



January 29, 2025

By Email

Shannon Hill
Chief Freedom of Information officer
Freedom of Information Act Office
University of Michigan
3300 Ruthven Building
1109 Geddes Ave.
Ann Arbor, MI 48109-1079
foia-email@umich.edu

Re: Freedom of Information Act Request – Center for Social Media Responsibility

Dear Ms. Hill,

Pursuant to Michigan’s Freedom of Information Act, M.C.L. § 15.231 *et seq.*, I write to request copies of the following records relating to the University of Michigan’s Center for Social Media Responsibility. As used in these requests, “record” has the broadest definition under the Freedom of Information Act and means any “writing prepared, owned, used, in the possession of, or retained by a public body in the performance of an official function, from the time it is created.” M.C.L. § 15.232(i). “Communication” means any public record that reflects interaction between two or more people, including memos, emails, text messages, iMessages, WhatsApp messages, and any other means of correspondence.

All requests are limited to the timeframe from January 1, 2020 to the present. Unless otherwise noted, all requests are limited to the custodians Paul Resnick, Libby Hemphill, James Park, Ceren Budak, David Jurgens, Thomas Finholt, Keith Coleman, Yasmin Green, Jud Hoffman, and Rob Malda.

1. All records containing the terms “National Science Foundation” or “NSF” or any other known abbreviations or names to refer to the National Science Foundation.
2. All communications between any of the above-listed custodians and federal government officials or employees with a “.gov” or “.mil” email address.
3. All records that reference the Knight Foundation.

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4. All communications between any of the above-listed custodians and officers or employees of the Knight Foundation with a “knightfoundation.org” email address or other email address known to belong to the Knight Foundation.
5. All communications between any of the above-listed custodians and officers or employees of Meta, Facebook, Instagram, Alphabet, Google, YouTube, Snap, Twitter, X Corp., or Reddit.
6. All records referencing the Community Notes Monitor, HOT Speech Metric, Iffy Quotient, AppealMod, or WiseDex for the custodians Paul Resnick, James Park, Keith Coleman, Yasmin Green, Jud Hoffman, and Rob Malda.
7. All .ppt files or other presentation files referencing the Community Notes Monitor, HOT Speech Metric, Iffy Quotient, AppealMod, or WiseDex.
8. All records returned by a search of the terms “censor!”, “free speech”, “First Amendment”, and “throttle!”.

If you object to any request based on the grounds allowed in the Freedom of Information Act, please email me so that I may clarify my request. I respectfully request the University waive all fees associated with this request because all records can be provided electronically. Alternatively, I agree to pay any reasonable fees not exceeding \$1,000 that are permitted by law for the processing of this request. If you anticipate the fees will exceed \$1,000 please notify me by email before processing this request.

Please produce all records in their native electronic format with all associated metadata. Please send the response to this request via email to mhoffmann@ADFlegal.org.

Thank you for your attention in this matter. Should you have any questions or concerns, please do not hesitate to contact me via email.

Sincerely,


Mathew W. Hoffmann
ALLIANCE DEFENDING FREEDOM