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8 **SUPERIOR COURT OF CALIFORNIA**

9 **COUNTY OF LOS ANGELES – STANLEY MOSK COURTHOUSE**

10 \_\_\_\_\_ ) **Case No: BC 617766**  
11 **TAMARA BUCK,** )  
12 **SHARON BROWN,** )  
13 **SARAH LUCAS,** ) **PLAINTIFF'S**  
14 **CHARLENE HOUSEN,** ) **REQUESTS FOR ADMISSIONS**  
15 **DAWNIELLE SELDEN,** ) **[SET NO. ONE]**  
16 **SERGE EUSTACHE** )  
17 **TRICIA EUSTACHE,** )  
18 **NIKKI JENCEN,** )  
19 *Plaintiffs,* )  
20 **vs.** )  
21 **KAREN SMITH, in her capacity as** )  
22 **the Director of the California** )  
23 **Department of Public Health,** )  
24 **and DOES 1 – 99, inclusive,** )  
*Defendants.* )

25 PROPOUNDING PARTY: Plaintiffs

26 RESPONDING PARTY: Defendant, KAREN SMITH

27 SET NUMBER: ONE



1 REQUEST for ADMISSION No. 10:

2 Admit that, in *Jacobson vs. Massachusetts*, (1905), [197 U.S. 11],  
3 the plaintiff challenged a medical procedure that consisted of variolation  
4 with cowpox virus.

5 REQUEST for ADMISSION No. 11:

6 Admit that, as part of Cambridge’s statutorily required vaccination  
7 procedure in *Jacobson vs. Massachusetts*, (1905), [197 U.S. 11], no mercury  
8 was injected into children’s thigh muscles.

9 REQUEST for ADMISSION No. 12:

10 Admit that, as part of Cambridge’s statutorily required vaccination  
11 procedure in *Jacobson vs. Massachusetts*, (1905), [197 U.S. 11], no aluminum  
12 was injected into children’s thigh muscles.

13 REQUEST for ADMISSION No. 13:

14 Admit that, as part of Cambridge’s statutorily required vaccination  
15 procedure in *Jacobson vs. Massachusetts*, (1905), [197 U.S. 11], no phenol  
16 was injected into children’s thigh muscles.

17 REQUEST for ADMISSION No. 14:

18 Admit that, as part of Cambridge’s statutorily required vaccination  
19 procedure in *Jacobson vs. Massachusetts*, (1905), [197 U.S. 11], no GMOs  
20 (“genetically modified organisms”) were injected into children’s thigh muscles.

21 REQUEST for ADMISSION No. 15:

22 Admit that, as part of Cambridge’s statutorily required vaccination  
23 procedure in *Jacobson vs. Massachusetts*, (1905), [197 U.S. 11], no patented  
24 organisms were injected into children’s thigh muscles.

25 REQUEST for ADMISSION No. 16:

26 Admit that, as part of Cambridge’s statutorily required vaccination  
27 procedure in *Jacobson vs. Massachusetts*, (1905), [197 U.S. 11], no human DNA  
28 was injected into children’s thigh muscles.

1 REQUEST for ADMISSION No. 17:

2 Admit that, in *Jacobson vs. Massachusetts*, (1905), [197 U.S. 11],  
3 Cambridge's compulsory vaccination ordinance allowed for medical exceptions  
4 for children, (under 21 years of age).

5 REQUEST for ADMISSION No. 18:

6 Admit that, in *Jacobson vs. Massachusetts*, (1905), [197 U.S. 11],  
7 Cambridge's compulsory vaccination ordinance *did not* allow for medical  
8 exceptions for adults, (21 years of age and older).

9 REQUEST for ADMISSION No. 19:

10 Admit that, in *Jacobson vs. Massachusetts*, (1905), [197 U.S. 11],  
11 the plaintiff, Pastor Henning Jacobson, never argued freedom of religion  
12 in support of his case against the Commonwealth.

13 REQUEST for ADMISSION No. 20:

14 Admit that, in *Jacobson vs. Massachusetts*, (1905), [197 U.S. 11],  
15 plaintiff's constitutional arguments were limited to the Preamble to the  
16 Constitution and the Equal Protection Clause of the 14<sup>th</sup> Amendment.

17 REQUEST for ADMISSION No. 21:

18 Admit that there exist no random double-blind, placebo-controlled,  
19 safety studies for the vaccines listed at SB 277.

20 REQUEST for ADMISSION No. 22:

21 Admit that none of the vaccines listed at SB 277 were safety tested  
22 in combination with other vaccines.

23 REQUEST for ADMISSION No. 23:

24 Admit that, when vaccines kill children, medical science is unable to  
25 explain why.

26 REQUEST for ADMISSION No. 24:

27 Admit that, when vaccines fail to provide immunization, medical science  
28 is unable to explain why.

1 REQUEST for ADMISSION No. 25:

2 Admit that medical science is a field bereft of direct proof of how  
3 vaccines affect the human body.

4 REQUEST for ADMISSION No. 26:

5 Admit that, over the past ten years, the number of American children who  
6 died from the MMR vaccine far outpaces the number of American children who  
7 died from mumps, measles and Rubella combined.

