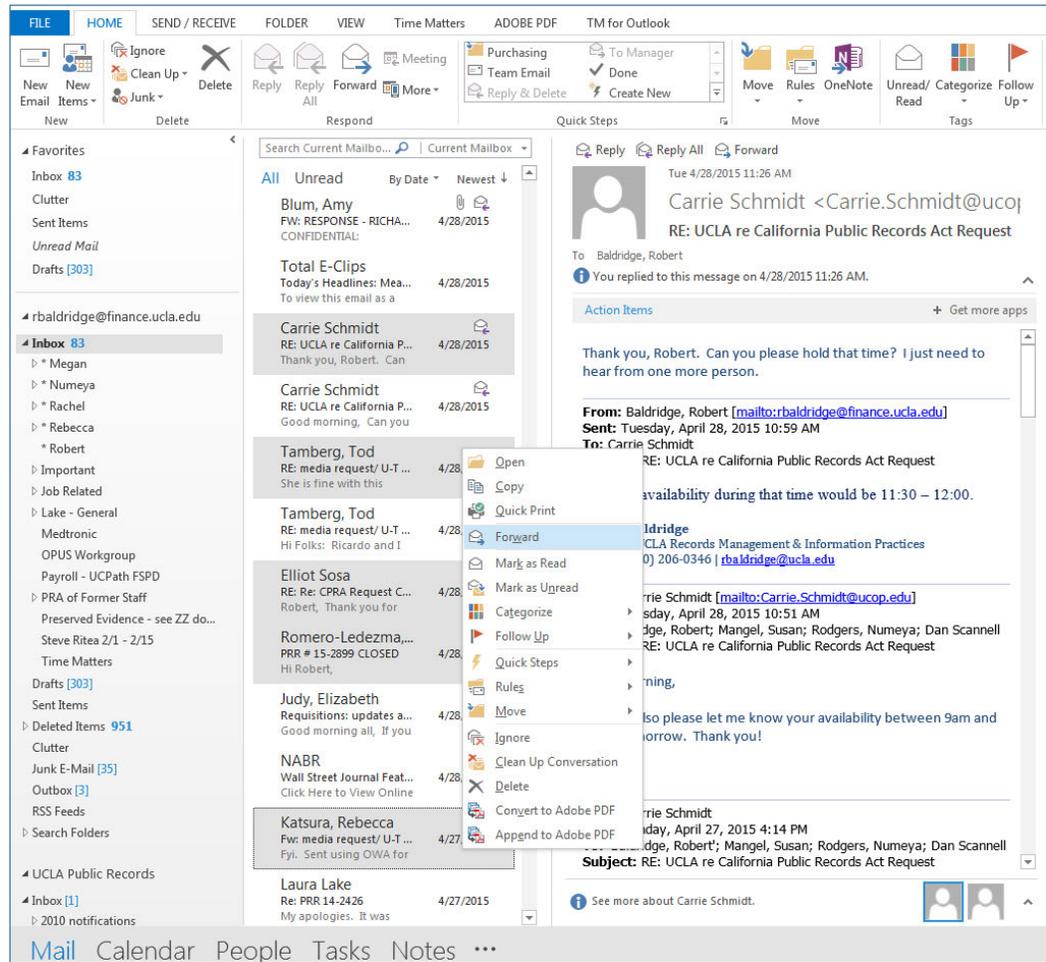
Can you also please let me know your availability between 9am and 12pm tomorrow. Thank you!

Carrie

**From:** Carrie Schmidt  
**Sent:** Monday, April 27, 2015 4:14 PM  
**To:** 'Baldridge, Robert'; Mangel, Susan; Rodgers, Numeya; Dan Scannell  
**Subject:** RE: UCLA re California Public Records Act Request

