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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

DEPARTMENT 36

HON. GREGORY W. ALARCON

TAMARA BUCK, SHARON BROWN, SARAH)
LUCAS, CHARLENE HOUSEN DAWNIELLE)
SELDEN, SERGE EUSTACHE, TRICIA)
EUSTACHE, AND NIKKI JENCEN,)

PLAINTIFFS,)

VS.)

CASE NO. BC 617 766)

THE STATE OF CALIFORNIA, AND)
DOES 1-99, INCLUSIVE,)

DEFENDANTS.)

REPORTER'S TRANSCRIPT OF PROCEEDINGS
THURSDAY, OCTOBER 20, 2016

APPEARANCES:

FOR PLAINTIFF:

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REPORTED BY:

KATHLEEN SMITH-MYLER, CSR NO. 12500
COURT REPORTER PRO TEMPORE

1 CASE NUMBER: BC 617 766
2 CASE NAME: BUCK V. STATE
3 LOS ANGELES, CALIFORNIA THURSDAY, OCTOBER 20, 2016
4 DEPARTMENT 36 HON. GREGORY W. ALARCON
5 REPORTER: KATHLEEN SMITH-MYLER, CSR 12500
6 TIME: A.M.

7 APPEARANCES:

8 T. MATTHEW PHILLIPS, ESQ., REPRESENTING
9 PLAINTIFFS; JONATHAN E. RICH, ESQ., AND
10 JACQUELYN Y. YOUNG, ESQ., REPRESENTING
11 DEFENDANTS.

12
13
14 **THE COURT:** BUCK VS. STATE OF CALIFORNIA. THIS IS
15 A DEMURRER HEARING.

16 EVERYBODY'S HERE ON THAT?

17 **MR. PHILLIPS:** YES, YOUR HONOR.

18 GOOD MORNING, YOUR HONOR. MAY IT PLEASE
19 THE COURT, INITIAL T, PERIOD, MATTHEW PHILLIPS FOR THE
20 PLAINTIFFS.

21 **MR. RICH:** GOOD MORNING, YOUR HONOR. DEPUTY
22 ATTORNEY GENERAL JONATHAN RICH AND DEPUTY ATTORNEY
23 GENERAL JACQUELYN YOUNG ON BEHALF OF DEFENDANTS.

24 **THE COURT:** WANT TO BE HEARD?

25 **MR. RICH:** I'M PREPARED TO SUBMIT, YOUR HONOR. WE
26 RECEIVED YOUR TENTATIVE.

27 **THE COURT:** COUNSEL?

28 **MR. PHILLIPS:** THERE IS ACTUALLY A GREAT DEAL I

1 WOULD LIKE TO SAY.

2 **THE COURT:** SURE.

3 **MR. PHILLIPS:** WE HAVE A LOT TO SAY, AND I HOPE
4 THE COURT WOULD GRANT US LEAVE TO SPEAK FREELY.

5 **THE COURT:** WE'VE GOT SOME TIME.

6 **MR. PHILLIPS:** YEAH. I THINK THERE MAY BE AN
7 EARTHQUAKE DRILL TODAY AT 10:00 O'CLOCK, I HEARD,
8 COUNTY-WIDE. I DON'T THINK THAT WILL AFFECT US BUT --

9 **THE COURT:** IT'S LIKE AN HOUR AND A HALF AWAY.
10 WE'RE NOT GOING TO BE THAT LONG.

11 **MR. PHILLIPS:** WELL, I DIDN'T THINK SO.

12 **THE COURT:** OKAY. GO AHEAD.

13 **MR. RICH:** YOUR HONOR, MAY I SIT?

14 **THE COURT:** PLEASE.

15 **MR. PHILLIPS:** AND MAY I STAND?

16 **THE COURT:** WHATEVER YOU'RE COMFORTABLE.

17 **MR. PHILLIPS:** THE FIRST THING I WAS HOPING TO DO
18 IS SUBMIT TO THE COURT FOR FILING -- I KNOW WE SHOULD BE
19 IN ROOM 102, BUT WE HAVE A REQUEST FOR STATEMENT OF
20 DECISION, AND I KIND OF WANTED TO USE IT AS A GUIDE AS
21 I'M TALKING.

22 IF I COULD HAND IT TO --

23 **THE COURT:** OKAY.

24 HAVE YOU SEEN THIS?

25 **MR. RICH:** YES, AND I OBJECT TO IT, YOUR HONOR.

26 **THE COURT:** I MEAN, IT SOUNDS LIKE HE'S TRYING TO
27 USE IT AS A DEMONSTRATIVE.

28 **MR. RICH:** YES.

1 **THE COURT:** I MEAN, THAT'S NOT -- A STATEMENT OF
2 DECISION IS ONE THING BUT --

3 WHAT IS IT? IS IT LIKE JUST A FEW PAGES?

4 **MR. RICH:** IT'S A REGURGITATION OF THE POINTS HE'S
5 MADE OR ATTEMPTED TO MAKE IN DEMURRER, HIS OPPOSITION TO
6 THE DEMURRER, OPPOSITION TO MOTION TO STRIKE, AND HE'S
7 ASKING THE COURT TO ANSWER SPECIFIC QUESTIONS YES OR NO
8 REGARDING THE SAFETY OF VACCINES, ET CETERA.

9 **THE COURT:** OH, I SEE. I SEE. WELL, YOU SHOULD
10 PROBABLY DO THAT ORALLY BECAUSE WE'VE GOT A COURT
11 REPORTER FOR THAT.

12 **MR. PHILLIPS:** WELL, UNDER 632 OF THE CODE OF
13 CIVIL PROCEDURE, THE PARTIES ARE ALLOWED TO IDENTIFY
14 THOSE ISSUES THAT THEY WANT THE COURT TO MAKE FINDINGS
15 OF FACT AND FINDINGS OF LAW, AND THAT IS SPECIFICALLY
16 WHAT WE'RE HOPING TO DO.

17 AND IF I COULD BEGIN -- MAY I SERVE THIS
18 UPON THE COURT --

19 **THE COURT:** NO, NO. DO IT ORALLY.

20 **MR. PHILLIPS:** ORALLY. THAT'S FINE.

21 OUR FIRST ISSUE, THEN, IS: ARE VACCINES
22 UNSAFE? SOME PEOPLE MAY PHRASE THAT: ARE VACCINES
23 SAFE? WE'RE PHRASING IT IN THE NEGATIVE. ARE THEY
24 UNSAFE? THIS IS THE ENTIRE POINT OF OUR CASE.

25 WE RECOGNIZE THAT MANDATORY VACCINATION IS
26 LAWFUL. THE KIND THAT EXISTED BEFORE SB-277. WHAT
27 SB-277 DOES IS REMOVE THE PERSONAL-BELIEFS EXEMPTION,
28 AND THE PERSONAL-BELIEFS EXEMPTION COVERS RELIGIOUS

1 BELIEFS SINCERELY HELD, LIFESTYLE BELIEFS THAT ARE
2 CONTRARY TO VACCINATION, PEOPLE THAT DON'T WANT TO DO
3 IT.

4 WE THINK THAT CALIFORNIA'S MANDATORY
5 VACCINATION PLAN, THAT IT EXISTED FROM AT LEAST 1960
6 UNTIL PRESENT -- WE THINK THAT WAS LAWFUL BECAUSE
7 PARENTS HAVE A CHANCE TO OPT OUT. AND NOW THAT THERE'S
8 NO CHANCE TO OPT OUT, IT'S OUR ARGUMENT THAT SB-277 --
9 AND NOW CODIFIED AS THE HEALTH AND SAFETY CODE -- IS
10 UNLAWFUL, PER SE, BECAUSE THE STATE IS FORCING KNOWN
11 UNSAFE PRODUCTS ONTO CHILDREN.

12 AND WHAT I FIND KIND OF IRONIC HERE -- BUT
13 I'VE HEARD THE ATTORNEY GENERAL'S OFFICE SAY THAT THERE
14 IS NO PRECEDENT, THERE IS NO STATUTE, THERE IS NO
15 CONTROLLING LAW THAT STANDS FOR THE PROPOSITION THAT THE
16 GOVERNMENT CANNOT MANDATE UNSAFE PRODUCTS. WE THINK
17 THAT IT IS TRUE, THERE IS NO LAW THAT STANDS FOR WHAT
18 WE'RE SAYING. THERE IS NO CASE LAW THAT I'VE FOUND, BUT
19 WE THINK IT'S A CLEAR CONCISE ARGUMENT TO SAY THAT THE
20 STATE CANNOT FORCE UPON OUR CHILDREN PRODUCTS THAT ARE
21 KNOWN TO BE UNSAFE, AND VACCINES, WE KNOW, ARE UNSAFE.

22 THE REASON WE KNOW THAT IS BECAUSE OF THE
23 HOLDING IN THE BRUSOWITZ (PHONETIC) MATTER. BRUSOWITZ
24 IS THE CASE THAT WE BELIEVE IS CONTROLLING. THE HOLDING
25 FROM THE BRUSOWITZ MATTER IS THAT ALL VACCINES ARE
26 UNAVOIDABLY UNSAFE.

27 NOW, THE GOVERNMENT'S POSITION IS THAT
28 VACCINES HAVE NEVER KILLED ANYBODY. VACCINES CANNOT

1 KILL. THEY EVEN MADE A MOTION TO STRIKE AS MANIFESTLY
2 IRRELEVANT -- OR THEY WANT TO EXCISE THE SENTENCE THAT
3 SAYS THAT VACCINES CAN KILL AND MAIM. WELL, THEY DO.
4 AND THERE IS AN ABUNDANCE OF EVIDENCE. THERE'S BEEN
5 \$3.4 BILLION IN PAYOUTS. NOW, THEY SAY WE'RE
6 MISCHARACTERIZING THAT AND TAKING THAT OUT OF CONTEXT,
7 BUT A SUBSTANTIAL PORTION OF THAT DOLLAR AMOUNT HAS GONE
8 TO PEOPLE THAT HAVE BEEN KILLED AND HAVE BEEN MAIMED.
9 THE POINT IS THAT VACCINES DO KILL AND THEY DO MAIM.

10 WHAT HAPPENED IN THE BRUSOWITZ MATTER IS
11 THAT THERE WAS A GAL, HANNAH BRUSOWITZ, THAT HAD
12 SUSTAINED INJURIES FROM A VACCINE, AND THEY HAD GONE
13 THROUGH THE VACCINE COURT AND, AFTER NOT GETTING --
14 EXHAUSTING THEIR ADMINISTRATIVE REMEDIES, IF YOU WILL,
15 IN THE VACCINE COURT, THEY WANTED TO SUE WYETH, THE
16 MAKER OF THE VACCINE.

17 AND WHAT THE SUPREME COURT RULED IN
18 BRUSOWITZ IS THAT THERE CAN BE NO LAWSUIT FOR PATENT --
19 FOR DEFECTIVE PATENT -- OR DEFECTIVE DESIGN, RATHER.
20 THAT IS THE HOLDING. BECAUSE WHAT THE 1986 ACT SAYS --
21 THAT'S THE NATIONAL CHILDHOOD VACCINE INJURY ACT OF
22 1986, AND THAT REMOVES ALL OF THE BASES THAT A PERSON
23 USED TO BE ABLE TO SUE FOR BACK IN THE '80S.

24 NOW, WHAT HAPPENED IN THE '80S WAS THAT TWO
25 OF THE THREE MAJOR DETAP (PHONETIC) PRODUCERS HAD GONE
26 OUT OF BUSINESS. THEY WERE BANKRUPT BECAUSE THEY HAD
27 BEEN SUED AND THEY -- LITERALLY READY TO GO OUT OF
28 BUSINESS. BUT APPARENTLY, THE GOVERNMENT WAS AFRAID

1 THERE WOULD BE A VACCINE SHORTAGE. THIS IS THE EXCUSE
2 THEY GAVE, AND THEY DIDN'T WANT TO SEE ANY MORE VACCINE
3 MAKERS GO OUT OF BUSINESS BECAUSE PEOPLE WERE WINNING AT
4 JURY TRIALS, AND THEY WERE GETTING BIG JUDGMENTS BECAUSE
5 VACCINES ARE UNSAFE AND THEY DO KILL PEOPLE. BUT
6 CONGRESS ESSENTIALLY IMMUNIZED THE VACCINE MAKERS FROM
7 LIABILITY. THAT'S THE WORD SCALIA USES IN THE BRUSOWITZ
8 HOLDING -- THEY HAD BEEN IMMUNIZED.

9 AND WHAT THE 1986 ACT SAYS, WHEN SCALIA
10 TALKS ABOUT IT -- I SHOULD BACK UP A SECOND AND TALK
11 ABOUT PRODUCTS LIABILITY. ACCORDING TO SCALIA, IN THE
12 HOLDING, HE TALKS ABOUT WHAT HE CALLS THE HOLY
13 TRIUMVIRATE OF PRODUCTS LIABILITY, WHICH IS ALLEGED
14 DESIGN DEFECTS, ALLEGED MANUFACTURING DEFECTS, AND
15 LABELING DEFECTS. AND, OF COURSE, LABELING COMES IN TWO
16 HEMISPHERES. THERE IS FAILURE TO WARN, AND FAILURE TO
17 GIVE PROPER INSTRUCTIONS. BUT THOSE BASIC THREE IDEAS
18 OF THE DESIGN, THEN THE MANUFACTURING, AND THE LABELING
19 OF A PRODUCT.

20 WELL, THE 1986 ACT SPECIFICALLY SAYS, WITH
21 REGARD TO MANUFACTURING, THAT, IF A PERSON EXHAUSTS
22 THEIR ADMINISTRATIVE REMEDY, THEY COULD GO ON AND SUE,
23 BUT NOBODY EVER HAS IN 30 YEARS. THE LAW IS 30 YEARS
24 OLD LITERALLY THIS MONTH, AND NOBODY HAS EVER BEEN ABLE
25 TO SUE A VACCINE MAKER ON THE ISSUE OF MANUFACTURING
26 BECAUSE ALL OF THE PAPERWORK IS HELD BY THE FDA.

27 AND WHEN THEY GO TO THE VACCINE COURT -- I
28 MAY BE GETTING AHEAD OF MYSELF -- THE VACCINE COURT,

1 THERE IS NO FEDERAL RULES OF CIVIL PROCEDURE. THERE IS
2 NO JUDGE. THERE'S WHAT'S CALLED A SPECIAL MASTER, AND
3 THE SPECIAL MASTER IS NOT A LAWYER. THERE IS NO
4 EVIDENCE. THERE'S NO WITNESSES. THERE'S NO JURY
5 TRIALS. THERE'S NO INTERROGATORIES. THERE'S NO
6 DISCOVERY OF ANY KIND.

7 SO AS A PRACTICAL MATTER, NO ONE WILL EVER
8 BE ABLE TO FIND OUT IF THERE IS A BASIS TO SUSPECT A
9 MANUFACTURING DEFECT. SO ESSENTIALLY, THE IDEA OF SUING
10 FOR -- SUING AN ACTUAL VACCINE MAKER FOR A MANUFACTURING
11 DEFECT IS, FOR ALL INTENTS AND PURPOSES, IMPOSSIBLE.
12 AND THEY'VE CREATED IT THAT WAY, WE BELIEVE, BECAUSE
13 VACCINES ARE UNSAFE. AND IF PEOPLE WERE ABLE TO, YOU
14 KNOW, HAVE A FUTURE TRIAL AND HAVE EVIDENCE, THEY WOULD
15 KNOW THAT VACCINES ARE UNSAFE.

16 THE NEXT ISSUE ON A PRODUCTS LIABILITY IS
17 THE IDEA OF LABELING. WELL, IN ORDER TO ENJOY THE
18 BENEFITS OF THE 1986 ACT, THE ONLY THING A VACCINE
19 MANUFACTURER HAS TO DO IS LIST SOMETHING LIKE SUDDEN
20 INFANT DEATH SYNDROME, AND THEY'RE OFF THE HOOK. THEY
21 SAY "AUTISM" ON THE VACCINE INSERTS. AUTISM IS
22 SOMETHING THEY WARN ABOUT ON THESE VACCINES. DEATH IS
23 SOMETHING THEY WARN ABOUT. THIS IS ON ALL THE POSSIBLE
24 SIDE-EFFECTS.

25 BUT IN A SORT OF KAFKAESQUE, YOU KNOW,
26 ORWELLIAN WORLD, WHAT DO THESE WARNINGS MEAN WHEN THEY
27 SAY, "POSSIBLE SIDE EFFECTS INCLUDE" AND IT'S A MILE
28 LONG -- THESE POSSIBLE SIDE EFFECTS? APPARENTLY, THEY

1 MEAN NOTHING BECAUSE THE ONLY PURPOSE OF HAVING THE
2 ADMONITION, THE WARNING, IS SOLELY TO GET THE VACCINE
3 MAKER OFF THE HOOK.

4 AND SO THERE HAS NEVER BEEN A CASE WHERE A
5 PLAINTIFF HAS EXHAUSTED THEIR ADMINISTRATIVE REMEDIES IN
6 THE VACCINE COURT AND THEN GONE ON TO SUE FOR LABELING
7 DEFECT. SO THERE'S NEVER BEEN A MANUFACTURING DEFECT
8 CLAIM ACTUALLY AGAINST A MAKER. THERE'S NEVER BEEN ONE
9 FOR FAILURE TO WARN AND GIVE PROPER INSTRUCTIONS.

10 WELL, IN 2011, THE BRUSOWITZES WANTED TO
11 EXHAUST THEIR ADMINISTRATIVE REMEDIES IN THE VACCINE
12 COURT AND THEN SUE IN A PENNSYLVANIA STATE COURT UNDER A
13 TRADITIONAL PRODUCTS LIABILITY THEORY. WELL, THEY
14 CLOSED THE DOOR, AND THEY SAID THAT THE 1986 ACT, FIRST
15 OF ALL, IS SILENT AS TO THIS IDEA OF WHETHER OR NOT A
16 PERSON CAN SUE FOR DESIGN DEFECT.

