

# Exhibit F

THE ALVAREZ FIRM  
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David A. Shaneyfelt  
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February 6, 2024

By email: [REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]

Re: Demand for Mediation

Dear [REDACTED]

Our clients—Dr. James Studnicki, Dr. Donna J. Harrison, Tessa Longbons, Dr. Ingrid Skop, Dr. David C. Reardon, Dr. John W. Fisher, Dr. Maka Tsulukidze, Christopher Craver, Dr. Christina Cirucci, Dr. Sharon J. MacKinnon, and the Charlotte Lozier Institute (“Authors”)—hereby demand that Sage Publications, Inc. (“Sage”) and [REDACTED] Editor-in-Chief of Sage’s *Health Services Research and Managerial Epidemiology* (“Journal”) (together, “Respondents”) engage in non-binding mediation regarding Respondents’ February 5, 2024 retraction of three articles—namely, Studnicki, et al. 2021,<sup>1</sup> Studnicki, et al. 2019,<sup>2</sup> and Studnicki, et al. 2022.<sup>3</sup> The mediation will also address all public statements that Respondents have made about the Authors or their work, including in their Retraction Notice, their Expression of Concern and elsewhere. *See, e.g.*, “A note from Sage on retractions in *Health Services Research and Managerial Epidemiology*,” perspectivesblog.sagepub.com (Feb. 5, 2024). It will address the removal of Dr. Studnicki from the Journal’s Editorial Board. And it will involve the Authors’ claims for all appropriate relief arising from Respondents’ improper conduct, including all appropriate monetary damages and equitable relief.

Mediation is demanded under the terms of the Publishing Agreements (“Agreements”) whereby the Authors granted Sage a license to publish the retracted articles. However, we believe the Authors and Respondents have exhausted all reasonable efforts to settle this dispute.

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<sup>1</sup> Studnicki J., et al. A Longitudinal Cohort Study of Emergency Room Utilization Following Mifepristone Chemical and Surgical Abortions, 1999-2015. *HEALTH SERVICES RESEARCH AND MANAGERIAL EPIDEMIOLOGY*. 2021;8. doi:10.1177/23333928211053965

<sup>2</sup> Studnicki J., et al. Doctors Who Perform Abortions: Their Characteristics and Patterns of Holding and Using Hospital Privileges. *HEALTH SERVICES RESEARCH AND MANAGERIAL EPIDEMIOLOGY*. 2019;6. doi:10.1177/2333392819841211

<sup>3</sup> Studnicki J., A Post Hoc Exploratory Analysis: Induced Abortion Complications Mistaken for Miscarriage in the Emergency Room are a Risk Factor for Hospitalization. *HEALTH SERVICES RESEARCH AND MANAGERIAL EPIDEMIOLOGY*. 2022;9. doi:10.1177/23333928221103107

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The Authors are therefore prepared to waive mediation and proceed directly to arbitration. Please let us know whether Respondents likewise are prepared to waive mediation and proceed directly to arbitration.

Finally, I reiterate what I said in my November 29, 2023 letter to you: Sage is under an ongoing obligation to preserve all documents related to this dispute, and that of course extends to [REDACTED] and all other relevant custodians, and to all devices and platforms (including text messages and emails) containing relevant information.

We would appreciate hearing from you as soon as possible, and no later than Thursday, February 8, 2024. In making this demand, my clients reserve all rights and waive none.

Very truly yours,

THE ALVAREZ FIRM



David A. Shaneyfelt

cc: Dr. James Studnicki  
[jstudnicki@lozierinstitute.org](mailto:jstudnicki@lozierinstitute.org)