8 REQUEST for ADMISSION No. 27:

9 Admit that the MMR vaccine is not administered to “infants,” (*i.e.*, newborn  
10 through 12 months), because it is considered medically unsafe.

11 REQUEST for ADMISSION No. 28:

12 Admit that the MMR vaccine comes in only one “size,” (*i.e.*, volume of  
13 liquid in the syringe).

14 REQUEST for ADMISSION No. 29:

15 Admit that a person can develop a full-blown case of measles as a direct  
16 consequence of having been vaccinated for measles.

17 REQUEST for ADMISSION No. 30:

18 Admit that a person vaccinated for measles can nevertheless develop a  
19 full-blown case of measles as a direct consequence of person-to-person contact  
20 with others infected with the measles virus.

21 REQUEST for ADMISSION No. 31:

22 Admit that a person vaccinated for measles can “shed” the measles virus  
23 and thus infect others for a period of approx. 28 days after vaccination.

24 REQUEST for ADMISSION No. 32:

25 Admit that, in the notorious measles outbreak at Disneyland in 2015,  
26 the majority of those afflicted were already vaccinated for measles.

1 REQUEST for ADMISSION No. 33:

2 Admit that, in the notorious measles outbreak at Disneyland in 2015,  
3 all those afflicted had contracted “laboratory” measles, (*i.e.*, from viral strains  
4 attenuated *in vitro*).

5 REQUEST for ADMISSION No. 34:

6 Admit that, once a person has had a full-blown case of “wild” measles,  
7 (*i.e.*, from naturally occurring viral strains not attenuated *in vitro*), he or she  
8 acquires lifetime immunity to the measles virus.

9 REQUEST for ADMISSION No. 35:

10 Admit that, once a person has had a full-blown case of “laboratory”  
11 measles, (*i.e.*, from viral strains attenuated *in vitro*), he or she does NOT acquire  
12 lifetime immunity to “wild” measles, (*i.e.*, naturally occurring viral strains not  
13 attenuated *in vitro*).

14 REQUEST for ADMISSION No. 36:

15 Admit that measles booster shots are unnecessary for persons who have had  
16 a full-blown case of “wild” measles, (*i.e.*, from naturally occurring viral strains not  
17 attenuated *in vitro*), because such persons already developed lifetime immunity  
18 as a direct consequence of having had the full-blown disease from a “wild” strain.

19 REQUEST for ADMISSION No. 37:

20 Admit that persons inoculated with “laboratory” measles, (*i.e.*, from viral  
21 strains attenuated *in vitro*), acquire immunity, if at all, for a period of not more  
22 than four weeks after inoculation.

23 REQUEST for ADMISSION No. 38:

24 Admit that persons inoculated with “laboratory” measles, (*i.e.*, from viral  
25 strains attenuated *in vitro*), remain forever susceptible to “wild” measles, (*i.e.*,  
26 naturally occurring viral strains not attenuated *in vitro*).

1 REQUEST for ADMISSION No. 39:

2 Admit that you, KAREN SMITH, have not received all the vaccinations that  
3 the CDC now recommends for you.

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8 Dated: **Aug. 1, 2016**

LAW OFFICES OF T. MATTHEW PHILLIPS

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12 *T. Matthew Phillips*  
13 T. Matthew Phillips, Esq.  
14 *Plaintiffs' Counsel.*

1                    *cs* DECLARATION of T. MATTHEW PHILLIPS, Esq. *so*

2 (1) My name is T. MATTHEW PHILLIPS, and I am a Plaintiff's counsel.  
3 I have read the pleadings in this lawsuit and I am familiar therewith. All  
4 allegations herein are true of my own personal knowledge. If called upon to  
5 testify, I could and would give truthful and competent evidence.

6 (2) I am propounding the attached Requests for Admission, Set Number One,  
7 to Defendant, KAREN SMITH, in connection with the above captioned case.

8 (3) Propounding this set of requests to Defendant will cause the total number of  
9 requests propounded by Plaintiffs to exceed the number of requests (35) permitted  
10 by section 2033(c)(1) of the Code of Civil Procedure.

11 (4) Requests for Admissions, Set Number One contains a total of 39 requests for  
12 admission. I am familiar with the issues presented by this case, and the previous  
13 discovery conducted by all parties in the case, (none), and I have personally  
14 examined each of the requests in Set Number One. The additional number of  
15 requests for admission contained in Set Number One is warranted under section  
16 2033(c)(2) of the Code of Civil Procedure because the issues so require.

17 (5) Plaintiffs have not served these requests for admissions for an improper  
18 purpose, such as to harass, cause unnecessary delay or a needless increase in the  
19 cost of litigation.

20 I declare under penalty of perjury under the laws of California that the  
21 foregoing is both true and correct. Executed the date and year below written—

22 Dated: **Aug. 1, 2016**

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27 T. Matthew Phillips, Esq.  
28 *Declarant.*