17 IT'S CURIOUS. IT'S A VERY POORLY WRITTEN
18 LAW, AND I'M NOT JUST SAYING THAT BECAUSE I DISAGREE
19 WITH THE SUBSTANCE. IT'S A CONFUSING LAW BECAUSE IT
20 ONLY MENTIONS THOSE TWO TYPES OF LIABILITY FOR
21 MANUFACTURING AND FOR LABELING, BUT IT'S SILENT AS TO
22 DESIGN. SO SPECTATORS WERE WONDERING IN 2011 HOW WOULD
23 THEY RESOLVE THIS CASE.

24 WELL, WHAT JUSTICE SCALIA SAID IS, LOOKING
25 AT ONE OF THE HEADINGS, IT'S -- THERE'S -- IN THE LAW OF
26 THE 1986 ACT, THE HEADING READS:

27 UNAVOIDABLE ADVERSE SIDE
28 EFFECTS.

1 AND THAT IS WHERE THE LANGUAGE COMES
2 FROM -- "UNAVOIDABLY UNSAFE." MY COLLEAGUES ARE
3 CORRECT. WE'VE ARGUED ABOUT THIS, BUT THEY MAKE THE
4 POINT THAT THE BRUSOWITZ DECISION NEVER SAYS VACCINES
5 ARE UNAVOIDABLY UNSAFE. AND THAT'S TRUE. IT NEVER SAYS
6 THAT. SO WHY ARE WE HERE SAYING THAT VACCINES ARE
7 UNAVOIDABLY UNSAFE? WELL, WE COULD USE THE MORE -- WE
8 COULD SAY THE LANGUAGE "UNAVOIDABLE ADVERSE SIDE
9 EFFECTS," BUT IN COMMON PARLANCE WE'RE SAYING
10 "UNAVOIDABLY UNSAFE."

11 THIS IS WHERE THE DOCTRINE COMES FROM.
12 "UNAVOIDABLY UNSAFE" THE WAY JUSTICE SCALIA DESCRIBES
13 IT, HE SAYS THAT IF IT'S "BEYOND THE SCOPE OF CONTROL OF
14 VACCINE MAKER, IF THEY JUST CAN'T HELP IT, THEN THEY'RE
15 OFF THE HOOK FOR LIABILITY." BUT THIS REALLY TURNS
16 PRODUCTS LIABILITY ON ITS HEAD BECAUSE TRADITIONALLY,
17 WITH THINGS LIKE TNT, OR NITROGLYCERIN, YOU KNOW,
18 PURVEYORS OR PEOPLE THAT ARE USING IT FOR MINING
19 OPERATIONS, WE'VE HAD LAWS REGARDING INHERENTLY
20 DANGEROUS PRODUCTS FOR OVER A HUNDRED YEARS.

21 AND THE THEORY IS THIS: IF A PRODUCT IS
22 INHERENTLY DANGEROUS, WHAT WE SAY IS, WELL, I GUESS IT'S
23 BEYOND THE SCOPE OF YOUR CONTROL NO MATTER HOW SAFE YOU
24 MAKE THE NITRO, NO MATTER HOW SAFE YOU MAKE THE TNT, IT
25 MAY BLOW UP. BUT IF IT HAPPENS, THERE'S STRICT
26 LIABILITY. YOU'RE IN THE BUSINESS OF DOING THIS SO YOU
27 HAVE TO PAY FOR IT.

28 WELL, THE 1986 ACT TURNS THAT ON ITS HEAD,

1 AND INSTEAD OF SAYING "INHERENTLY DANGEROUS," THEY USE
2 THIS TERM "UNAVOIDABLY UNSAFE." AND SO SCALIA, IN A
3 KIND OF -- IT'S A VERY TORTURED REASONING, BUT THE
4 ARGUMENT GOES: THERE ARE SIDE EFFECTS THAT ARE
5 UNAVOIDABLY UNSAFE, AND YOU JUST CAN'T HELP IT. IT'S
6 JUST BEYOND THE SCOPE. SOME PEOPLE ARE GOING TO DIE.
7 SOME PEOPLE WILL BE PARALYZED. SOME PEOPLE WILL GET ALL
8 SORTS OF -- WHATEVER THEY GET FROM THE VACCINE, AND YOU
9 JUST CAN'T HELP IT, AND THEREFORE, WE'RE GOING TO LET
10 THEM OFF THE HOOK FOR LIABILITY.

11 AND TO ME, I KNOW WE'RE NOT PUTTING THAT
12 ACT -- IT'S NOT ON TRIAL RIGHT NOW, BUT THIS UNDERSCORES
13 THE POINT THAT VACCINES ARE INDEED DANGEROUS, AND WE
14 THINK THAT IS THE CENTRAL ARGUMENT OF OUR CASE. AND I
15 MAY DIGRESS A LITTLE BIT HERE, BUT IN MY PERSONAL LIFE,
16 TO THE EXTENT THAT'S RELEVANT, I DO PROSELYTIZE A LOT
17 AND TALK ABOUT VACCINES. I'M VERY OPPOSED TO VACCINES.

18 AND WHEN I TALK TO PEOPLE ABOUT THIS, AND I
19 HOPEFULLY TRY TO DISCOURAGE THEM, I MENTION THE FACT
20 THAT YOU CANNOT SUE A VACCINE MAKER, THAT IT'S
21 ABSOLUTELY IMPOSSIBILITY. IF AN S.U.V. WERE TO ROLL
22 OVER, YOU COULD SUE FORD OR CHEVY, BUT IF THE VACCINE
23 ROLLS OVER, YOU CAN'T SUE JUST BECAUSE.

24 AND WE SUBMIT THE REASON IS BECAUSE THEY
25 ARE UNAVOIDABLY UNSAFE OR, IF WE USE THE EXACT LANGUAGE,
26 THEY ALL COME WITH UNAVOIDABLE ADVERSE SIDE EFFECTS.
27 AND WE BELIEVE THAT IT IS WRONG AND THE STATE CANNOT, AS
28 A MATTER OF PRINCIPLE -- IT IS ILLEGAL FOR A STATE TO

1 FORCE UPON CHILDREN PRODUCTS THAT HAVE UNAVOIDABLE
2 ADVERSE SIDE EFFECTS.

3 THE ANALOGY I MAKE SO OFTEN IS WITH SEAT
4 BELT LAWS AND HELMET LAWS. THERE ARE LAWS THAT YOU HAVE
5 TO WEAR A HELMET IF YOU'RE ON A MOTORCYCLE, AND A
6 SEATBELT AND SO FORTH. SOME PEOPLE DON'T WANT TO DO
7 THAT. THEY BELIEVE THEY HAVE A LIBERTY INTEREST, BUT
8 THE TRUTH IS A SEATBELT CAN'T HARM YOU IN AND IT OF
9 ITSELF. I MEAN, IT MAY MALFUNCTION, BUT THE SEATBELT
10 ITSELF IS NOT DANGEROUS. SAME THING WITH THE HELMET.
11 IT'S NOT LIKE THERE'S CHEMICALS THAT WILL LEACH INTO THE
12 BODY AND COME OUT OF THE HELMET AND SO FORTH.

13 SO OUR ARGUMENT IS ESSENTIALLY THAT ALL
14 VACCINES ARE UNAVOIDABLY UNSAFE, AND WE WISH TO RESTORE
15 THE PERSONAL-BELIEFS EXEMPTION BECAUSE ALL PARENTS
16 SHOULD HAVE A RIGHT TO OPT OUT.

17 AND SO WE'RE HOPING THAT THE COURT WILL
18 ANSWER WHAT WE BELIEVE OR HOW WE FRAME THE ISSUE: ARE
19 VACCINES UNSAFE? AND YES, MR. RICH IS CORRECT. I DO
20 HAVE A SMALL NARRATIVE THAT IS PERSUASIVE. I PUT IT IN
21 PARENTHESES, HOPEFULLY TO SET IT OFF FROM OUR PRINCIPAL
22 QUESTION.

23 NO. TWO, OUR SECOND ISSUE IS: DO THE
24 GOVERNMENT PUBLICATIONS -- DO THEY RISE TO THE LEVEL OF
25 COMMON KNOWLEDGE, BECAUSE THE GOVERNMENT SAYS, THAT,
26 WELL, VACCINES ARE TOTALLY SAFE, AND HERE'S THE PROOF.
27 AND AS PROOF OF HOW SAFE THEY ARE, THEY HAVE A BUNCH OF
28 DOCUMENTS FROM THE GOVERNMENT, AND THE GOVERNMENT

1 DOCUMENTS MAY BE PERSUASIVE, BUT WE DON'T THINK THAT
2 THEY RISE TO THE LEVEL OF COMMON KNOWLEDGE. WE THINK
3 THE COMMON KNOWLEDGE IS THAT WHICH IS HELD BY THE
4 PEOPLE.

5 AND THE TEST UNDER 452G HAS ALWAYS BEEN
6 WHETHER A PROPOSITION IS SUBJECT TO REASONABLE DISPUTE,
7 AND AGAIN, WHILE IT MAY BE AUTHORITATIVE SOURCE, THERE'S
8 PLENTY TO DISPUTE IN ALL THESE GOVERNMENT DOCUMENTS.

9 THE PRINCIPAL ONE IS THE IDEA OF THIS OUTBREAK IN
10 DISNEYLAND WHERE THEY TALK ABOUT THE UNVACCINATED PEOPLE
11 THAT ARE SPREADING MEASLES AND SO FORTH, THE GOVERNMENT
12 DOCUMENTS THEY PRESENT FROM THE WORLD HEALTH
13 ORGANIZATION THAT SAYS UNVACCINATED PUT OTHER PEOPLE AT
14 RISK.

15 WE WOULD LIKE TO HAVE A CHANCE. I AM VERY
16 ANXIOUS TO CROSS-EXAMINE SOME OF THESE EXPERTS. WE
17 BELIEVE THAT THE COURT SHOULD TAKE TESTIMONY AND LET US
18 HAVE A CHANCE TO CROSS-EXAMINE SOME OF THESE PEOPLE THAT
19 ARE SAYING THAT THE UNVACCINATED PUT EVERYONE ELSE AT
20 RISK.

21 AND IF I COULD JUST STOP FOR A SECOND HERE,
22 THIS HAS TO BE THE QUESTION FOR THE AGES BECAUSE, IF YOU
23 HAVE A SCHOOL THAT HAS 95 PERCENT OF THE PEOPLE ALREADY
24 VACCINATED, WHAT HARM CAN AN UNVACCINATED PERSON DO TO A
25 VACCINATED PERSON? AND THERE'S RHETORIC ALL THROUGHOUT
26 THESE -- THE WORLD HEALTH ORGANIZATION, THE C.D.C., THAT
27 KEEP TALKING ABOUT HOW THE UNVACCINATED ARE THE ONES
28 PROPAGATING THESE DISEASES. THE UNVACCINATED -- IT

1 CIRCULATES THROUGH THEM, AND THE UNVACCINATED ARE
2 PUTTING EVERYONE AT RISK.

3 WELL, IF A PERSON IS VACCINATED, THEY
4 SHOULD HAVE THE DISEASE-FIGHTING FORCE FIELD IN EFFECT
5 AND IT SHOULD BE IRRELEVANT WHETHER OR NOT ANYBODY ELSE
6 IS VACCINATED. WHEN THE GOVERNMENT IS SAYING THAT THE
7 UNVACCINATED IS PUTTING THE VACCINATED AT RISK, IT'S
8 JUST A SCATHING INDICTMENT OF THE EFFICACIOUSNESS OF THE
9 VACCINES. IT'S SAYING IT DOESN'T WORK.

10 AND WE'VE HAD A LOT OF CHANCE TO TALK --
11 MR. RICH AND I -- AND WE HAVE TALKED ABOUT THIS AND
12 WE'VE ARGUED ABOUT IT, AND I'VE ASKED SEVERAL TIMES.
13 I'VE ASKED MANY DOCTORS. I'VE TRIED TO ASK HEALTH
14 OFFICIALS: HOW IS IT THAT A PERSON WHO IS UNVACCINATED
15 PUTS A VACCINATED PERSON AT RISK?

16 THOSE OF US WITH CHILDREN WHO HAVE BEEN
17 THROUGH THE PEDIATRIC SITUATION, WE HAVE THESE DOCTORS
18 THAT WILL TELL THE PARENTS THAT, WELL, THE UNVACCINATED
19 ARE THE PROBLEMS, AND THEY'RE THE ONES PUTTING EVERYONE
20 AT RISK AND THEY'RE CAUSING THE PROBLEMS. YOU KNOW, IF
21 THESE VACCINES REALLY WORKED LIKE THEY CLAIM THAT THEY
22 DID, WELL THEN, IT SHOULD BE NO PROBLEM. IF A PERSON
23 GETS VACCINATED, THEY SHOULD BE PROTECTED. AND THAT'S
24 THE WAY THE HISTORY OF IMMUNOLOGY HAS ALWAYS GONE.

25 IF WE LOOK BACK THROUGH THE DAYS -- IF THE
26 COURT WILL GRANT ME LEAVE TO SPEAK FREELY, I WOULD LIKE
27 TO GO INTO A LITTLE BIT OF THE HISTORY OF SMALLPOX
28 BECAUSE THAT'S WHERE ALL THIS ORIGINATES.

1 WHAT HAPPENED, SMALLPOX IS THE BIGGEST
2 KILLER OF HUMAN BEINGS EVER. MORE PEOPLE HAVE DIED FROM
3 SMALLPOX THAN ANYTHING ELSE. AND ALL THROUGHOUT HISTORY
4 IT'S BEEN LIFE'S GREAT LOTTERY, WORRYING ABOUT GETTING
5 SMALLPOX. IF A PERSON WERE LIVING IN ANY AMERICAN TOWN
6 THROUGHOUT THE 1600S, 1700S, 1800S, UP BASICALLY TO JUST
7 BEFORE WORLD WAR II, EVERY TEN YEARS OR SO, IF YOU'RE
8 LIVING IN BOSTON, NEW YORK CITY, BALTIMORE, ANY OF THESE
9 PLACES, EVERY TEN YEARS OR SO, A SMALLPOX EPIDEMIC WOULD
10 COME AND WIPE OUT 20, 30 PERCENT OF THE TOWN. AND
11 USUALLY CHILDREN.

12 AND IT WAS, AGAIN, THE MOST DEADLY, DEADLY
13 DISEASE EVER, AND PEOPLE WERE ALWAYS AWARE OF SMALLPOX
14 BECAUSE SMALLPOX, IF YOU SURVIVED, YOU WOULD HAVE
15 HORRIBLE UGLY SCARS, TYPICALLY ON THE FACE BECAUSE
16 SMALLPOX FORMS PUSTULES ALL OVER THE BODY -- THE CHEST,
17 THE FACE, THE HANDS, THE NECK, AND SO FORTH -- AND A
18 PERSON IS SCARRED FOR LIFE.

19 THE POINT IS, IF YOU WERE UNLUCKY ENOUGH TO
20 GET SMALLPOX, CHANCES ARE A PERSON WOULD DIE. THOSE WHO
21 DIDN'T DIE WOULD BE STIGMATIZED AND BASICALLY UGLY FOR
22 THE REST OF THEIR LIVES. IT WAS A HORRIBLE, HORRIBLE
23 THING. BUT IN THE 1700'S WESTERN MEDICINE DISCOVERED
24 THAT IN PLACES LIKE AFRICA AND IN THE MIDDLE EAST THEY
25 WERE DOING WHAT IS CALLED VARIOLATION. WHAT THEY WOULD
26 DO -- REMEMBER, EVERYBODY'S TERRIFIED OF SMALLPOX ALL
27 THE TIME. BUT THEY HAD LEARNED A PROCEDURE.

28 WHEN THE EUROPEANS FIRST LEARNED ABOUT IT,

1 THEY ASKED THE PEOPLE IN THE MIDDLE EAST AND SO FORTH
2 WHERE THIS PROCEDURE CAME FROM, AND NOBODY KNEW BECAUSE
3 IT HAD BEEN PRACTICED FOR SO MANY YEARS. WHAT THEY
4 WOULD DO TO THWART SMALLPOX IS THEY WOULD PUT A SMALL
5 SCRATCH ON SOMEBODY'S ARM, ENOUGH TO DRAW BLOOD, AND
6 THEY WOULD TAKE WHAT THEY CALLED "MORBID MATTER."

7 "MORBID MATTER" IS PUS FROM THE PUSTULE OF A SMALLPOX
8 VICTIM, AND THEY WOULD TAKE THE PUS AND THEY WOULD
9 LITERALLY RUB IT INTO THE CUT, AND THE PERSON WOULD GET
10 A CASE OF SMALLPOX. THEY WOULD ACTUALLY BECOME SICK.
11 THEY WOULD HAVE A FEVER, THEY WOULD HAVE A RASH, THEY
12 WOULD BE OUT OF COMMISSION. THEY WOULD BE IN BED FOR
13 TEN TO TWELVE DAYS.

14 BUT ONCE THEY RECOVERED, THEY WOULD BE
15 IMMUNE FOR LIFE, BECAUSE THE PURPOSE OF IMMUNIZATION IS,
16 IF SOMEBODY DEVELOPS A FULL-BLOWN ORGANIC CASE OF THE
17 DISEASE, THEY WILL FOREVER BE PROTECTED WITH
18 IMMUNIZATION. AND THAT IS THE PRINCIPAL UPON WHICH
19 VACCINATION IS SUPPOSED TO BE -- IS SUPPOSED TO HAPPEN.
20 IT DOESN'T REALLY HAPPEN MODERNLY. BUT WITH THE IDEA
21 OF -- AGAIN, IT'S CALLED "VARIOLATION," THIS IDEA OF
22 SCRATCHING SOMEBODY AND THEN PUTTING THE PUS IN FROM THE
23 SMALLPOX. "VARIOLATION" COMES FROM THE WORD "VARIOLA,"
24 WHICH IS THE NAME OF THE VIRUS.

