

## **TEXAS PUBLIC INFORMATION ACT REQUEST**

**VIA EMAIL**

November 10, 2021

Medical Center Health System  
Attn: Communications & Marketing Department  
500 West 4th Street,  
Odessa TX, 79761  
[Public\\_Relations@echd.org](mailto:Public_Relations@echd.org)

*Re: Plastic Draping Policy (IR#0640)*

Dear Sir or Madam:

This firm represents the Informed Consent Action Network (“**ICAN**”). On behalf of ICAN, we are requesting records pursuant to the Public Information Act (“**PIA**”). Please provide the records in your possession via email to [foia@sirillp.com](mailto:foia@sirillp.com):

**Documents sufficient to show the Medical Center Health System and/or Medical Center Hospital’s policy to use plastic drapes or coverings to cover the heads and upper torsos of COVID-19 patients.**

We ask that you exercise your discretion and waive any and all fees or charges associated with this request. ICAN is a not-for-profit 501(c)(3) organization whose mission is to raise public awareness about vaccine safety and to provide the public with information to give informed consent. As part of its mission, ICAN actively investigates and disseminates information regarding vaccine safety issues, including through its website, and through press events and releases. ICAN is seeking the information in this PIA request to allow it to contribute to the public understanding of the government’s vaccine safety programs, including the government’s efforts to promote vaccine safety. The information ICAN is requesting will not contribute to any commercial activities.

If only portions of a requested file are exempted from release, the remainder must still be released. We therefore request that we be provided with all non-exempt portions which are reasonably segregable. We further request that you describe any deleted or withheld material in detail and specify the statutory basis for denying access to such documents as well as your reasons for believing that the alleged statutory justification applies. Such statements may help to avoid unnecessary litigation.

Access to the requested records should be granted within ten (10) business days. Failure to respond in a timely manner shall be viewed as a denial of this request and ICAN may commence a civil action.

If you would like to discuss our requests or any issues raised in this letter, please feel free to contact me at (212) 532-1091 or via email at [foia@sirillp.com](mailto:foia@sirillp.com) during normal business hours. Thank you for your time and attention to this matter.

Very truly yours,

/s/ Gabrielle G. Palmer  
Gabrielle Palmer, Esq.