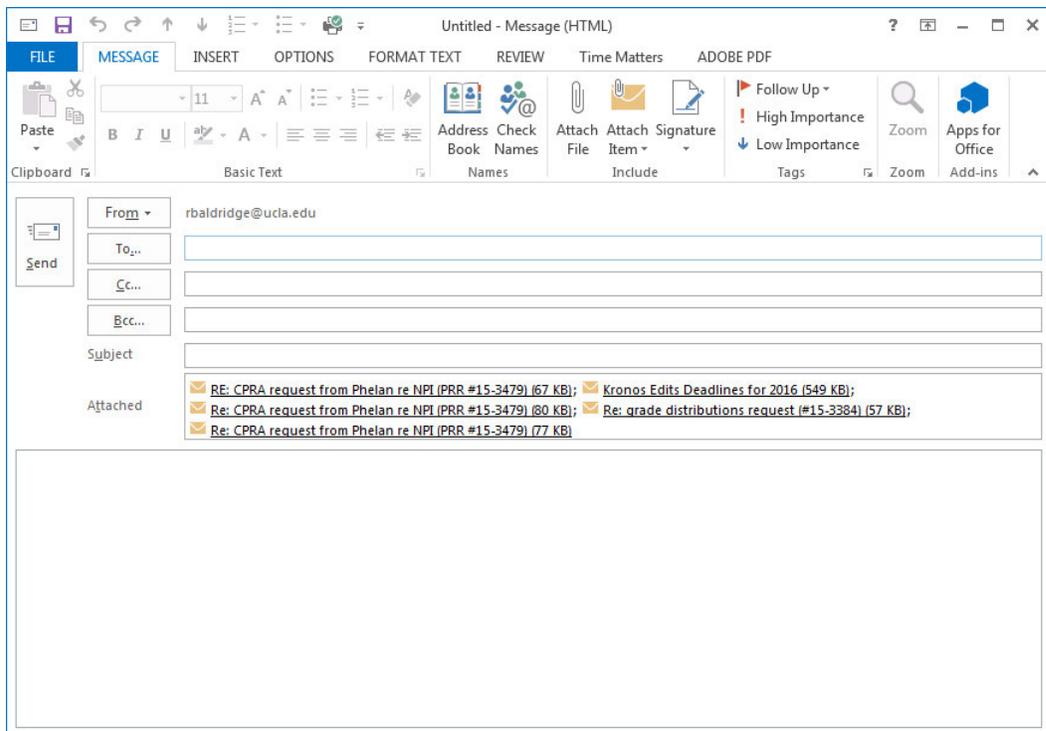
Step 2:

Then right-click on any of the highlighted emails, which will cause a dialog box to appear, as seen here. Scroll to “Forward” and left-click on it.



Step 3:

Thereafter, a new email will open up, with all the selected emails included as attachments. Now, simply forward that email to me.



## Upward Trend in Records Requests Received by Information Practices

as of March 31, 2019

Month	FY 2016/17	FY 2017/18	FY 2018/19	Amount Over Same Period for FY 2017/18	% Over Same Period for FY 2017/18
July	36	55	77	22	40%
August	48	51	83	54	51%
September	45	41	71	84	57%
October	48	69	92	107	50%
November	33	57	75	125	46%
December	30	48	62	139	43%
January	80	56	106	189	50%
February	54	60	90	219	50%
March	78	68	101	252	50%
April	50	71			
May	51	89			
June	42	87			
<b>Totals</b>	<b>595</b>	<b>752</b>	<b>757</b>		

**Red numbers** indicate record-breaking months (i.e. – highest number of requests received for a month of May, month of June, etc.) since FY 2011-12

As seen in the chart to the left, there has been a major uptick in requests/subpoenas for records, which has resulted in the breaking of previous records for the amount of requests received in a single month, quarter, and year, as summarized below.

### Year

752 requests for records were received in FY 2018, which set a new record and was 26.4% higher in volume over the prior year of FY 2017. In just the first three quarters of the current fiscal year (FY 2019), though, we've already broken that total, with **757** requests received ... and we still have three months to go.

### Quarter

297 requests were received in the third quarter of FY 2019 (January-March), destroying the record of 247 that had been set in the 4th quarter of FY 2018 (April-June).

**NOTE:** Importantly, these figures only represent the number of *overall* requests received, which is quite different/lower than the number of individual requests within them that have to be processed, since it's not uncommon for a request to actually include dozens of individual requests. (e.g. A requester may itemize dozens of areas of records being sought, causing us to have to collect records from a multitude of document custodians from multiple departments.)

Additionally, IP has seen a fairly dramatic increase in subpoenas over the last few years, as illustrated below:

FY 2013-14	23
FY 2014-15	36
FY 2015-16	59
FY 2016-17	73
FY 2017-18	119

For FY 2017-18, this amounted to a roughly **63% increase over just the prior year, and a 417% increase over the last four years (since FY 2014).**

**NOTE:** Responding to subpoenas often has to take priority, being that they essentially carry the weight of a court order and usually have tight deadlines to produce records, whereas CPRA compliance is more broad and allows for the *estimate* of when documents can be produced, based on various factors such as staffing resources, projected collection and review time, number and complexity of other requests already in the queue being processed by staff, etc. Consequently, dealing with multiple subpoenas can unfortunately cause the response time on CPRA requests to be extended, particularly when dealing with an unexpected and unprecedented increase in subpoenas, as has been the case at UCLA.