25 NOW, WHAT HAPPENED AFTER A HUNDRED OR SO
26 YEARS OF DOING THIS IN EUROPE, THEY NOTICED THAT MILK
27 MAIDS NEVER GOT SMALLPOX. AND THIS WAS SIGNIFICANT. IF
28 THE COURT IS FAMILIAR WITH SOME OF THE STORIES AND THE

1 LORE OF THE MILKMAID AND THE PERFECT COMPLEXION AND THE
2 IDEALISTIC BEAUTY, IT'S BECAUSE MILKMAIDS NEVER GOT
3 SMALLPOX.

4 AND PEOPLE NOTICED THIS. IT'S NOT JUST
5 ANECDOTALLY BECAUSE EVERYBODY'S WORRIED ABOUT SMALLPOX
6 ALL THE TIME. AND HOW WAS IT THAT THESE MILKMAIDS NEVER
7 GOT SMALLPOX? WELL, AS IT TURNED OUT, IT'S VERY COMMON
8 FOR -- ON THE UDDERS OF A COW -- FOR THEM TO DEVELOP
9 COWPOX. IF A PERSON GETS A SCRATCH ON THEIR HAND FROM A
10 THISTLE OR A METAL PAIL AND THEY'RE MILKING THE COWS,
11 THEN THE VIRUS CAN JUMP FROM THE COW -- THE COWPOX --
12 AND INFECT THE PERSON.

13 IF A PERSON GETS COWPOX, IT'S NOT LETHAL.
14 SMALLPOX IS LETHAL, COWPOX IS NOT. BUT IN 1796 THERE
15 WAS A FAMOUS DOCTOR, EDWARD JENNER, WHO CONDUCTED AN
16 EXPERIMENT AND WAS ABLE TO PROVE THAT, IF YOU PURPOSELY
17 GIVE SOMEONE COWPOX, THEY WILL DEVELOP A FEVER AND A
18 RASH OVER SEVEN DAYS, BUT IT'S NONLETHAL, AND THEY WILL
19 BE IMMUNE FOREVER FROM GETTING SMALLPOX.

20 AND SO, AGAIN, WHEN THEY USED TO DO THE
21 VARIOLATION, WHEN THEY USED TO GIVE PEOPLE THE SMALLPOX
22 WITH THE HOPE OF GETTING SMALLPOX, IT WOULD BACKFIRE
23 BECAUSE THERE WAS PROBABLY A 3 PERCENT DEATH RATE IF
24 PEOPLE CHOSE TO BE VARIOLATED TO GET THE VIRUS ON
25 PURPOSE. AND PEOPLE WERE FLOCKING TO DO IT BECAUSE,
26 AGAIN, THIS WAS LIFE'S GREAT LOTTERY. BUT AS SOON AS
27 THEY REALIZED YOU COULD USE COWPOX INSTEAD, WHICH IS
28 NEVER LETHAL, THAT'S WHERE VACCINATION COMES FROM.

1 THE WORD "VACCINATION" -- V-A-C-C-A IS A
2 LATIN ROOT. "VACCA," THAT MEANS COW. IN SPANISH
3 "VACCA" MEANS COW ALSO. THE POINT OF VACCINATION IS
4 THAT, IF YOU GIVE A PERSON COWPOX, THEY WILL DEVELOP THE
5 DISEASE AND THEY WILL NEVER GET SICK AGAIN.

6 AND THE REASON I'M SAYING ALL THIS HERE IS
7 BECAUSE WE DON'T SEE ANY OF THIS GOING ON WITH THE
8 MODERN VACCINES. WHAT WE'RE SEEING IS THINGS LIKE
9 BOOSTER SHOTS WHERE THEY CALL FOR INNUMERABLE BOOSTER
10 SHOTS, AND WE THINK THAT THE BOOSTER SHOTS ARE (A),
11 THEY'RE A HOAX, BUT ALSO THEY'RE UNNECESSARY. THEY
12 CREATE UNNECESSARY RISK BECAUSE THE LESSONS OF
13 IMMUNOLOGY THAT WE'VE LEARNED IS THAT, ONCE A PERSON
14 DEVELOPS A DISEASE, THEY SHOULD NEVER GET IT AGAIN.

15 AND SO THERE SHOULD BE NO REASON, IF YOU
16 GET A MEASLES SHOT, YOU SHOULD NEVER HAVE TO WORRY ABOUT
17 IT AGAIN. IF SOMEONE HAD A MEASLES VIRUS IMPLANTED IN
18 THEIR SHOULDER, IN THE DELTOID MUSCLE, THEY SHOULD
19 DEVELOP THE DISEASE AND GET SICK AND, HENCE, HAVE
20 IMMUNITY. BUT WE'RE NOT SEEING THAT.

21 WHAT HAPPENED IN THE MEASLES OUTBREAK OF
22 2015, DEPENDING WHO YOU BELIEVE, THEY SAY THERE WAS
23 PROBABLY 40 PEOPLE. I'VE SEEN A REPORT THERE WAS 131
24 PEOPLE. THE MOST RELIABLE SOURCE FROM THE C.D.C. SAYS
25 THERE WAS 131 CONFIRMED CASES OF MEASLES. WELL, THE
26 QUESTION IS HOW DO YOU CONFIRM A CASE OF MEASLES? WITH
27 A BLOOD TEST. AND YOU IDENTIFY THE VIRUS.

28 AND SO WHAT I WOULD LIKE TO KNOW IS WHAT

1 KINDS OF MEASLES VIRUS ARE THESE PEOPLE INFECTED WITH?
2 IF WE HAD AN OPPORTUNITY TO CROSS-EXAMINE, WE WOULD FIND
3 OUT THAT -- I'M CERTAIN OF IT -- THE TYPE OF MEASLES
4 THAT WAS INVOLVED IN THIS 2015 OUTBREAK WAS A LABORATORY
5 STRAIN, THAT THE WILD MEASLES IS COMPLETELY DIFFERENT
6 THAN THE LABORATORY STRAIN.

7 WHAT A LABORATORY STRAIN OF MEASLES IS IS
8 WHEN THEY ATTENUATE OR WEAKEN THE VIRUS. AND WHAT I
9 MEAN BY "ATTENUATING OR WEAKENING" IT IS THEY SLOW DOWN
10 ITS ABILITY TO REPLICATE. SO IF YOU HAVE THE MEASLES
11 VIRUS IN YOU, YOU CAN DEVELOP THE MEASLES. MY OPPONENTS
12 TOTALLY SAY THAT'S FALSE, BUT I KNOW IT'S TRUE. BECAUSE
13 THE POINT IS, IF YOU DON'T HAVE THE MEASLES VIRUS AND
14 YOU'RE GIVEN THE MEASLES VIRUS, YOU MOST CERTAINLY CAN
15 GET IT.

16 NOW, WHAT THEY'RE DOING IS THEY'RE GIVING
17 AN ATTENUATED THAT DOESN'T REPLICATE AS QUICKLY.
18 THEY'RE DOING THAT TO MIMMICK THE MAGIC, IF YOU WILL, OF
19 THE COWPOX VIRUS IN RELATION TO THE VARIOLATION. THEY
20 FIGURE THE COWPOX VIRUS IS A MILDER FORM OF WHAT
21 SMALLPOX WOULD BE. THEY ARE PART OF THE SAME FAMILY OF
22 VIRUSES.

23 AND SO WHAT THEY'RE DOING WITH MEASLES IS
24 TRYING TO ATTENUATE IT. BUT IF THEY WERE CONFIRMING
25 CASES, WE SHOULD BE ABLE TO KNOW WHAT IS THE STRAIN.
26 AND ONCE PEOPLE REALIZE THAT THE STRAIN IS -- I'M
27 CERTAIN IT'S A LABORATORY STRAIN -- IT'S THE VACCINATION
28 THAT IS CAUSING THE SPREAD OF THE DISEASE.

1 IF A PERSON WERE TO LOOK AT THE INSERT FOR
2 ANY -- FOR THE MEASLES VACCINE -- IT'S ACTUALLY THE
3 M.M.R. -- IT TELLS A PERSON YOU CAN SHED FOR 28 DAYS.
4 OF COURSE, THEY USE THE WORD "SHED" BECAUSE THEY DO NOT
5 WANT TO USE -- IT'S A EUPHEMISM. THE POINT IS YOU'RE
6 INFECTIOUS FOR 28 DAYS. IF YOU HAVE THE MEASLES VIRUS
7 IN YOU, YOU CAN GIVE IT TO OTHERS. AND IF THEY -- IF
8 IT'S A WILD MEASLES STRAIN YOU CONTRACT, YOU CAN GIVE IT
9 TO SOMEONE ELSE. IF YOU'RE INJECTED WITH THE MEASLES
10 VIRUS, YOU CAN CERTAINLY GIVE IT TO SOMEONE ELSE. AND
11 WHAT IT SHOWS TO US IS THAT THE VACCINES AREN'T REALLY
12 WORKING. THEY ARE THE PROBLEM. THEY ARE CAUSING THIS
13 CONTINUATION OF THE MEASLES VIRUS.

14 IT'S BEEN SAID -- THERE IS A PROMINENT
15 DOCTOR. WE'VE QUOTED HER HERE. THE RUSSIAN DOCTOR,
16 TATIANA OVOKANICH (PHONETIC), WHO SAYS THAT MEASLES
17 TODAY IS A DISEASE OF VACCINATED PERSONS. IF WE WERE TO
18 TAKE A HUNDRED PEOPLE HERE, I WOULD BET THAT 95 PERCENT
19 OF THEM HAVE BEEN VACCINATED FOR MEASLES. AND YET, THE
20 POINT IS THAT IT'S NOT THE UNVACCINATED THAT ARE CAUSING
21 THE PROBLEM. WE BELIEVE IT'S THOSE THAT ARE VACCINATED.

22 BUT THE GOVERNMENT DOCUMENTS THAT THEY
23 SUPPLY ARE JUST COMPLETELY SILENT ON POINT. IT'S
24 NOTHING MORE THAN PROPAGANDA, NOTHING MORE, WE BELIEVE,
25 THAN AN ADVERTISEMENT FOR THE NATIONAL VACCINE INDUSTRY.
26 VACCINES ARE SAFE, THE SKY IS BLUE, THE EARTH IS
27 ROUND -- IT'S JUST THIS PABLUM THAT THEY SAY OVER AND
28 OVER AND OVER. AND NOBODY EVER SUBJECTS IT TO EVEN THE

1 MILDEST FORM OF SCRUTINY OR THE MILDEST QUESTIONS.

2 YOU KNOW, IN READING THROUGH THE
3 LITERATURE, FOR EXAMPLE, THE C.D.C. WARNS AGAINST
4 GETTING MORE THAN ONE VIRUS AT A TIME -- A LIVE VIRUS IN
5 THE COURSE OF VACCINE. AND THAT ONLY MAKES SENSE
6 BECAUSE, IF YOU'RE GETTING A MEASLES VIRUS AND THE
7 RUBELLA VIRUS AND THE VARICELLA VIRUS, WHICH IS
8 CHICKENPOX, THAT'S GOES TO CONFUSE THE BODY. BUT YET WE
9 SEE IT ALL THE TIME. THE CHILDREN ARE GETTING INJECTED
10 WITH MULTIPLE VIRUSES.

11 AND FORGETTING THE VIRUSES FOR A MOMENT,
12 THE REASON I BROUGHT UP THE SITUATION WITH THE
13 VARIOLATION AND THE COWPOX, THE TRUE VACCINATION, IS
14 THAT IN ALL THOSE CASES FROM THE 1922 CASE, THE 1905
15 CASE, THEY DON'T INVOLVE A NEEDLE, A HYPODERMIC NEEDLE.
16 THERE IS NO PLUNGER. THERE IS NOT WHAT WE THINK ABOUT
17 AS SHOTS. THAT SIMPLY DIDN'T HAPPEN BACK THEN.

18 BACK IN THE DAY, THE PERSON ONLY GOT THE
19 VIRUS, AND THAT'S ALL THEY WERE EXPOSED TO. BUT TODAY,
20 INSIDE THE VACCINES, THEY HAVE ALUMINUM. THEY HAVE
21 MERCURY INSIDE THE VACCINES. THEY HAVE POLYSORBATE 80.
22 THEY HAVE M.S.G. THERE IS THIS LIST UPON CHEMICALS UPON
23 CHEMICALS UPON CHEMICALS. THERE IS NO COMPETENT
24 EVIDENCE. THERE IS NO STUDIES THAT EVER EXPLAIN THE
25 PHYSIOLOGICAL EFFECTS.

26 NOW, I KNOW THE EFFECTS OF FORMALDEHYDE ON
27 THE BODY. THE QUESTION IS WHY IS FORMALDEHYDE IN THE
28 VACCINE. WE THINK THAT'S DANGEROUS. THE COURT MAY HAVE

1 SEEN THE 60 MINUTE SPECIAL. IT WAS ON RECENTLY ABOUT
2 THE FLOORING MADE IN CHINA. IT HAD FORMALDEHYDE IN IT.
3 THEY HAD TO RECALL IT BECAUSE FORMALDEHYDE IS SO BAD.
4 WELL, IF IT'S SO BAD, WHY ARE WE INJECTING IT DIRECTLY
5 INTO A CHILD'S THIGH MUSCLE?

6 THE SAME THING -- I THINK I BROUGHT UP A
7 POINT LAST WEEK. IF A PERSON WERE TO BREAK ONE OF THE
8 CURLY Q LIGHT BULBS, THE ENERGY SAVER LIGHT BULBS --
9 THEY HAVE MERCURY IN THEM. IT HELPS LIGHT UP THE LIGHT
10 BULB. BUT IF YOU WERE TO BREAK ONE, THE C.D.C.
11 RECOMMENDS YOU'VE HAVE TO GET A HEPPA VAC (PHONETIC) AND
12 OPEN THE WINDOWS AND CLEAN IT UP, AND THAT'S BECAUSE
13 THERE ARE 12 PARTS PER BILLION, EXPRESSED 12 P.P.B. IN
14 THE AMBIENT AIR, AND THAT'S CONSIDERED DANGEROUS, BUT
15 YET IN A SHOT THEY CAN PUT 50,000 PARTS PER BILLION
16 DIRECTLY INSIDE OF A CHILD'S THIGH MUSCLE.

17 AND I WOULD LIKE THE OPPORTUNITY TO
18 CROSS-EXAMINE ONE OF THEIR EXPERTS, ONE OF THEIR
19 DOCTORS, PERHAPS KAREN SMITH, AND SAY, "WHAT
20 PHYSIOLOGICAL EFFECT, IF ANY, DOES MERCURY HAVE IN A
21 CHILD'S THIGH MUSCLE?" WE KNOW THERE IS A ZERO-POINT
22 THRESHOLD FOR MERCURY, AND YET THEY'RE INJECTING
23 CHILDREN WITH MERCURY. THAT IS UNSAFE, PER SE, AND WE
24 REALLY WOULD LIKE TO HAVE THE OPPORTUNITY, RESPECTFULLY,
25 TO HAVE SOME OF THESE ISSUES BROUGHT OUT.

26 BECAUSE BASED ON THE DOCUMENTS THEY HAVE
27 SUBMITTED, IT'S ONLY ROTE CONCLUSIONS. IT'S HEARSAY.
28 THESE ARE NAMELESS, FACELESS GOVERNMENT REPORTS THAT

1 ESSENTIALLY OPERATE, LIKE YOU SAY, AS P.R. FOR THE
2 VACCINE INDUSTRY.

3 IF I COULD GO TO THE THIRD ISSUE HERE. THE
4 THIRD ISSUE IS WHETHER OR NOT THESE GOVERNMENT
5 PUBLICATIONS ARE SUFFICIENT TO OVERCOME THE PRESUMPTION
6 OF TRUTH AT THE PLEADING STAGE. WE ARE HERE ON
7 DEMURRER, AND RESPECTFULLY, THE COURT HAS TO ACCEPT OUR
8 ALLEGATIONS AS TRUE, AND WE ALLEGE VACCINES ARE UNSAFE,
9 AND FOR THE MOMENT WE BELIEVE THAT IS TRUE.

10 IN ORDER FOR THEM TO OVERCOME THAT
11 PRESUMPTION, THEY WOULD HAVE TO, WE BELIEVE, PRESENT
12 SOMETHING MORE THAN THESE ROTE CONCLUSORY HEARSAY
13 DOCUMENTS. IF VACCINES ARE UNSAFE, THEY SHOULD HAVE THE
14 BURDEN OF PROVING IT BECAUSE THEY'RE THE ONES THAT ARE
15 GOING TO BE ADMINISTERING IT. WE BELIEVE WE CAN PROVE
16 VACCINES ARE UNSAFE, BUT THEY SHOULD HAVE THE BURDEN TO
17 PROVE THAT THEY ARE SAFE, AND WE DO NOT THINK THAT, ON A
18 452(G) REQUEST FOR JUDICIAL NOTICE -- WE JUST THINK
19 THAT'S INSUFFICIENT.

20 AND WE HOPE THE COURT WILL ANSWER THAT
21 QUESTION AS TO WHETHER OR NOT THESE ROTE CONCLUSORY
22 DOCUMENTS ARE SUFFICIENT TO OVERCOME THE PRESUMPTION OF
23 TRUTH AT THE PLEADING STAGE.

