

August 15, 2023

Via Email: KaylieF@peta.org

Kaylie Flaughter
People for the Ethical Treatment of Animals

**Re: Texas Public Information Act Request Received August 2, 2023 – K. Flaughter
#2**

Dear Kaylie Flaughter:

On August 2, 2023, you submitted an email to the University of Texas Southwestern Medical Center (“UT Southwestern”), a copy of which is enclosed, seeking the following information:

From the period of February 17, 2023, to the date this request is processed, PETA request all emails, correspondence, memoranda, meeting notes, presentations, figures, protocols, veterinary care and disposition records, photos and/or videos related to PETA and/or the use of animals in UT Southwestern Medical Center’s obstetrics and gynecology (OB/GYN) residency training.

Your email constitutes a request for information pursuant to the Texas Public Information Act (the “Act”), Tex. Gov’t Code §§ 552.001-.353 (Vernon 2004). Please note that living animal models are no longer utilized in OB/GYN residency training program simulation activities.

At this time, UT Southwestern requires clarification and/or narrowing of your request pursuant to Section 552.222 of the Act. Please provide the following clarification and/or narrowing:

1. Your request seeks specified materials, including emails, “related to PETA *and/or* the use of animals in [UT Southwestern’s OB/GYN residency training]” from a certain period (emphasis added). As you have not identified custodians who may have potentially responsive information, conducting a search would require us to contact over 18,000 UT Southwestern employees and instruct them to perform a manual search. Coordinating an effort of this size would require extensive resources and time, and may prove to be prohibitively expensive. Suggested ways in which you may narrow your request include:
 - i. Modify the scope of your request to the specified records as they relate to PETA *and* the use of animals in UT Southwestern’s OB/GYN

residency training (*i.e.*, exclude “or” in the request’s reference to “PETA and/or the use of animals”) or as they relate to only the use of animals in UT Southwestern’s OB/GYN residency training (*i.e.*, exclude information relating only to PETA); and

- ii. Identify custodians by name, department, or job title.
2. Trainees may practice certain skills on food items (*e.g.*, meat products such as chicken breasts or cow tongue). Does the term “animal” include food items, such as meat products procured from retailers?
3. As to the requested figures, to what does this refer?
4. To the extent your request encompasses attorney-client privileged communications and medical committee records excepted from disclosure under the Act, do you agree to exclude this material? If not, a ruling from the Texas Attorney General’s Office would be required which may take up to 45 business days.

I must inform you that if you do not respond to this request for clarification in writing within 61 days from the date of this letter, your request will be considered withdrawn. *See* Tex. Gov’t Code § 552.222(d)-(e). Upon receipt of your written clarification and/or modifications, if any, we will review any documents responsive to your request for release in light of any applicable exceptions under the Act, along with any estimate of charges mandated by the Act, and will provide you a written response. Please provide your clarifications and/or modifications, in writing to me at the above listed address, by fax at (214) 648-8805 or by email to christina.alvarado@utsouthwestern.edu.

Yours very truly,



Christina Alvarado, J.D.

Enclosures

From: [Kaylie Flaughner](#)
To: [PublicInformation](#)
Subject: Public Records Request
Date: Wednesday, August 2, 2023 4:34:36 PM
Attachments: [2023-08-02-records-request-re-peta-ob-gyn_SS.pdf](#)

EXTERNAL MAIL

Dear Ms. Sine,

Please find enclosed a request for public records made on behalf of People for the Ethical Treatment of Animals (PETA) pursuant to Chapter 552 of the Texas Government Code.

Thank you,

Kaylie Flaughner (she/her)

Executive Coordinator to the Vice Presidents
Laboratory Investigations Department
People for the Ethical Treatment of Animals (PETA)

CAUTION: This email originated from outside UTSW. Please be cautious of links or attachments, and validate the sender's email address before replying.



August 2, 2023

Erin Sine
Director/Managing Attorney – General Legal Services
UT Southwestern Medical Center
5323 Harry Hines Blvd.
Dallas, TX 75390-9008

Via email: PublicInformation@UTSouthwestern.edu

Dear Ms. Sine,

This is a request for public records made on behalf of People for the Ethical Treatment of Animals (PETA) pursuant to Chapter 552 of the Texas Government Code.

From the period of February 17, 2023, to the date this request is processed, PETA request all emails, correspondence, memoranda, meeting notes, presentations, figures, protocols, veterinary care and disposition records, photos and/or videos related to PETA and/or the use of animals in UT Southwestern Medical Center's obstetrics and gynecology (OB/GYN) residency training.

PETA is a non-profit public interest animal protection organization whose federal tax-exempt number is 521218336. As such, we request that all fees associated with our request for public information be waived. PETA has no commercial interest in the records requested, but seeks them strictly in an effort to ensure the public is fully informed about operations and regulations involving the use of animals in laboratories (an issue of well-established public importance). If the foregoing request for a fee waiver is denied, and fees are expected to exceed \$50.00, kindly notify me by e-mail to this effect before this FOIA request is processed.

If you have any questions about our request, please contact me by e-mail at KaylieF@peta.org. Thank you for your time and effort in promptly addressing this matter, and I look forward to your response.

Sincerely yours,

Kaylie Flaughner
Executive Assistant to the Vice Presidents
Laboratory Investigations Department

PEOPLE FOR
THE ETHICAL
TREATMENT
OF ANIMALS

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757-622-PETA

Info@peta.org
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Entities

- PETA Asia
- PETA India
- PETA France
- PETA Australia
- PETA Germany
- PETA Switzerland
- PETA Netherlands
- PETA Foundation (U.K.)