

VIRGINIA:

IN THE GENERAL DISTRICT COURT OF HENRICO COUNTY

WALTER SMITH,

Petitioner,

v.

**THE RECTOR AND VISITORS OF THE
UNIVERSITY OF VIRGINIA,**

Respondent.

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Case No. CV26007654-00

DECLARATION OF FAITH HILL

Faith Hill says the following under penalty of perjury:

1. I state the following upon my personal knowledge or information, and if called to testify in this matter, would state as follows:

2. I am the FOIA Officer and E-Discovery Manager for the University of Virginia. I have held this position since 2024 and previously served as the University's FOIA Officer from 2014 to 2018. Through my jobs at the University, I have become familiar with the requirements and procedures under the Virginia Freedom of Information Act. My duties as FOIA Officer include receiving and responding to FOIA requests submitted to the University, including those submitted through our online FOIA platform. In this capacity, I was in charge of the University's response to the requests submitted by Walter Smith which are now before the Court. My duties also include managing the issuance of document preservation notices and litigation holds.

3. In May 2024, the University was aware of faculty dissatisfaction with leadership in the UVA Health System and the University of Virginia School of Medicine. At the request of the Board of Visitors, on May 23, 2024, the Attorney General of Virginia appointed the law firm

of Williams & Connolly LLP (“Williams & Connolly”) “as special counsel to the Board of Visitors and the Audit, Compliance, and Risk Committee of the Board of Visitors of the University of Virginia. (collectively, the ‘BOV’) in connection with issues regarding the UVA Health System.” (A copy of this appointment letter is attached as Exhibit A).

4. On September 5, 2024, a group of UVA physician faculty members sent a letter of no confidence in UVA Health and School Medicine leadership, specifically Dr. Craig Kent (CEO of UVA Health System) and Dr. Melina Kibbe (Dean of the School of Medicine) to the Rector and the Board of Visitors. The letter made allegations relating to patient safety, treatment of faculty, and financial and reporting matters.

5. On September 8, 2024, the Board, using the appointment made by the Attorney General, asked Williams & Connolly to undertake an independent, internal and privileged investigation of the allegations in the letter.

6. To aid this investigation, in September and October 2024, in my capacity as E-Discovery manager, I issued a series of preservation notices to ensure the University preserved and maintained all documents relevant to the subject matters of the letter.

7. In February 2025, the Board announced that it would hold a special meeting on February 25, the focus of which would be a closed session to consult with Williams & Connolly.

8. On February 24, 2025, the Board and Williams & Connolly jointly received a communication from Jones Swanson Huddell, LLC. The communication was styled a “University Of Virginia Doctors’ Report For The Board Of Visitors Board Meeting To Be Held On February 25, 2025” and contained the views of a law firm hired to represent University of Virginia School of Medicine Faculty members in connection with the subject matter of the Williams & Connolly investigation.