24 THE FOURTH ISSUE WE WOULD LIKE TO HAVE THE
25 COURT ADDRESS IS WHETHER VACCINES CAN KILL, AND WE'VE
26 SUBMITTED EVIDENCE ON THIS. I CAN SHOW THE COURT OR --
27 I DON'T KNOW IF THE COLLEAGUES WOULD WANT TO STIPULATE
28 TO IT, BUT WE HAVE VACCINE REPORTS FROM THE V.A.E.R.S.,

1 THE VACCINE ADVERSE EVENT REPORTING SYSTEM, THAT SHOW
2 CLEARLY THAT PEOPLE DIE OF VACCINES. AS A FACTUAL
3 MATTER, THAT IS ABSOLUTELY TRUE.

4 I WOULD SAY AT SOME POINT -- I DON'T WANT
5 TO SOUND TOO ADVERSARIAL HERE, BUT UNDER 128.7 OF THE
6 CODE OF CIVIL PROCEDURE, INTERPRETING RULE 11, WHEN AN
7 ATTORNEY MAKES A STATEMENT, IT HAS TO HAVE SOME KIND OF
8 EVIDENTIARY SUPPORT UNDER 128.7(B)3 IT IS. BUT WHEN
9 THEY SAY THAT VACCINES DON'T KILL, WELL, THEY DO.

10 NOW, THEIR ARGUMENT MAY BE THAT VACCINES
11 KILL INFREQUENTLY OR KILL -- YOU KNOW, IT'S NOT ALARMING
12 OF ENOUGH NUMBER, BUT THEY TAKE THE POSITION THAT
13 VACCINES CANNOT KILL, AND IN THEIR MOTION TO STRIKE,
14 THEY WANTED TO EXCISE THE SENTENCE THAT SAYS "VACCINES
15 KILL AND MAIM," BUT THE COURT, I GUESS, HAD RULED IN THE
16 TENTATIVE -- RESPECTFULLY, THE COURT HAD SAID IT'S MOOT
17 RIGHT NOW BECAUSE OF THE HEARING ON DEMURRER.

18 AND WE CAN APPRECIATE THAT BUT IF I COULD
19 MOVE ON TO THE FIFTH ISSUE. IT'S JUST LIKE THE FOURTH.
20 THE QUESTION IS: CAN VACCINES MAIM? AND "MAIM," WE
21 TAKE TO UNDERSTAND WOULD BE PARALYSIS, ANYTHING SHORT OF
22 DEATH THAT WOULD BE LIFE ALTERING AND PERMANENT. WE'RE
23 CONSIDERING THAT MEANS MAIMING, AND THERE'S PLENTY
24 EVIDENCE THAT THAT HAPPENS ALSO, JUST BASED ON THE FACT
25 THAT THERE IS A VACCINE COURT AND THEY'VE AWARDED 3.4
26 BILLION IN DAMAGES.

27 AND NO. 6 IS OUR -- THE NO. 6 ISSUE WE
28 WOULD LIKE TO HAVE THE COURT RESOLVE IS A PRINCIPAL

1 ISSUE IN THIS CASE: CAN THE GOVERNMENT MANDATE PRODUCTS
2 KNOWN TO BE UNSAFE? AND WE ADDED THE PHRASE "KNOWN TO
3 BE UNSAFE" BECAUSE WE BELIEVE IT IS COMMON KNOWLEDGE
4 THAT THEY ARE KNOWN TO BE UNSAFE. HOW UNSAFE THEY ARE
5 OR HOW SAFE THEY ARE -- THAT MAY BE A QUESTION
6 ULTIMATELY, BUT CAN THE GOVERNMENT MANDATE PRODUCTS
7 KNOWN TO BE UNSAFE?

8 WELL, OUR ARGUMENT IS THAT, IF THERE IS A
9 MEDICAL INTERVENTION THAT HAS AN UNPREDICTABLE ASPECT TO
10 IT, THEN WE THINK PARENTS SHOULD BE ABLE TO OPT OUT
11 BECAUSE, WHEN VACCINES DO KILL, WHEN VACCINES DO MAIM,
12 NOBODY KNOWS WHY. AND IF THE COURT WERE TO LOOK AT -- I
13 HAVE SOME COPIES HERE OF A BUNCH OF VACCINE COURT CASES,
14 AND THEY ALL SAY THE SAME THING. IT'S TRULY REMARKABLE.

15 BUT IN THESE VACCINE COURT CASES, WHAT
16 HAPPENS IS THAT, IN EVERY INSTANCE, THERE'S A
17 SETTLEMENT, AND THE RESPONDENT WHICH IS THE HEALTH AND
18 HUMAN SERVICES, THE FEDERAL GOVERNMENT -- THEY DENY
19 LIABILITY IN EVERY CASE, BUT IN ORDER TO, YOU KNOW,
20 AVOID THE UNNECESSARY EXPENSE OF GOING FORWARD, THEY
21 ENTER INTO A SETTLEMENT. BUT IT SEEMS TO ME THERE'S
22 SOMETHING INHERENTLY JUST WRONG ABOUT THAT BECAUSE WHY
23 WOULD THE GOVERNMENT WANT TO SETTLE?

24 IF I WERE SUING VONS OR RALPH'S, YOU KNOW,
25 SOMEONE'S SLIP AND FALL, THERE MAY BE AN IMPETUS FOR A
26 DEFENDANT TO SETTLE -- THE COST OF GOING TO TRIAL, A
27 POTENTIAL JURY AWARD. BUT WHEN YOU THINK ABOUT IT, IF A
28 PERSON DOESN'T TAKE THE VACCINE COURT RECOMMENDATION,

1 THEY'RE STUCK. THERE IS NOWHERE TO GO. THERE IS NO
2 POSSIBLE OUTLET.

3 AND SO OUR POSITION IS THAT THE VACCINE
4 COURT IS SUCH A -- AN ABERRATION. I WOULD USE THE WORD
5 "KANGAROO COURT" IS THE BEST WAY TO EXPLAIN IT BECAUSE,
6 AGAIN, THERE'S NO FEDERAL RULES OF CIVIL PROCEDURE.
7 THERE'S NOTHING OTHER THAN A PERSON WHO IS NOT A LAWYER
8 WHO IS TRYING TO DECIDE IF THE PERSON SHOULD GET
9 COMPENSATION OR NOT.

10 AND WHAT I CAN -- WHAT I'VE BEEN ABLE TO
11 GLEAN OUT OF ALL OF THIS IS ABOUT ONE IN FIVE CLAIMANTS
12 ACTUALLY GET PAID, BUT WHEN THEY DO GET PAID, NOBODY
13 KNOWS WHY. ALL IT SAYS IS THAT THE RESPONDENT HEALTH
14 AND HUMAN SERVICES ENTERS INTO A CONFIDENTIAL AGREEMENT
15 WITH THE PETITIONER AND -- BUT AGAIN, WHY WOULD THEY DO
16 THAT? THE GOVERNMENT SHOULDN'T BE AFRAID OF A JURY
17 TRIAL BECAUSE THERE NEVER WILL BE ONE.

18 IT'S NOT LIKE THE PERSON COULD EVER GO ON
19 AND SUE THE MANUFACTURER. BUT IT'S ONLY SET UP TO
20 CREATE AN APPEARANCE THAT SOME PEOPLE ARE ABLE TO, YOU
21 KNOW, GET PAID; BUT ALSO, AT THE SAME TOKEN, THEY HAVE
22 CONFIDENTIAL SETTLEMENT AGREEMENTS IN THESE VACCINE
23 COURTS, AND THAT MAKES NO SENSE TO ME EITHER. IF THERE
24 IS A SLIP AND FALL IN THE RALPH'S OR VONS, WE CAN
25 UNDERSTAND WHY THERE WOULD BE A CONFIDENTIAL SETTLEMENT
26 AGREEMENT BECAUSE YOU DON'T WANT TO GIVE SOMEONE THE
27 BRIGHT IDEA TO GO SLIP AND FALL OR WHATEVER. BUT WHO IS
28 GOING TO GIVE SOMEONE A BRIGHT IDEA TO GO GET VACCINE

1 INJURED?

2 THE WHOLE THING IS SO -- IT'S SO -- I CAN'T
3 COME UP WITH THE WORD HERE. TO US IT'S THE BEST PROOF
4 THAT VACCINES ARE UNSAFE THE WAY THEY'VE SET THIS UP.

5 **MR. RICH:** EXCUSE ME, YOUR HONOR, I APOLOGIZE FOR
6 INTERRUPTING, BUT COUNSEL HAS BEEN SPEAKING FOR ABOUT
7 45 MINUTES. APPARENTLY, THERE'S GOING TO BE SOME FORM
8 OF AN EVENT IN THE COURTHOUSE SHORTLY. CAN WE SET A
9 TIME LIMIT? I ONLY HAVE A FEW MINUTES, I THINK --

10 **THE COURT:** YOU HAVE -- HOW MANY POINTS WERE
11 THERE?

12 **MR. PHILLIPS:** I THINK 13.

13 **THE COURT:** 13? I THOUGHT THERE WERE 12.

14 **MR. RICH:** 12. THERE ARE 12 POINTS, YOUR HONOR.

15 **THE COURT:** WHAT TIME --

16 **THE CLERK:** THE ANNOUNCEMENT SAID 10:20, YOUR
17 HONOR.

18 **THE COURT:** YOU'VE GOT 7 MORE?

19 **MR. PHILLIPS:** YEAH. I CAN -- I WAS TOLD ALSO --
20 IF IT PLEASE THE COURT, I HAD SPOKEN TO SOME FRIENDS AT
21 THE P.D.'S OFFICE WHO TOLD ME THAT THERE WOULD BE ONE
22 TODAY AROUND THE 10:00 O'CLOCK HOUR, BUT I COULD FINISH
23 IN 15 MINUTES.

24 **MR. RICH:** WELL, THAT WOULDN'T GIVE ME ANY TIME,
25 YOUR HONOR, IF, IN FACT, THEY'RE GOING TO ANNOUNCE IT AT
26 10:00.

27 **THE COURT:** CAN YOU FINISH BY FIVE OF?

28 **MR. PHILLIPS:** YES, I BELIEVE I CAN, YOUR HONOR.

1 **MR. RICH:** FIVE OF SHOULD BE GOOD ENOUGH, YOUR
2 HONOR.

3 **MR. PHILLIPS:** THE NEXT QUESTION IS THERE ARE
4 COMPELLING STATE INTERESTS IN SB-277. WELL, THAT WOULD
5 BE THE QUESTION NO. 7: IS THERE A COMPELLING STATE
6 INTEREST IN THE STATED GOAL? AND WHAT IS THE STATED
7 GOAL OF SB-277? IT'S CALLED "TOTAL IMMUNIZATION."

8 AND WE'RE WONDERING WHAT DOES "TOTAL
9 IMMUNIZATION" MEAN? WE THINK THERE IS NOT A COMPELLING
10 STATE INTEREST IN TOTAL IMMUNIZATION, AND ALSO, WE
11 BELIEVE THAT IT'S VAGUE AND AMBIGUOUS. IT'S VAGUE
12 BECAUSE WE DON'T KNOW WHAT IT MEANS. IT'S AMBIGUOUS
13 BECAUSE, CLEARLY, IT'S SUSCEPTIBLE TO MORE THAN ONE
14 DEFINITION.

15 WELL, TOTAL IMMUNIZATION, AT FIRST BLUSH,
16 MAY MEAN A HUNDRED PERCENT. THEY WANT TO GET EVERYBODY
17 VACCINATED. BUT THAT'S INCONSISTENT WITH THEIR THEORY.
18 ALL OF MEDICAL VACCINE SCIENCE IS BASED ON THIS NOTION
19 OF HEARD IMMUNITY, THAT IF THEY GET 95 PERCENT OR
20 THEREABOUTS, THEN IT WOULD GIVE ALL THE FEEBLES, THE
21 INFANTS, THE ELDERLIES, THE PREGNANCY
22 IMMUNOCOMPROMISED -- THEY WILL GET THE BENEFITS IF
23 THEY'RE ABLE TO HAVE TOTAL IMMUNIZATION.

24 BUT THE QUESTION IS: DOES TOTAL
25 IMMUNIZATION MEAN 95 PERCENT OR A HUNDRED PERCENT? WE
26 THINK THEY'RE ALREADY AT 95 PERCENT FROM WHAT WE'VE BEEN
27 ABLE TO TELL; SO THERE'S NOT REALLY A COMPELLING STATE
28 INTEREST BECAUSE THEY'RE VACCINATED ENOUGH TO HAVE HEARD

1 IMMUNITY. AND KNOWING THAT SCIENCE IS BASED ON HEARD
2 IMMUNITY, THEY DON'T NEED TO GO ANY FURTHER. SO NOT
3 ONLY IS THERE NOT A COMPELLING INTEREST IN THE STATED
4 GOAL, BUT IT SEEMS THERE'S NO INTEREST IN IT OF ANY KIND
5 WHATSOEVER.

6 THE NEXT ONE IS -- THIS WILL BE THE TWELFTH
7 AND FINAL ONE HERE. I THINK I'M ON THE LAST ONE
8 ALREADY. ACTUALLY -- OKAY. I SKIPPED TWO. I'M SORRY.

9 NUMBER 8 IS: WAS SB-277 NARROWLY TAILORED?
10 AND THE QUESTION OF NARROWLY TAILORED, OF COURSE,
11 FOLLOWS RIGHT ON THE HEELS OF WHETHER THERE IS A
12 COMPELLING STATE INTEREST. WAS SB-277 NARROWLY
13 TAILORED? NO, BECAUSE THERE ARE LESS RESTRICTIVE MEANS
14 AVAILABLE.

15 FOR THIS OUTBREAK AT DISNEYLAND, THEY COULD
16 HAVE HAD QUARANTINE MEASURES. THEY COULD HAVE PUT THE
17 YELLOW TAPE AROUND THE MAGIC KINGDOM AND CLOSED IT DOWN.
18 THEY COULD HAVE HAD MANDATORY VACCINATIONS FOR
19 DISNEYLAND EMPLOYEES, MANDATORY VACCINATION FOR TOURIST
20 INDUSTRY WORKERS.

21 THERE IS NO LOGICAL CONNECTION BETWEEN
22 VACCINATING THE KIDS IN THE SCHOOL AND THIS OUTBREAK AT
23 DISNEYLAND. IN FACT, WHEN YOU THINK ABOUT IT, THERE'S
24 REALLY NO RATIONAL RELATION FOR VACCINATING KIDS IN THE
25 SCHOOL IN THE FIRST PLACE. IF THE SCHOOL WERE A CLOSED
26 FINITE SYSTEM -- IF IT PLEASE THE COURT, YOUR HONOR MAY
27 BE FAMILIAR WITH THE HARRY POTTER MOVIES AND SO FORTH.
28 THEY HAVE A SCHOOL CLOSED OFF. IT'S ON AN ISLAND.

1 NOBODY COMES IN AND NOBODY GOES OUT. IF THE SCHOOL WERE
2 A CLOSED, FINITE SYSTEM, THEN IT MIGHT MAKE SENSE.

3 BACK IN THE DAY OF JACOBSON, 1905, THAT'S
4 REALLY THE ONLY PLACE CHILDREN WOULD MEET WAS IN THE
5 SCHOOLHOUSE; SO SCHOOL-BASED VACCINATION KIND OF MADE
6 SENSE. BUT TODAY KIDS THAT ARE UNVACCINATED THAT AREN'T
7 ALLOWED TO GO SCHOOL, THEY'RE STILL GOING TO MINGLE IN
8 THE CHUCK E. CHEESE OR THE 7-11 OR IN THE MALL, OR IN
9 THE RESTAURANT. AND THE POINT IS IT REALLY DOESN'T MAKE
10 ANY SENSE.

11 ALSO, THE WAY THEY'RE IMPLEMENTING IT.
12 THEY'RE ONLY FOISTING THIS UPON KINDERGARTENERS AND
13 SEVENTH GRADERS. AND THAT MAKES NO SENSE AT ALL. IF
14 THERE WERE TRULY AN OUTBREAK OF INFECTIOUS DISEASE, IT
15 WOULD APPLY TO EVERYBODY.

16 IN THE CASES LIKE JACOBSON, FOR EXAMPLE,
17 ALL INHABITANTS OF CAMBRIDGE HAD TO GET VACCINATED. BUT
18 IN CALIFORNIA TODAY, THEY JUST WANT THE KINDERGARTENERS.
19 WELL, WHY ARE THEY GETTING JUST THE KINDERGARTENERS?
20 THEY'RE GOING TO LET THE SECOND GRADER GO TO SCHOOL, AND
21 THEN GO TO SCHOOL THE NEXT YEAR IN THIRD GRADE, THE NEXT
22 YEAR IN FOURTH GRADE, HOLD THE TIME UNVACCINATED IN THE
23 FIFTH GRADE AND SIXTH GRADE, AND THEN, WHEN THEY GET TO
24 SEVENTH GRADE, THEN THEY'RE GOING TO FORCE THEM TO BE
25 VACCINATED.

26 THE POINT IS, THE ADMINISTRATION OF THE
27 VACCINATION POLICY MAKES ABSOLUTELY NO SENSE BECAUSE IN
28 NO WAY IS THIS TAILORED OR GEARED TOWARDS THE STOPPING

1 OR HALTING OF THE SPREAD OF INFECTIOUS DISEASE. WHAT
2 THEY'RE REALLY DOING IS THEY'RE GETTING 15 PERCENT OF
3 THE POPULATION. JUST TWO GRADES OUT OF 13 TOTAL GRADES.
4 2 OVER 13 IS APPROXIMATELY 15 PERCENT.

5 THEY'RE DOING THIS SO THEY CAN VANQUISH THE
6 OPPOSITION AND MAKE SURE THAT THERE'S NOT A SUBSTANTIAL
7 NUMBER OF PEOPLE TO RISE UP. IF THEY WOULD HAVE
8 ENFORCED THIS ON EVERYBODY ALL AT ONE TIME, I BELIEVE
9 THERE WOULD BE A LOT MORE VIRULENT OPPOSITION, BUT IT
10 ONLY APPLIES RIGHT NOW TO KINDERGARTENERS AND SEVENTH
11 GRADERS, AND THAT MAKES NO SENSE, ESPECIALLY WHEN YOU
12 THINK THAT IN ANY SCHOOLS YOU HAVE PARENTS WALKING IN,
13 TEACHERS WALKING IN, THE LUNCH LADY, THE LUNCH MAN,
14 WORKERS, MAINTENANCE PEOPLE. THESE PEOPLE COULD SPREAD
15 THE DISEASE.

16 THE POINT IS THERE'S NO RATIONAL RELATION.
17 EVEN IF WE LOOK AT THE LOWER FORM OF SCRUTINY, NOTHING
18 ABOUT THIS IS TAILORED TO STOPPING DISEASE. THEY'RE
19 JUST RIDING THIS NOTION THAT MANDATORY VACCINATION IS
20 NOT UNCONSTITUTIONAL; SO LET'S JUST GO AHEAD AND GET
21 EVERYBODY.

22 THE QUESTION NO. 9 IS: DOES SB-277
23 DISCRIMINATE THE NONVACCINATED AGAINST THE VACCINATED?
24 WE BELIEVE THAT THERE ARE SOME TEN PROTECTED CLASSES IN
25 CALIFORNIA. WE BELIEVE THAT UNVACCINATED PEOPLE SHOULD
26 CONSTITUTE A PROTECTED CLASS BECAUSE IT'S VERY CLOSE TO
27 MEDICAL CONDITION.

28 AND THIS IS ESSENTIALLY A SEPARATE BUT

1 EQUAL SEGREGATION ARGUMENT. THE ONLY DIFFERENCE IS,
2 WHEN THEY HAD SEGREGATION IN THE SCHOOLS, AT LEAST THERE
3 WAS ANOTHER SCHOOL TO GO TO. NOW IT WASN'T THE SAME
4 CALIBER AS THE BETTER SCHOOLS, AND SEPARATE BUT EQUAL IS
5 NOT EQUAL, BUT THESE KIDS ARE KICKED TO THE CURB.
6 THEY'RE NOT GIVEN ANY KIND OF SCHOOL SUPPLIES. THEY'RE
7 NOT GIVING THE PARENTS -- RELIEVING THEM THEIR
8 OBLIGATION TO PAY TAXES AND SO FORTH. THIS IS SIMPLY A
9 PENALTY. THIS HAS NOTHING TO DO WITH STOPPING DISEASES.

10 THIS ALSO DISCRIMINATES -- THIS IS NO. 10:
11 DOES SB-277 DISCRIMINATE AS AMONG THE NON-VACCINATED?

12 WE BELIEVE IT DOES BECAUSE IT ALLOWS -- THE
13 I.E.P. STUDENTS ARE ALLOWED TO GO. THEY'RE ALLOWED TO
14 ATTEND. STUDENTS WITH MEDICAL EXEMPTIONS ARE ALLOWED TO
15 ATTEND. IF THERE WERE TRULY AN EPIDEMIOLOGICAL
16 OUTBREAK, THEY WOULDN'T LET ANYBODY ATTEND. THEY
17 WOULDN'T MAKE THESE EXCEPTIONS, AND, OF COURSE, THE
18 STUDENTS THAT ARE GRANDFATHERED IN -- IF A STUDENT
19 ENTERS THE EIGHTH GRADE RIGHT NOW AND THEY'RE NOT
20 VACCINATED, THEY CAN SAIL THROUGH THE REST OF SCHOOL --
21 EIGHT, NINE, TEN, ELEVEN, AND TWELVE -- AND NEVER GET
22 VACCINATED. IT HAS NOTHING TO DO WITH THE STOPPING OF
23 DISEASE.

24 THE 11TH ISSUE IS WHETHER SB-277 IS
25 MEDICALLY NECESSARY. NOW, "MEDICALLY NECESSARY," THE
26 HARVARD LAW REVIEW ARTICLE DISTINGUISHES BETWEEN
27 PRACTICAL NECESSITY. AND THE PRACTICAL NECESSITY, WELL,
28 IT MIGHT BE A GOOD IDEA TO GET AN H.P. VACCINE IF A

1 13-YEAR-OLD IS, I GUESS, ACTIVE ON THAT DYNAMIC, BUT THE
2 POINT IS THAT'S PRACTICALLY NECESSARY, IF AT ALL.

3 "MEDICAL NECESSARY" MEANS ABSOLUTELY NECESSARY TO
4 THWARTING THE SPREAD OF DISEASE.

5 OUR FINAL ISSUE IS WHETHER SB-277 BENEFITS
6 THE INDIVIDUAL OR THE GROUP, AND WE BELIEVE THAT THIS
7 CERTAINLY BENEFITS THE GROUP AND NOT THE INDIVIDUAL AT
8 ALL. SOME OF THE LANGUAGE FROM THE JACOBSON CASE LIKENS
9 THIS TO A SELECTIVE SERVICE SITUATION. THERE IS AT
10 LEAST THREE OF THE JUSTICES IN THE HARLEN (PHONETIC)
11 COURT WHO WERE IN THE CIVIL WAR, AND THEY SAID AN
12 OUTBREAK OF WAR IS LIKE AN OUTBREAK OF INFECTIOUS
13 DISEASE AND THAT A PERSON OUGHT TO BE READY TO BE SHOT
14 DOWN IN THE DEFENSE OF THEIR COUNTRY, AND WE BELIEVE
15 THAT THIS IS ONLY FOR THE COMMON GOOD.

16 I CAN DO IT IN 30 SECONDS IF --

17 **THE COURT:** I THINK HE'S LOOKING FORWARD TO
18 RESPONDING.

19 **MR. PHILLIPS:** AND THIS IS WHY THIS IS
20 SIGNIFICANT. ONCE THE COURT CONCLUDES THAT THERE IS NO
21 BENEFIT FOR THE INDIVIDUALS, ONLY FOR THE GROUP, THEY'RE
22 DOING THIS TO PROTECT ALL THE VACCINATED AND THE
23 IMMUNOCOMPROMISED, ONCE YOU REALIZE THAT IT'S NOT FOR
24 THE PERSON, THEN IT BECOMES A MEDICAL EXPERIMENT UNDER
25 24175A. AND IF IT'S DEEMED A MEDICAL EXPERIMENT, THERE
26 MUST BE INFORMED CONSENT. IT TRIGGERS THAT REQUIREMENT.

27 AND WE BELIEVE THERE SHOULD BE INFORMED
28 CONSENT. IN SB-277 IT IS UNLAWFUL FOR LACK OF INFORMED

1 CONSENT AND FOR LACK OF AN ABILITY TO OPT OUT.

2 AND IF THE ANNOUNCEMENT DOESN'T COME AT
3 10:00, THEN I WOULD RESPECTFULLY ASK FOR A LITTLE MORE
4 TIME, IF IT PLEASE THE COURT.

5 **THE COURT:** 10:20.

6 COUNSEL.

7 **MR. RICH:** THANK YOU, YOUR HONOR.

8 WHAT I HAVEN'T HEARD FROM COUNSEL IS ANY
9 CASE BESIDES HIS CHARACTERIZATION OF BRUSOWITZ THAT
10 SUPPORTS ANY OF HIS ARGUMENT.

11 IN THE COURSE OF 110 YEARS OF
12 JURISPRUDENCE, EVERY SINGLE COURT THAT HAS ADDRESSED
13 THIS ISSUE HAS HELD THAT IT IS WITHIN THE LEGITIMATE AND
14 COMPELLING INTEREST OF THE STATE TO REGULATE PUBLIC
15 HEALTH AND PARTICULARLY TO MANDATE VACCINATION AND
16 PARTICULARLY TO MANDATE VACCINATION OF SCHOOLCHILDREN IN
17 ORDER TO PROMOTE PUBLIC HEALTH.

18 NO CASE THAT I'M AWARE OF, INCLUDING
19 BRUSOWITZ -- AND I'LL GET TO THAT IN A MINUTE -- HAS
20 EVER HELD TO THE CONTRARY.

21 WITH REGARD TO BRUSOWITZ, PLAINTIFFS'
22 CHARACTERIZATION OF BRUSOWITZ IS A COMPLETE AND UTTER
23 UNFORTUNATE GROSS MISCHARACTERIZATION. IN FACT, IT'S
24 FALSE. THE ISSUE IN BRUSOWITZ WAS SIMPLY THE
25 INTERPRETATION -- EXCUSE ME -- WHETHER OR NOT THE
26 VACCINATION ACT, IN FACT, PREEMPTED STATE AND COMMON LAW
27 WITH REGARD TO PRODUCT LIABILITY AS IT APPLIED TO
28 VACCINATION.

1 THIS IS HOW THE COURT OPENED ITS ARGUMENT
2 EXCUSE ME -- ITS DECISION. QUOTE:

3 WE CONSIDER WHETHER A
4 PREEMPTION PROVISION ENACTED IN THE
5 NATIONAL CHILDHOOD VACCINATION INJURY
6 ACT OF 1986 BARS STATE-LAW-DESIGN DEFECT
7 CLAIMS AGAINST VACCINE MANUFACTURERS.

8 BEHOLDING, QUOTE:

9 FOR THE FOREGOING REASONS, WE
10 HOLD THAT THE NATIONAL CHILDHOOD VACCINE
11 INJURY ACT PREEMPTS ALL DESIGN DEFECT
12 CLAIMS AGAINST VACCINE MANUFACTURERS
13 BROUGHT BY PLAINTIFFS WHO SEEK
14 COMPENSATION FOR INJURY OR DEATH CAUSED
15 BY VACCINE SIDE EFFECTS. THE
16 JUDGMENT -- THE COURT OF APPEALS HAS
17 AFFIRMED.

18 THAT IS THE HOLDING IN BRUSOWITZ. THIS
19 NOTION THAT THE COURT HELD THAT VACCINES ARE UNAVOIDABLY
20 UNSAFE IS FALSE.

21 DURING THE COURSE OF THE COURT'S
22 DISCUSSION, THE COURT CONSIDERED -- APPARENTLY, WHAT WAS
23 AT ISSUE WAS THE EFFECT OF ONE SPECIFIC PROVISION OF THE
24 ACT WHICH SPECIFICALLY PROVIDES, QUOTE:

25 NO VACCINE MANUFACTURER SHALL
26 BE LIABLE IN A CIVIL ACTION FOR DAMAGES
27 ARISING FROM A VACCINE-RELATED INJURY OR
28 DEATH ASSOCIATED WITH THE ADMINISTRATION

1 OF A VACCINE, AND THROUGH OCTOBER 1,
2 1988, IF THE INJURY OR DEATH RESULTS
3 FROM SIDE EFFECTS THAT WERE UNAVOIDABLE
4 EVEN THOUGH THE VACCINE WAS PROPERLY
5 PREPARED AND WAS ACCOMPANIED BY PROPER
6 DIRECTIONS AND WARNINGS.

7 THE TERM "UNAVOIDABLY UNSAFE" WAS ACTUALLY
8 INTRODUCED INTO THE CASE BY THE PETITIONERS IN BRUSOWITZ
9 WHO WERE URGING THE COURT TO EQUATE THE LANGUAGE OF THE
10 STATUTE WHICH REFER TO SIDE EFFECTS THAT WERE
11 UNAVOIDABLE WITH A COMMENT "K" TO THE RESTATEMENT OF
12 TORTS SECOND WHICH HELD THAT COMMENT "K" EXEMPTS FROM A
13 STRICT LIABILITY RULE UNDER THE COMMON LAW. QUOTE:

14 UNAVOIDABLY UNSAFE PRODUCTS.

15 CLOSE QUOTE.

16 THIS IS WHAT THE COURT SAID IN RESPONSE:

17 WE HAVE NO NEED TO CONSIDER THE
18 FINER POINTS OF COMMENT "K." WHATEVER
19 CONSISTENT JUDICIAL LOSS THAT COMMENT
20 MAY HAVE BEEN GIVEN IN 1986, THERE IS NO
21 REASON TO BELIEVE THAT THE SPECIFIC
22 SECTION IN QUESTION WAS INVOKING IT.

23 THAT'S IT. I HAVE RARELY HEARD OF A MORE
24 MISCHARACTERIZED SUMMARY OF A CASE THAN PLAINTIFFS'.
25 BRUSOWITZ IS IRRELEVANT TO THIS CASE. IT DOES NOT STAND
26 FOR ANYTHING THAT HAS TO DO WITH THIS CASE. JACOBSON
27 DOES. PRINCE DOES. ZUKE (PHONETIC) DOES. ABELE VS.
28 CLARK (PHONETIC), WHICH IS FROM THE CALIFORNIA SUPREME

1 COURT. FRENCH VS. WILLIAMS FROM THE CALIFORNIA SUPREME
2 COURT -- ALL OF THESE CASES HAVE HELD UNEQUIVOCABLY THAT
3 IT IS WITHIN THE LEGITIMATE AND COMPELLING INTERESTS OF
4 THE STATE TO ENACT MANDATORY VACCINATION STATUTES.

5 WITH REGARD TO PLAINTIFFS' PLEA THAT IT BE
6 ALLOWED TO ENGAGE IN DISCOVERY AND INTRODUCE INTO THIS
7 COURT EVIDENCE THAT VACCINATIONS ARE UNSAFE, JACOBSON IS
8 INSTRUCTIVE. ON PAGES 23 AND 24 AT 197 U.S. OF THE
9 DECISION, THE COURT RELATES THAT, IN FACT, THE DEFENDANT
10 IN THAT CASE IN THE LOWER COURT ATTEMPTED TO INTRODUCE
11 INTO EVIDENCE, EVIDENCE THAT VACCINATIONS HAD DANGEROUS
12 SIDE EFFECTS AND WERE INJURIOUS, AND THE LOWER COURT
13 DENIED THAT.

14 AND THIS IS ONE OF THE THINGS THAT THE
15 DEFENDANT APPEALED TO THE SUPREME COURT. AND THE
16 SUPREME COURT HELD THAT, FIRST OF ALL, THE ONLY
17 COMPETENT EVIDENCE THAT COULD BE PRESENTED TO THE COURT
18 TO PROVE THESE PROPOSITIONS WAS THE TESTIMONY OF EXPERTS
19 GIVING THESE OPINIONS. THEY WOULD HAVE -- IT WOULD NOT
20 HAVE BEEN COMPETENT TO INTRODUCE THE MEDICAL HISTORY OF
21 INDIVIDUAL CASES. THEN THE COURT SAYS AS FOLLOWS:

22 ASSUMING THAT MEDICAL EXPERTS
23 COULD HAVE BEEN FOUND WHO WOULD HAVE
24 TESTIFIED IN SUPPORT OF THESE
25 PROPOSITIONS AND THAT IT HAD BECOME THE
26 DUTY OF THE JUDGE IN ACCORDANCE WITH THE
27 LAW TO INSTRUCT THE JURORS TO WHETHER OR
28 NOT THE STATUTE IS UNCONSTITUTIONAL, THE

1 COURT SAYS THE JUDGE WOULD HAVE BEEN
2 OBLIGED TO CONSIDER THE EVIDENCE IN
3 CONNECTION WITH FACTS OF COMMON
4 KNOWLEDGE, WHICH THE COURT WILL ALWAYS
5 REGARD IN PASSING UPON THE
6 CONSTITUTIONALITY OF A STATUTE. HE
7 WOULD HAVE CONSIDERED THE TESTIMONY OF
8 EXPERTS IN CONNECTION WITH THE FACTS
9 THAT, FOR NEARLY A CENTURY --

10 AND THIS WAS BACK THIS 1905.

11 -- THAT FOR NEARLY A CENTURY,
12 MOST OF THE MEMBERS OF THE MEDICAL
13 PROFESSION HAVE REGARDED VACCINATION
14 REPEATED AFTER INTERVALS OF PREVENTIVE
15 SMALLPOX -- THAT WHILE THEY HAVE
16 RECOGNIZED THE POSSIBILITY OF INJURY TO
17 AN INDIVIDUAL FROM CARELESSNESS IN THE
18 PERFORMANCE OF IT OR EVEN IN A
19 CONCEIVABLE CASE WITHOUT CARELESSNESS,
20 THEY --

21 MEANING THE MEDICAL PROFESSION.

22 -- THEY GENERALLY HAVE
23 CONSIDERED THE RISK OF SUCH AN INJURY
24 TOO SMALL TO BE SERIOUSLY WEIGHED AS
25 AGAINST THE BENEFITS COMING FROM THE
26 DISCRETE AND PROPER USE OF THE
27 PREVENTIVE.

28 THE COURT THEN SAID -- IN OTHER WORDS, THE

1 LOWER COURT WAS RIGHT TO BAR SUCH TESTIMONY BECAUSE IT
2 WOULD NOT, QUOTE:

3 IT COULD NOT HAVE CHANGED THE
4 RESULT.

5 CLOSE QUOTE.

6 BECAUSE WHAT IS AN ISSUE AND ONLY AT ISSUE,
7 ACCORDING TO THE COURT IS THAT:

8 THE COMMONWEALTH OF
9 MASSACHUSETTS WAS NOT COMPELLED TO
10 COMMIT A MATTER INVOLVED IN THE PUBLIC
11 HEALTH AND SAFETY TO THE FINAL DECISION
12 OF A COURT OR JURY. IT IS NO PART OF
13 THE FUNCTION OF A COURT OR JURY TO
14 DETERMINE WHICH ONE OF TWO MODES WAS
15 LIKELY TO BE THE MOST EFFECTIVE FOR THE
16 PROTECTION OF THE PUBLIC AGAINST
17 DISEASE. THAT WAS FOR THE LEGISLATIVE
18 DEPARTMENT TO DETERMINE IN THE LIGHT OF
19 ALL THE INFORMATION IT HAD OR COULD
20 OBTAIN.

21 THAT IS THE HOLDING IN JACOBSON. JACOBSON
22 HAS HELD FIRMLY -- AND BY THE WAY, THE COURT IN
23 JACOBSON, QUOTE:

24 WE TAKE JUDICIAL NOTICE OF THE
25 FACT THAT THIS --

26 MEANING THE PREVENTIVE AND SAFE -- RELATIVE
27 SAFETY OF THE SMALLPOX VACCINE --

28 WE TAKE JUDICIAL NOTICE THAT

1 THIS IS THE COMMON BELIEF THE PEOPLE OF
2 THE STATE.

3 COUNSEL STATED THAT WHAT IS IMPORTANT HERE
4 IS WHAT IS COMMON KNOWLEDGE. AND COUNSEL, I BELIEVE,
5 ACKNOWLEDGED, COMMON KNOWLEDGE IS HELD BY THE PEOPLE.
6 THE COURTS OF THE UNITED STATES AND THE COURTS OF THIS
7 STATE HAVE UNIFORMLY AND REPEATEDLY HELD THAT COMMON
8 KNOWLEDGE OF THE PEOPLE IS WHAT'S REFLECTED IN THE ACTS
9 OF ITS LEGISLATURE.

10 AND IN MATTERS SUCH AS MANDATORY
11 VACCINATIONS, THE DISCRETION IS COMPLETELY WITHIN THE
12 LEGISLATURE. BY THE WAY, JACOBSON IN ITS RULING RELIED
13 UPON A PRIOR HOLDING BY THE CALIFORNIA SUPREME COURT --
14 ABELE VS. CLARK, WHICH ALSO UPHELD CALIFORNIA'S
15 MANDATORY VACCINATION STATUTE. AND EVEN IN THAT
16 HOLDING, THE CALIFORNIA SUPREME COURT STATED AS FOLLOWS:

17 WHILE VACCINATION MAY NOT BE
18 THE BEST AND SAFEST PREVENTIVE POSSIBLE,
19 EXPERIENCE AND OBSERVATION THAT TESTED
20 THE VALUE OF SUCH DISCOVERY DATING FROM
21 THE YEAR 1796, WHEN JENNER DISCLOSED IT
22 TO THE WORLD, HAS PROVED IT TO BE THE
23 BEST METHOD KNOWN TO MEDICAL SCIENCE TO
24 LESSEN THE LIABILITY TO INFECTION WITH
25 DISEASE.

26 THE COURT CONCLUDED, THEREFORE, IT WAS FOR
27 THE LEGISLATURE TO DETERMINE WHETHER THE SCHOLARS OF THE
28 PUBLIC SCHOOLS SHOULD BE SUBJECTED TO THE VACCINATIONS,

1 AND WE THINK IT WAS JUSTIFIED IN DEEMING IT A NECESSARY
2 AND SALUTARY BURDEN TO IMPOSE UPON THAT GENERAL CLASS.

3 FRENCH VS. DAVIDSON FOLLOWED ABELE VS.
4 CLARK (PHONETIC). IT WAS DECIDED ONE YEAR BEFORE
5 JACOBSON. FRENCH VS. DAVIDSON SPECIFICALLY HELD THAT
6 MANDATORY VACCINATION IN NO WAY INTERFERES WITH THE
7 RIGHT OF A CHILD TO ATTEND SCHOOL, PROVIDED THE CHILD
8 COMPLIES WITH ITS PROVISIONS.

9 AND IT IS FOR THE LEGISLATURE, QUOTE:

10 TO SAY WHETHER VACCINATION
11 SHALL BE HAD AS TO ALL SCHOOLCHILDREN
12 WHO HAVE NOT BEEN VACCINATED ALL THE
13 TIME.

14 IN 1913, THE CALIFORNIA COURT OF APPEAL IN
15 WILLIAMS VS. WEEVER (PHONETIC) UPHELD MANDATORY
16 VACCINATION RULES IMPOSED BY THE UNIVERSITY OF
17 CALIFORNIA'S BOARD OF REGENTS, AND IN SO DOING SAYS:

18 AS HAS BEEN HERETOFORE SEEN,
19 THE STATE OF CALIFORNIA STANDS COMMITTED
20 TO THE POLICY OF REQUIRING VACCINATION
21 AS THE BEST PREVENTIVE MEANS KNOWN TO
22 MEDICAL SCIENCE FOR LESSENING THE
23 LIABILITY TO INFECTION WITH A DREADED
24 AND DANGEROUS DISEASE.

25 IN WALKER VS. SUPERIOR COURT IN 1988, THE
26 CALIFORNIA SUPREME COURT RECOGNIZED THE REASONING OF
27 PRINCE AND OF JACOBSON WITH FAVOR, STATING:

28 PARENTS HAVE NO RIGHT TO FREE

1 EXERCISE OF RELIGION AT THE PRICE OF A
2 CHILD'S LIFE REGARDLESS OF THE
3 PROHIBITIVE OR COMPULSIVE NATURE OF THE
4 GOVERNMENT INFRINGEMENT. FURTHERMORE,
5 THE UNITED STATES SUPREME COURT HAS
6 SPECIFICALLY SUSTAINED THE COMPULSION OF
7 RELIGIOUSLY PROHIBITED CONDUCT FOR
8 INTERESTS NO MORE COMPELLING THAN ARE
9 REPLICATED HERE.

10 CITING JACOBSON AND RECOGNIZING THAT IN
11 THAT CASE THE COURT UPHELD A LAW COMPELLING THE
12 VACCINATION OF CHILDREN FOR COMMUNICABLE DISEASES IN THE
13 FACE OF PARENTAL RELIGIOUS OBJECTIONS.

14 YOUR HONOR, I CAN GO ON AND ON AND ON.
15 WE'VE CITED TO ALL OF THESE CASES IN OUR BRIEFS. THERE
16 IS ABSOLUTELY NO AUTHORITY TO JUSTIFY PLAINTIFFS' CAUSE
17 OF ACTION. THERE IS NO AUTHORITY TO ALLOW PLAINTIFF TO
18 ENGAGE WILLY NILLY IN DISCOVERY FOR THE PURPOSES OF
19 PRODUCING RETAINED EXPERTS TO EXPRESS THEIR PERSONAL
20 OPINIONS AS TO THE SAFETY OR EFFECTIVENESS OF
21 VACCINATIONS.

22 WE'VE INTRODUCED INTO THE RECORD, YOUR
23 HONOR -- WE'VE ASKED THE COURT TO TAKE JUDICIAL NOTICE
24 OF THE LEGISLATIVE RECORD. PLAINTIFFS DID NOT OBJECT TO
25 THAT. THE LEGISLATIVE RECORD, YOUR HONOR, MAKES IT VERY
26 CLEAR THAT THE LEGISLATURE CONSIDERED ALL OF THESE
27 ARGUMENTS, IN FACT, CONSIDERED THE LEGAL ARGUMENTS,
28 CONSIDERED JACOBSON AND ITS PROGENY. IT CONSIDERED THE

1 OBJECTIONS RAISED BY PARENTS AND OTHER GROUPS WHO
2 OBJECTED TO THE MANDATORY VACCINATION PROVISIONS AND IN
3 PARTICULAR NOTED THAT THE NATIONAL VACCINATION ACT
4 ACTUALLY ESTABLISHED A COMMITTEE FROM THE INSTITUTE OF
5 MEDICINE TO REVIEW THE LITERATURE ON VACCINE REACTIONS.

6 IN 2011 THAT INSTITUTE PUBLISHED A REPORT
7 ON THE ADVERSE EFFECTS OF VACCINES AND HELD THAT -- THAT
8 AGAIN FOUND THAT VACCINES ARE GENERALLY VERY SAFE AND
9 THAT SERIOUS ADVERSE EVENTS ARE QUITE RARE.

10 THE LEGISLATURE CONSIDERED THIS AND SO MUCH
11 OTHER INFORMATION FROM, NOT ONLY ADVOCATES OF VACCINE,
12 BUT ALSO THOSE WHO OPPOSED THEM, AND ITS CONSIDERED
13 JUDGMENT, AFTER WEIGHING ALL OF THOSE ARGUMENTS,
14 INCLUDING ARGUMENTS VERY SIMILAR TO WHAT THE PLAINTIFFS
15 ARE MAKING NOW THAT VACCINES ARE NOT SAFE, THE
16 LEGISLATURE REJECTED THOSE ARGUMENTS AND ENACTED SB-277.
17 THE TEST FOR SB-277 WITH REGARD TO ANY INFRINGEMENT ON
18 RELIGIOUS FREEDOM IS ONE OF A RATIONAL BASIS, WHICH
19 SB-277 FOR REASONS WE'VE STATED IN OUR DEMURRER ARE
20 EASILY SATISFIED.

21 WITH REGARD TO THE CALIFORNIA RIGHT TO
22 EDUCATION, THE FRENCH CASE SPECIFICALLY HELD THAT IT
23 DOES NOT INFRINGE UPON THE RIGHT TO AN EDUCATION. AND
24 FRENCH WAS DECIDED AFTER THE ENACTMENT OF THE
25 CONSTITUTIONAL PROVISION PROVIDED FOR SUCH A RIGHT.

26 EVEN SO, CASE AFTER CASE THAT WE'VE CITED
27 TO, NOT ONLY IN CALIFORNIA, NOT ONLY THE U.S. SUPREME
28 COURT, BUT IN TWO THOUSAND AND I BELIEVE 15 -- 2013,

1 PHILLIPS (PHONETIC) IN THE SECOND CIRCUIT, TWO THOUSAND
2 AND -- FORGIVE ME. I THINK IT WAS 2015 IN PHILLIPS,
3 2014 IN THE FOURTH CIRCUIT, AND AS RECENTLY AS JUST A
4 COUPLE MONTHS AGO WHEN THE SOUTHERN DISTRICT OF
5 CALIFORNIA -- EXCUSE ME -- SOUTHERN DISTRICT OF
6 CALIFORNIA, THE FEDERAL COURT IN SAN DIEGO CONSIDERED
7 OBJECTIONS TO SB-277 AND HELD THAT IT WAS
8 CONSTITUTIONAL.

9 ALL OF THESE CASES HAVE HELD, NOT ONLY IS
10 THERE A LEGITIMATE INTEREST, BUT THERE IS A COMPELLING
11 STATE INTEREST IN REGULATING THE HEALTH AND SAFETY OF
12 ITS CITIZENS, INCLUDING SPECIFICALLY THE ENACTMENT OF
13 MANDATORY VACCINATION LAWS AND INCLUDING SPECIFICALLY
14 THE ENACTMENT OF MANDATORY VACCINATION LAWS FOR
15 SCHOOLCHILDREN AND OTHER CHILDREN.

16 I DON'T THINK IT'S NECESSARY TO BELABOR THE
17 ISSUE WITH REGARD TO WHETHER SB-277 IS NARROWLY
18 TAILORED. WE'VE ADDRESSED THAT IN OUR BRIEFS, WHICH I'M
19 SURE THE COURT IS VERY FAMILIAR WITH. IN SUMMARY
20 THOUGH, THE STATUTE IS LIMITED TO TEN ENUMERATED
21 VACCINATIONS, ALL OF WHICH ARE INTENDED TO PREVENT THE
22 SPREAD AND CONTAGION OF VERY SERIOUS AND DEADLY
23 DISEASES.

24 THE STATUTE PROVIDES FOR A MEDICAL
25 EXEMPTION, IF A PHYSICIAN CAN ATTEST THAT A VACCINATION
26 WILL CAUSE INJURY TO A SPECIFIC CHILD BECAUSE OF
27 SOMETHING UNIQUE ABOUT THAT CHILD, THEN THE CHILD CAN BE
28 EXEMPT FROM ITS PROVISIONS.

1 THE STATUTE DOES MAKE PROVISION FOR
2 CHILDREN WHO ARE IN INDIVIDUALIZED EDUCATIONS PROGRAMS,
3 AND IMPORTANTLY, THE STATUTE PROVIDES FOR HOME
4 SCHOOLING; SO IT DOES NOT DENY EDUCATION. PARENTS HAVE
5 THE OPTION TO ENROLL THEIR CHILDREN IN HOME SCHOOLING.
6 IS IT THE SAME AS ENROLLING IN THE GENERAL POPULATION?
7 NO, IT IS NOT, BUT THAT'S A CHOICE THAT THE PARENTS HAVE
8 TO MAKE. IT IS NEVERTHELESS THE CHOICE THAT THE
9 LEGISLATURE HAS GIVEN TO PARENTS.

10 AND ALSO, QUITE FRANKLY, WITH REGARD TO ANY
11 OTHER VACCINATION THAT'S NOT SPECIFICALLY ENUMERATED
12 AMONGST THOSE TEN, THE STATUTE PRESERVES THE
13 PERSONAL-BELIEF EXEMPTION. SO IT IS NARROWLY TAILORED.
14 IT IS CONSTITUTIONAL.

15 THE PLAINTIFF ACKNOWLEDGES THEY CAN'T CITE
16 TO A SINGLE CASE THAT HOLDS OTHERWISE, AND FOR ALL OF
17 THOSE REASONS, AS WELL AS THOSE IN OUR BRIEFS, YOUR
18 HONOR, WE ASK THE COURT TO ADOPT ITS TENTATIVE AND TO
19 SUSTAIN THE DEMURRER.

20 **MR. PHILLIPS:** IF I CAN BE VERY BRIEF, YOUR HONOR?

21 **THE COURT:** SURE.

22 **MR. PHILLIPS:** THERE WAS -- THE REASON WE DID NOT
23 OBJECT TO THE LEGISLATIVE RECORD IS BECAUSE THEY CLEARLY
24 STATE THERE WAS A MEASLES OUTBREAK. A MEASLES "EVENT"
25 IS WHAT I WOULD SAY. BUT BECAUSE THERE WAS A MEASLES
26 EVENT, THEY REMOVE THE PERSONAL-BELIEF EXEMPTIONS FOR
27 THE MEASLES VACCINATION, FOR MUMPS, RUBELLA, CHICKENPOX
28 TETANUS, POLIO.

1 THE POINT IS FOR TEN DIFFERENT -- THEY
2 REMOVE THE PERSONAL-BELIEF EXEMPTIONS FOR TEN DIFFERENT
3 VACCINATIONS, FOR TEN DIFFERENT DISEASES. IF THIS WERE
4 NARROWLY TAILORED, BECAUSE OF THE MEASLES OUTBREAK, THEY
5 WOULD INSIST ON REMOVING A PERSONAL BELIEF FROM MEASLES.

6 THE FACT THAT THEY'VE EXPANDED THE SCOPE
7 AND GONE TO ALL TEN SHOWS THAT IT'S NOT NARROWLY
8 TAILORED. I WOULD SAY ALSO THAT WHAT I THINK IS SO
9 IMPORTANT HERE IS WHAT ALL THESE CASES, WHERE THEY SAY
10 VACCINATION IS NOT UNCONSTITUTIONAL, THEY ARE TALKING
11 ABOUT THE COWPOX VIRUS, THE VACCINIA VIRUS, WHERE IN
12 THESE CASES, AGAIN, THERE'S NO NEEDLE AND PLUNGER.

13 THE POINT IS BACK IN THE DAY IT PROBABLY
14 WAS CONSIDERABLY SAFER, BUT TODAY WITH ALL THE EXTRA
15 ADDITIVES, THAT'S WHAT WE WANT TO HAVE A CHANCE TO
16 EXPLORE BECAUSE WE BELIEVE WE CAN SHOW REAL EASILY THAT
17 FORMALDEHYDE IS DANGEROUS TO PUT IN THE VACCINE. AND SO
18 IS MERCURY, AND SO ALUMINUM. THEY WERE NOT IN THE
19 VACCINES IN THE 1905 CASE AND THE 1922 CASE, AND SO
20 FORTH.

21 I WOULD ALSO ADD IT'S AMAZING WHAT OPPOSING
22 COUNSEL SAID ABOUT COMMON KNOWLEDGE. I DON'T KNOW IF HE
23 MISSPOKE, BUT HE SAID IT'S WHAT'S HELD BY THE PEOPLE AS
24 EVIDENCED THROUGH THEIR ACTS. AND I'M PRESUMING HE
25 MEANS LEGISLATIVE ACTS. I DON'T KNOW IF HE MISSPOKE,
26 BUT THEY'RE NOT SUBMITTING ANY ACTS THEY WANT THE COURT
27 TO TAKE JUDICIAL NOTICE OF. THEY WANT THE COURT TO TAKE
28 JUDICIAL NOTICE OF PROPAGANDA FROM THE C.D.C. AND THE

1 WORLD HEALTH ORGANIZATION. THOSE ARE NOT LEGISLATIVE
2 ACTS.

3 I WOULD SAY ALSO ON THE ISSUE OF COMMON
4 KNOWLEDGE, IF A PERSON WERE ALIVE IN 1905, YES, I WOULD
5 AGREE THAT THE COMMON KNOWLEDGE WAS THAT VACCINES ARE
6 THE BEST PREVENTATIVE, BUT THAT'S NO LONGER THE CASE
7 WITH ALL OF THESE VACCINES THAT HAVE SO MUCH POISON IN
8 THEM, SO MANY EXTRA ADDITIVES IN THE VIAL.

9 AND THE BIGGEST DIFFERENCE BETWEEN JACOBSON
10 AND TODAY IS SIMPLY THAT IN JACOBSON, IT WAS A TEMPORARY
11 SUSPENSION OF CIVIL RIGHTS. THIS IS SIGNIFICANT. IT
12 WAS A \$5 FINE. MY CLIENTS WOULD BE HAPPY TO PAY A FINE
13 AND GO BACK ON WITH THEIR WAY. THIS CALLS FOR A
14 PERMANENT ABROGATION OF THE RIGHT TO GO TO SCHOOL, A
15 PERMANENT LOSS OF CIVIL RIGHTS WHICH MAKES IT A PENALTY.
16 IN JACOBSON IT WAS A TEMPORARY SUSPENSION. HOW LONG DID
17 THE SUSPENSION OF CIVIL RIGHTS LAST IN CAMBRIDGE,
18 MASSACHUSETTS? WELL, UNTIL THE OUTBREAK HAD CEASED.
19 AND ACCORDING TO THE LEGISLATIVE RECORD, TO WHICH WE DID
20 NOT OBJECT, THEY SAID THE OUTBREAK IS OVER.

21 THE FACT THAT THE OUTBREAK IS OVER, IT
22 ENDED BEFORE THEY STARTED THE LEGISLATION. IT'S ONLY A
23 MEANS FOR THE NATIONAL VACCINE INDUSTRY TO MAKE MORE
24 MONEY TO INCREASE THEIR PROFITS BY FORCING THEIR PRODUCT
25 UPON CHILDREN.

26 AND WITH RESPECT, IF A PERSON HAD THE LAST
27 NAME NIKE, AS IN THE SHOES, AND THE SACRAMENTO
28 LEGISLATURE PASSED A LAW THAT SAYS ALL SCHOOLCHILDREN

1 MUST WEAR NIKES, AND LET'S SAY THEY HAD CHEMICALS IN
2 THEM, YOU KNOW, AND SAID, BY THE WAY, IF YOU SLIP AND
3 FALL AND GET HURT BY THE NIKES, YOU CAN'T SUE. THAT IS
4 EXACTLY WHAT WE'RE UP AGAINST -- THIS FASCIST
5 TOTALITARIAN NOTION OF EVERYBODY MUST GET VACCINATED.

6 AND WITH RESPECT, THIS HAS TO BE THE
7 GREATEST SLIPPERY SLOPE OF ALL OF TIME, AND WE BELIEVE,
8 IF THE COURT ALLOWS THIS DECISION, ALLOWS, RATHER
9 VALIDATES, THIS LAW, THEN I BELIEVE WITHIN 18 MONTHS
10 THERE'S NOTHING STOPS THE LEGISLATURE FROM SAYING WELL,
11 IN A PUBLIC PLACE LIKE A COURTROOM HERE, MEASLES CAN BE
12 SPREAD. AND I WOULD ANTICIPATE IN 18 MONTHS THEY'RE
13 GOING TO MAKE ALL OFFICERS OF THE COURT AND ALL COUNTY
14 PERSONNEL BE VACCINATED, AND AT THE CURRENT TRAJECTORY,
15 IF THE COURT LOOKS AT ONE OF OUR EXHIBITS, THE FINAL
16 ONE, THE FIFTH EXHIBIT -- IF I COULD CALL THE COURT'S
17 ATTENTION TO THAT VERY BRIEFLY -- IN OUR LIST OF
18 EXHIBITS IT SHOWS A LIST OF HOW MANY VACCINES PEOPLE GOT
19 IN THE '60S. THERE WAS LIKE 7 VACCINES. TODAY, THERE'S
20 79 VACCINES.

21 THE IDEA OF GETTING, YOU KNOW, FIVE
22 VACCINES BACK IN THE '60S AND HAVE A PERSONAL-BELIEF
23 EXEMPTION IS SOMETHING THAT WE DON'T OBJECT TO. WE
24 THINK THAT IS LAWFUL TO HAVE A SITUATION WHERE YOU'RE
25 GETTING A HANDFUL OF VACCINES AND YOU CAN OPT OUT.

26
27 (INTERRUPTION IN THE PROCEEDINGS
28 FOR EMERGENCY EVACUATION DRILL.)

1
2 **MR. RICH:** JUST A QUESTION, YOUR HONOR. IS THE
3 COURT ADOPTING ITS TENTATIVE?

4 **THE COURT:** I WAS GOING TO PUT SOMETHING IN ABOUT
5 THE STATEMENT OF DECISION.

6 **MR. RICH:** ALL RIGHT. I JUST WANT --

7 **THE COURT:** -- I'LL PUT IN SOME LANGUAGE ABOUT
8 THAT.

9 SO DO YOU WANT TO COME BACK? I THINK I
10 KNOW THE ANSWER, BUT WE HAVE TO GO.

11 SO DO YOU WANT TO COME BACK?

12 **MR. PHILLIPS:** DOES THE COURT HAVE ANY SPECIFIC
13 QUESTIONS ABOUT THE VACCINE PROCESS OR --

14 **THE COURT:** CANDIDLY, THIS IS PROBABLY NOT THE
15 TIME FOR ME TO ENGAGE IN THAT. IF YOU WANT TO COME
16 BACK, IT'S OKAY WITH ME. IT'S --

17 **MR. PHILLIPS:** YES, WE WOULD LIKE TO. YES.

18 **THE COURT:** ABOUT 45 MINUTES.

19 **MR. RICH:** 45 MINUTES.

20
21 (EMERGENCY EVACUATION DRILL.)

22
23 **THE COURT:** BACK ON THE RECORD. BOTH SIDES ARE
24 PRESENT, AND WE'RE CONTINUING.

25 **MR. RICH:** GOOD AFTERNOON, YOUR HONOR.

26 **MR. PHILLIPS:** GOOD AFTERNOON, YOUR HONOR.

27 **THE COURT:** DO YOU WANT TO PROCEED?

28 **MR. PHILLIPS:** MAY I CONTINUE, YOUR HONOR?

1 **THE COURT:** SURE. PLEASE.

2 **MR. PHILLIPS:** THANK YOU.

3 WHERE I LEFT OFF, WHAT I WANTED TO SAY --
4 I'VE HAD A CHANCE TO REGROUP A LITTLE BIT AND THINK
5 ABOUT IT.

6 THIS IS A CASE OF FIRST IMPRESSION. THERE
7 HAS BEEN NO CASE WITH THE FACTS THAT ARE BEFORE THE
8 COURT NOW. AND YES, THERE IS A LITANY OF CASES AND
9 COUNSEL, OPPOSING COUNSEL, CORRECTLY CITES THOSE AND THE
10 PROPOSITION FOR WHICH THEY STAND. AND WE WOULD
11 REITERATE WHAT I SAID EARLIER. WE BELIEVE THAT
12 MANDATORY VACCINATION IN CALIFORNIA FROM 1961 UP UNTIL
13 THIS YEAR -- THAT IT IS CONSTITUTIONAL BECAUSE OF THE
14 PERSONAL-BELIEFS EXEMPTION.

15 IN THE CASES MY COLLEAGUE CITED, HE WOULD
16 SAY, WELL, THIS STANDS FOR THE PROPOSITION THAT
17 MANDATORY VACCINATION IS NOT UNCONSTITUTIONAL, BUT SOME
18 OF THESE CASES HAVE PERSONAL-BELIEFS EXEMPTIONS. THEY
19 MAY HAVE -- IF, FOR EXAMPLE, WITH THE JACOBSON CASE, I
20 THINK I MAY BE RETREADING SOME OF THIS, BUT IT WAS A
21 ONETIME FINE. IT WASN'T A SITUATION WHERE YOU WOULD
22 COMPLETELY LOSE YOUR RIGHTS TO GO TO SCHOOL.

23 ALSO, BACK IN 1905, THERE WAS NO NATIONAL
24 CHILDHOOD VACCINATION INJURY ACT, AND I KNOW WE'VE GIVEN
25 A LOT OF WEIGHT TO THAT. I DIDN'T WANT TO TOO MUCH
26 BELABOR THE POINT, BUT IN THE 1986 ACT, SPECIFICALLY
27 UNDER 42 USC, THE PORTION THAT MR. RICH READ, IF I CAN
28 READ IT ALOUD AGAIN, PARAPHRASING. IT SAYS:

1 NO VACCINE MANUFACTURER SHALL
2 BE LIABLE IF THE INJURY OR DEATH
3 RESULTED FROM SIDE EFFECTS THAT WERE
4 UNAVOIDABLE.

5 AND THIS CASE HELD THAT THE PETITIONER
6 COULD NOT PREVAIL; SO IF WE LOGICALLY DEDUCE WHAT
7 THEY'RE SAYING, IF THE INJURY OR DEATH RESULTED FROM
8 SIDE EFFECTS THAT WERE UNAVOIDABLE, WELL, SIDE EFFECTS
9 MUST BE UNAVOIDABLE HERE. THAT'S THE CONCLUSION YOU CAN
10 REACH. WHAT I WOULD POINT OUT IS IN THAT PARAGRAPH,
11 AGAIN:

12 NO VACCINE MANUFACTURER SHALL
13 BE LIABLE.

14 THE HEADING ABOVE THAT READS:

15 UNAVOIDABLE ADVERSE SIDE
16 EFFECTS.

17 SO THIS COMES UNDER THE HEADING -- THE
18 PEOPLE THAT AUTHORED IT -- AGAIN, I THINK IT'S POORLY
19 WRITTEN -- BUT THE HEADING, TO THE EXTENT IT HAS
20 PROBATIVE VALUE, IT DOES TELL THE READER WHERE YOU'RE
21 GOING.

22 UNDER THE HEADING OF "UNAVOIDABLE ADVERSE
23 SIDE EFFECTS," IT SAYS:

24 NO VACCINE MANUFACTURER SHALL
25 BE LIABLE IF THE INJURY OR DEATH
26 RESULTED FROM SIDE EFFECTS THAT WERE
27 UNAVOIDABLE.

28 AND, YES, MY ABLE COLLEAGUE EXACTLY

1 IDENTIFIED THE HOLDING THAT SAYS:

2 ALL PATENT DEFECT CLAIMS ARE
3 PREEMPTED.

4 AND SO BASICALLY WHAT THAT MEANS IS NOBODY
5 IN AMERICA COULD EVER CHALLENGE A DESIGN OF A VACCINE.
6 VERY LITERALLY, MERCK, OR PFIZER, GLAXOSMITHKLINE COULD
7 PUT NUCLEAR WASTE IN A VACCINE. THEY COULD PUT, YOU
8 KNOW, PENCIL SHAVINGS, I MEAN, ANYTHING YOU COULD THINK
9 OF THAT WOULD BE RIDICULOUS, AND THERE WOULD BE
10 ABSOLUTELY NO POSSIBILITY TO BRING A CLAIM, WHETHER IN
11 THE VACCINE COURT OR IN AT THE STATE COURT LEVEL FOR A
12 PRODUCTS LIABILITY SUIT.

13 SO WE HAVE TO ASK OURSELVES: WHY IS THIS?
14 WHY ARE THEY GIVEN IMMUNITY? AND VERY LITERALLY, LIKE
15 SCALIA SAYS, NOT JUST IMMUNITY IN THE LEGAL CONCEPT, BUT
16 SCALIA USES THE WORD "IMMUNIZATION." WHY ARE WE
17 IMMUNIZING THEM FROM LIABILITY? WELL, IT SEEMS TO ME
18 THE ANSWER HAS TO BE BECAUSE VACCINES, ALL VACCINES,
19 HAVE UNAVOIDABLE ADVERSE SIDE EFFECTS.

20 AND NO CASE THAT I KNOW HAS MADE THIS
21 ARGUMENT UNDER THE BRUSOWITZ CASE BECAUSE IT'S SO
22 RECENT. CONSPICUOUSLY, IN THE 2015 CASE, THE PHILLIPS
23 CASE -- NO RELATION TO ME. IT WAS A NEW YORK CASE. IN
24 THAT CASE, THEY NEVER ONCE ARGUED THIS IDEA OF VACCINE
25 SAFETY, AND QUITE FRANKLY, I BELIEVE THAT THOSE CASES
26 WERE SET UP TO LOSE ON PURPOSE TO CREATE A PRECEDENT. I
27 KNOW THAT MUST SOUND A LITTLE BIT OUTLANDISH.

28 IF THE COURT WILL GRANT ME A LITTLE LEAVE

1 TO EXPLORE THIS, WE OBJECT TO THE SAN DIEGO CASE, THE
2 FEDERAL CASE IN SAN DIEGO IS NOT BINDING ON THIS COURT.
3 IT'S A DIFFERENT TRAIN ON A DIFFERENT TRACK IN FEDERAL
4 COURT, AND IF THE COURT CAN LOOK AT THIS JUST FOR A
5 MOMENT, I COULD PROBABLY EXPLAIN IT.

6 THEY HAD FIVE LAWYERS IN THAT SAN DIEGO
7 CASE. FIVE SEASONED ATTORNEYS, ALL OF THEM PRACTICING
8 LONGER THAN I HAVE. THESE ARE FROM THREE DIFFERENT LAW
9 FIRMS, AND YET, IF YOU LOOK AT THE COMPLAINT, FOR
10 EXAMPLE, CAUSE OF ACTION NO. 1 IN THIS WITLOW (PHONETIC)
11 CASE, UNDER CAUSE OF ACTION NO. 1 THEY WOULD HAVE
12 VIOLATION OF PARENTAL RIGHTS, VIOLATION OF FIRST
13 AMENDMENT, 42 USC 1983 DAMAGES, NEGLIGENCE. THEY WOULD
14 HAVE, LIKE, FOUR DIFFERENT THINGS IN ONE CAUSE OF
15 ACTION.

16 NOW, WE ALL KNOW THE BASIC RULES OF
17 PLEADING. YOU HAVE ONE CAUSE OF ACTION OR ONE THING,
18 LIKE: CAUSE OF ACTION NO. 1, NEGLIGENCE, CAUSE OF
19 ACTION NO. 2 -- THE COMPLAINT WAS SO POORLY DRAFTED, ONE
20 HAS TO WONDER, YOU KNOW; AND YET THE STATE NEVER
21 CHALLENGED IT FOR INTELLIGIBILITY.

22 THEY ALSO HAD 24 PLAINTIFFS, INDIVIDUAL
23 PLAINTIFFS, AND FOUR CORPORATE PLAINTIFFS, WHICH IS KIND
24 OF REMARKABLE BECAUSE I CAN'T IMAGINE HOW THESE
25 CORPORATE PLAINTIFFS, OUT-OF-STATE CHARITIES
26 INCORPORATED IN NEVADA, THESE NEVADA OUT-OF-STATE
27 CORPORATIONS -- THERE'S THREE OF THEM THAT WE'RE SUING.
28 THERE'S NO STANDING.

1 THE POINT I'M TRYING TO MAKE, WITHOUT GOING
2 TOO FAR AFIELD IS, WE BELIEVE THAT CASE WAS SET UP FOR
3 THE SOLE PURPOSE OF CREATING A PRECEDENT. THEY NEVER
4 FOUGHT IT VERY HARD. THEY BASICALLY ARGUED OUR FIRST
5 TWO CAUSES OF ACTION. AGAIN, WE RECOGNIZE THAT IT'S AN
6 UPHILL BATTLE. OUR FIRST CAUSE OF ACTION IS FOR
7 RELIGION, FREEDOM OF RELIGION UNDER THE STATE
8 CONSTITUTION, AND ALSO, WE'RE ARGUING THE CHILDREN'S
9 RIGHT TO GO TO SCHOOL UNDER THE CALIFORNIA CONSTITUTION.

10 AND I BELIEVE, IF WE WERE TO MAKE THAT
11 ARGUMENT IN THE SAME WAY THAT THEY DID IN THE SAN DIEGO
12 CASE, THAT WE WOULD BE DESTINED TO LOSE. AND IT'S
13 CURIOUS NOW BECAUSE YOU CAN SEE THESE LAWYERS, YOU CAN
14 SEE THEM ON THE INTERNET, AND THESE LAWYERS THAT
15 PROSECUTED THIS CASE IN SAN DIEGO -- THEY'RE TALKING,
16 SAYING THEY WERE MANIPULATED INTO BRINGING A CASE THEY
17 DIDN'T WANT TO BRING. IT'S THE MOST REMARKABLE
18 THING I'VE EVER HEARD. I WASN'T SURE HOW THE COURT
19 WOULD TAKE THIS BECAUSE I KNOW IT MUST SOUND A LITTLE
20 BIT OUTLANDISH.

21 BUT MY POINT IS THAT, FROM EVERY OUTWARD
22 APPEARANCE, THEY REALLY DIDN'T TRY VERY HARD. AND THEY
23 ACKNOWLEDGED THAT THEY WERE MANIPULATED. THEY SAY THEY
24 WANTED TO BRING A CASE ABOUT VACCINE SAFETY BUT THEY
25 WERE FORBIDDEN TO DO SO. IT SEEMS TO ME THAT THOSE
26 ATTORNEYS WERE NOT EXERCISING INDEPENDENT LEGAL
27 JUDGMENT, BUT FOR WHATEVER IT'S WORTH, WE THINK THE
28 SAN DIEGO CASE HAS ABSOLUTELY NO PRECEDENTIAL VALUE.

1 AND AGAIN, I THINK IN CLOSING HERE, THE --
2 AGAIN, THE MAJORITY OF CASES -- I THINK I MAY BE
3 REPEATING SOME OF THESE THING. THERE WAS ONLY THE
4 VIRUS. IN THE MAJORITY OF THE CASES THAT THE STATE HAS
5 CITED, IT'S JUST THE IDEA OF GETTING A VIRUS AND NOT ALL
6 THE ADDITIVES.

7 WHAT I WANTED TO SHOW, ALSO, IS OUR
8 EXHIBIT F, IF I COULD HOLD IT UP FOR THE BENEFIT OF THE
9 COURT. AND I THINK MY COLLEAGUES HAVE SEEN IT.

10 THIS IS VERY ILLUSTRATIVE. BACK IN 1960
11 THERE WAS EIGHT DIFFERENT VACCINES. 2016, THERE'S OVER
12 SEVENTY. THIS IS FROM 30 YEARS OF NEVER BEING
13 CHALLENGED, YOU KNOW. WE HAVE TO ASK OURSELVES WHY DOES
14 THE 1986 ACT EXIST. IF THE 1986 ACT DIDN'T EXIST, THEY
15 WOULD LOSE EVERY LAWSUIT. THAT'S BECAUSE VACCINES ARE
16 UNAVOIDABLY UNSAFE. THAT WAS THE RATIONALE IN
17 IMMUNIZING THE NATIONAL VACCINE MARKET FROM LIABILITY.

18 AND ONCE THE COURT UNDERSTANDS,
19 RESPECTFULLY, WHY IT IS THAT THEY HAVE THIS IMMUNIZATION
20 OF LIABILITY, IT'S BECAUSE VACCINES ARE UNSAFE. I'VE
21 HAD, AGAIN, A LOT OF TIME TO TALK ABOUT THIS WITH
22 MR. RICH. WE'VE ARGUED ABOUT IT BACK AND FORTH AND
23 TRYING TO BE RESPECTFUL THE WHOLE TIME, BUT I'VE PRESSED
24 MY COLLEAGUE, AND I'VE ASKED HIM, "WELL, MR. RICH, IN
25 THE BRUSOWITZ CASE THEY HAVE DIATRIBES ABOUT
26 "UNAVOIDABLY UNSAFE." WHAT DOES IT MEAN?"

27 SCALIA GOES TO LENGTHS IN SAYING YOU CAN
28 REMOVE THE ADVERB "UNAVOIDABLY" AND YOU JUST HAVE

1 "UNSAFE." YOU KNOW, VACCINES ARE UNSAFE. THE POINT IS
2 I'VE ASKED MR. RICH: WHAT DOES "UNAVOIDABLY UNSAFE"
3 REFER TO? IT MUST REFER TO SOMETHING BECAUSE THEY'RE
4 TALKING ABOUT IT, BUT THE ONLY RESPONSE WE GET BACK IS
5 THAT, WELL, BRUSOWITZ STANDS FOR THE PROPOSITION THAT
6 ALL DESIGN DEFECTS CLAIMS ARE PREEMPTED AND YOU CAN'T --
7 THAT'S TRUE.

8 BUT WHY ARE THEY DOING THAT? AND I THINK
9 THE ANSWER IS BECAUSE ALL VACCINES ARE INHERENTLY
10 UNSAFE. AND MY CLIENTS ARE TESTIMONY OF THAT. I HAVE
11 CLIENTS THAT HAVE VACCINE-INJURED CHILDREN. AND IN
12 EVERY INSTANCE, THE MEDICAL PROFESSION SAYS, WELL, IT
13 COULD HAVE BEEN A COINCIDENCE. MOST CHILDREN HAVE
14 VACCINES. IT MAY BE A PROXIMITY TIME-WISE. THERE'S NO
15 CAUSATION. YOU CAN'T PROVE CAUSATION.

16 BUT PARENTS KNOW. WHEN A MOM OR A DAD
17 TAKES THEIR CHILD AND THEY GET VACCINATED, THE CHILD
18 PASSES OUT IN THE BACKSEAT, THEIR LEG IS SWOLLEN AT THE
19 INJECTION SITE. THEY HAVE A FEVER. THEY'RE VOMITING,
20 AND THEY HAVE DIARRHEA, AND THEY NEVER RECOVER, AND
21 THEY'RE JUST STARING AT A WALL THE REST OF THEIR LIFE.
22 THE PARENTS KNOW.

23 BUT THERE'S NO MEANS TO PROVE THAT. AND
24 WHAT I FIND SO OFFENSIVE, TOO, IS IN THE BRUSOWITZ CASE,
25 SCALIA SAYS THIS IS AN EASIER WAY, EASIER WAY FOR
26 PLAINTIFFS TO FACILITATE THE PLAINTIFFS' ACCESS TO
27 JUSTICE, FACILITATE THEM GETTING COMPENSATION. THIS
28 DOES NOT -- THE NATIONAL VACCINE ACT DOES NOT FACILITATE

1 ANYTHING FOR PLAINTIFFS, IF FOR -- FOR NO OTHER REASON
2 THAN THIS: THERE'S ONLY ONE COURTHOUSE FOR THE NATIONAL
3 VACCINE ACT. THAT'S IN WASHINGTON, D.C.

4 IF SOMEBODY GOT HURT BY A VACCINE, YOU
5 KNOW, BEFORE THE ACT, THEY COULD HAVE GONE TO THE
6 STANLEY MOSK -- PROBABLY WASN'T CALLED THAT BACK THEN --
7 BUT THEY COULD HAVE COME TO THE LOCAL COUNTY COURTHOUSE.
8 THE ONLY WAY TO GET REDRESS IS TO GO 3,000 MILES AWAY.
9 THE POINT IS IT DOESN'T MAKE IT EASIER, ANY EASIER, AND
10 WE SUSPECT THAT'S BECAUSE THEY DON'T WANT TO BE SUED.
11 THE MAJORITY OF THESE CASES ARE FROM THE EAST COAST.

12 IT'S HARD TO HIRE A VACCINE LAWYER WHEN
13 THEY'RE ALL IN THE WASHINGTON, D.C. AREA. HOW DO YOU
14 MEET WITH THEM? YOU KNOW, ANYWAY, WITHOUT GOING TOO FAR
15 AFIELD, WE BELIEVE THAT, IF THE COURT ASKED THE QUESTION
16 WHY ARE THEY LETTING THE VACCINE MANUFACTURERS OFF THE
17 HOOK -- NO OTHER INDUSTRY IN THE HISTORY OF THE WORLD
18 HAS EVER ENJOYED THIS KIND OF IMMUNIZATION FROM
19 LIABILITY.

20 AND WHEN I READ THE C.D.C. LITERATURE
21 SAYING AMERICA HAS THE MOST SAFEST, THE MOST EFFICACIOUS
22 VACCINES IN HISTORY, THE MOST SAFEST -- WELL, WHY DON'T
23 THEY PUT THEIR MONEY WHERE THEIR MOUTH IS, AS IT WERE?
24 IF THEY WERE REALLY THAT SAFE, THEY WOULDN'T NEED THIS
25 IMMUNIZATION FROM LIABILITY, AND WE BELIEVE THAT THE ACT
26 -- I MAY BE REPEATED MYSELF. AT THE RISK BEING TOO
27 REDUNDANT -- BUT THE EXISTENCE, THE MERE EXISTENCE OF
28 THE NATIONAL CHILDHOOD VACCINE INJURY ACT, THAT IS PROOF

1 THAT VACCINES ARE UNSAFE.

2 AND WITH THAT, WE WOULD RESPECTFULLY
3 SUBMIT. AND THANK YOU, YOUR HONOR.

4 **THE COURT:** COUNSEL.

5 **MR. RICH:** JUST SOME VERY SPECIFIC POINTS.

6 FIRST OF ALL, THIS CASE IS NOT A CASE OF
7 FIRST IMPRESSION. I WON'T BELABOR THE POINT, BUT ON
8 PAGE 6 OF OUR DEMURRER, WE'VE LISTED A LITANY OF CASES
9 THAT HAVE UPHELD CHALLENGES TO MANDATORY VACCINATION
10 STATUTES PREDICATED ON PURPORTED VIOLATIONS OF THE FIRST
11 AMENDMENT, FREEDOM OF RELIGION, EQUAL PROTECTION LAWS,
12 DUE PROCESS, FOURTH AMENDMENT, EDUCATION RIGHTS,
13 PARENTAL RIGHTS, PRIVACY RIGHTS. ALL OF THEM HAVE
14 UPHELD MANDATORY VACCINATION STATUTES.

15 SECONDLY, WITH REGARD TO COUNSEL'S ARGUMENT
16 THAT SOMEHOW JACOBSON IS DISTINGUISHABLE BECAUSE IT HAD
17 TO DO WITH THE SMALLPOX VACCINE AND THESE OTHER CASES
18 DON'T DEAL WITH THE VACCINATIONS AT ISSUE, I WOULD POINT
19 TO PAGES 2 AND 3 OF OUR REPLY WHERE WE'VE INDICATED, IN
20 FACT, A LITANY OF THESE CASES THAT IN THE 20TH AND 21ST
21 CENTURIES THAT HAVE HELD MANDATORY VACCINATION STATUTES
22 THAT HAVE SOME, IF NOT ALL, OF THE VACCINES THAT ARE
23 REQUIRED UNDER SB-277 AND THEY ARE NOT LIMITED TO
24 SMALLPOX.

25 WITH REGARD, FINALLY, TO THE NATIONAL
26 VACCINATION COMPENSATION ACT, COUNSEL IS ENTIRELY -- NOT
27 ONLY HAS MISSTATED BRUSOWITZ BUT HAS MISSTATED THE ACT.
28 AND EVEN THOUGH IT'S NOT RELEVANT, I DO WANT, FOR THE

1 COURT'S PEACE OF MIND TO UNDERSTAND -- AND I'M READING
2 FROM THE MAJORITY DECISION IN BRUSOWITZ:

3 TO STABILIZE THE VACCINE MARKET
4 AND FACILITATE COMPENSATION, CONGRESS
5 ENACTED THE N.C.V.I.A. IN 1986.

6 IT ESSENTIALLY SAYS IT ESTABLISHES A
7 NO-FAULT COMPENSATION SYSTEM, BUT THEN -- AT THAT POINT,
8 THEN, THE FEDERAL COURT OF CLAIMS REVIEWS THE FINDINGS
9 OF SPECIAL MASTERS. BUT THEN IT SAYS:

10 AT THAT POINT THE COMPLAINANT
11 HAS TWO OPTIONS: TO ACCEPT THE COURT'S
12 JUDGMENT AND FORGO A TRADITIONAL TORT
13 JUDGMENT OR TO REJECT THE JUDGMENT AND
14 SEEK TORT RELIEF FROM THE VACCINE
15 MANUFACTURERS.

16 SO EVERYTHING -- ALL OF THESE COMPLAINTS
17 THAT PLAINTIFFS DON'T HAVE RECOURSE ON THIS VACCINATION
18 ACT, WHICH IS OF NO RELEVANCE WHATSOEVER TO THIS CASE,
19 IS UNTRUE.

20 WITH THAT, YOUR HONOR, WE SUBMIT AND ASK
21 THE COURT TO ADOPT ITS TENTATIVE.

22 **MR. PHILLIPS:** I PROMISE TO BE BRIEF.

23 WHEN WE STATE "FIRST IMPRESSION," NOBODY
24 HAS EVER ARGUED THAT VACCINES ARE UNSAFE. THE 2015
25 CASE, PHILLIPS VS. NEW YORK, THE ATTORNEY PATTY THIN
26 (PHONETIC) NEVER ARGUED THAT ALL VACCINES ARE
27 UNAVOIDABLY UNSAFE. THIS IS A CASE OF FIRST IMPRESSION
28 WHERE A PERSONAL BELIEF EXEMPTION HAS BEEN REMOVED, AND

1 WE ARE ARGUING THAT ALL VACCINES ARE UNAVOIDABLE UNSAFE.
2 THAT IS OUR ARGUMENT, AND WE BELIEVE IT COMES DOWN TO
3 THAT.

4 IF I COULD BRING UP ONE HOUSEKEEPING
5 MATTER, JUST UNRELATED. WE'RE PREPARED TO SUBMIT.

6 WE WOULD ASK THE COURT, RESPECTFULLY, TO
7 ADMONISH THE MEMBERS OF THE AUDIENCE THAT ARE PRESENT,
8 THAT IT'S UNLAWFUL FOR THEM TO TAPE RECORD OR TAKE
9 PICTURES IN THE COURTHOUSE. WE UNDERSTAND THAT IT'S
10 FORBIDDEN TO DO THAT. THE LAST THREE OR FOUR TIMES I'VE
11 APPEARED IN COURT, PEOPLE ARE TAKING MY PICTURE AND
12 THEY'RE PUTTING IT UP AND -- FOR EMBARRASSING AND TRYING
13 TO --

14 **THE COURT:** I DON'T KNOW ANYTHING ABOUT THAT, BUT
15 HAVE YOU MENTIONED IT TO ANYBODY WHEN IT HAPPENED?

16 **MR. PHILLIPS:** YES, I HAVE, AND ONE PERSON HAS --

17 **THE COURT:** IT'S THE STAFF, THE COURT STAFF COULD
18 DO SOMETHING WITH IT.

19 **MR. PHILLIPS:** IT USUALLY HAPPENS AFTER THE
20 FACT --

21 **THE COURT:** OUTSIDE?

22 **MR. PHILLIPS:** WELL, NO. IT HAPPENED -- SOMEBODY
23 PRESENT WILL TAKE A PICTURE OR TAPE RECORD MY VOICE --
24 IT'S HAPPENED SEVERAL TIMES -- AND THEN THEY POST IT ON
25 THE INTERNET. NOW WHEN I GO TO COURT, I ASK THE JUDGE
26 TO GIVE THE ADMONISHMENT. SOMEBODY DID IT AGAIN, AND
27 NOW THEY'RE FACING MISDEMEANOR CHARGES.

28 AND SO WE WERE HOPING THAT THE COURT WOULD

1 CLARIFY THAT IT'S UNLAWFUL TO TAKE PICTURES AND
2 RECORD PEOPLE --

3 **THE COURT:** WELL, I THINK THAT'S PRETTY SAFE,
4 WITHOUT COURT PERMISSION, BUT I HAVEN'T BEEN PRESENTED
5 THIS AS BEING AN ISSUE. AND --

6 **THE CLERK:** YOUR HONOR, IT HAS NOT BEEN BROUGHT TO
7 OUR ATTENTION.

8 **THE COURT:** YOU HAVEN'T BROUGHT THIS -- IS THIS
9 SOME OTHER COURT THAT THIS HAPPENED IN?

10 **MR. PHILLIPS:** IT'S HAPPENED IN OTHER COURTS, YES,
11 BUT I WAS HOPING TO HAVE A CHAMBERS CONFERENCE LAST TIME
12 AND DISCUSS IT BECAUSE IT'S BEEN AN ISSUE.

13 **THE COURT:** I REMEMBER THERE WAS A QUESTION FOR A
14 CHAMBERS CONFERENCE IN THIS CASE.

15 YEAH, BUT I DON'T KNOW ANYTHING ABOUT IT;
16 SO IT HASN'T HAPPENED HERE, BUT IT MAY HAPPEN IN THE
17 FUTURE OR IT'S HAPPENED IN THE PAST OR --

18 **MR. PHILLIPS:** IT'S HAPPENED EVER SINCE I'VE TAKEN
19 ON THE VACCINE CASE. EVERY TIME I GO TO COURT NOW,
20 SOMEBODY, PRESUMABLY FROM THE VACCINE LOBBY OR THAT CAMP
21 IS WANTING TO TAKE PICTURES AND EMBARRASS ME AND RECORD
22 MY VOICE AND TAKE IT OUT OF CONTEXT, AND I THOUGHT THAT
23 IT WOULD BE APPROPRIATE THAT YOUR HONOR --

24 **THE COURT:** DO YOU KNOW ALL THE PEOPLE IN THE
25 COURTROOM?

26 **MR. PHILLIPS:** NO, I DO NOT. I KNOW THESE PEOPLE
27 HERE. I DO NOT KNOW THE PEOPLE ON THE OTHER SIDE, BUT
28 I'M PRESUMING THAT THEY ARE WITH THE NATIONAL VACCINE

1 LOBBY.

2 IT'S PROBABLY NONE OF MY BUSINESS, BUT I
3 THOUGHT FOR WHATEVER PROBATIVE VALUE THAT, IF --

4 **THE COURT:** WELL, I HAVE TO DEAL WITH THINGS AS
5 THEY HAPPEN.

6 **MR. RICH:** YOUR HONOR, THE TWO GENTLEMAN IN THE
7 COURTROOM ARE WITH THE ATTORNEY GENERAL'S OFFICE.

8 **THE COURT:** PROBABLY NOT THE ISSUE.

9 SO IN ANY EVENT, I DEAL WITH THESE THINGS
10 AS THEY HAPPEN, IF THEY HAPPEN. I THINK I HAD A LAWYER
11 TAPING THE COURT PROCEEDINGS, AND WE SAID HE HAD TO GET
12 PERMISSION. I DON'T REMEMBER ANYBODY TAKING PICTURES
13 EVER. BUT I'LL DEAL WITH THESE THINGS IF IT'S AN ISSUE.
14 JUST LET US KNOW.

15 **MR. PHILLIPS:** ALL RIGHT.

16 **THE COURT:** THANK YOU, COUNSEL. I'LL GET A RULING
17 OUT TODAY.

18 **MS. YOUNG:** THANK YOU, YOUR HONOR.

19 **MR. RICH:** THANK YOU, YOUR HONOR.

20
21 (WHEREUPON THE MATTER WAS
22 CONCLUDED.)

23
24 -000-
25
26
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DISMANTLING OF THIS TRANSCRIPT VOIDS THIS CERTIFICATE

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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

DEPARTMENT 36

HON. GREGORY W. ALARCON

TAMARA BUCK, SHARON BROWN, SARAH)
LUCAS, CHARLENE HOUSEN DAWNIELLE)
SELDEN, SERGE EUSTACHE, TRICIA)
EUSTACHE, AND NIKKI JENCEN,)

PLAINTIFFS,)

VS.)

CASE NO. BC 617 766

THE STATE OF CALIFORNIA, AND)
DOES 1-99, INCLUSIVE,)

DEFENDANTS.)
_____)

REPORTER'S CERTIFICATE

I, KATHLEEN SMITH-MYLER, COURT REPORTER PRO
TEMPORE FOR THE SUPERIOR COURT OF THE STATE OF
CALIFORNIA FOR THE COUNTY OF LOS ANGELES, DO HEREBY
CERTIFY THAT THE FOREGOING PAGES COMPRISE A FULL, TRUE,
AND CORRECT TRANSCRIPT OF THE PROCEEDINGS TAKEN IN THE
ABOVE-ENTITLED CAUSE ON OCTOBER 20, 2016.

DATED OCTOBER 31, 2016.

KATHLEEN SMITH-MYLER, CSR 12500
COURT REPORTER PRO TEMPORE

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