UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

AMERICAN ASSOCIATION OF UNIVERSITY PROFESSORS,

and

AMERICAN FEDERATION OF TEACHERS,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF JUSTICE, et al.,

Defendants.

Case No. 1:25-cv-02429-MKV

Supplemental Declaration of Julie Schmid

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

AMERICAN ASSOCIATION OF UNIVERSITY PROFESSORS,

and

AMERICAN FEDERATION OF TEACHERS,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF JUSTICE. et al.,

Defendants.

Case No. 1:25-cv-02429-MKV

SUPPLEMENTAL DECLARATION OF JULIE SCHMID

I, Julie Schmid, hereby declare as follows:

- 1. I am over the age of 18 and have personal knowledge of the facts in this declaration. I serve as the Director of Higher Education at the American Federation of Teachers ("AFT"), one of the plaintiffs in this lawsuit. I previously submitted a declaration in this action describing my background. *See* Declaration of Julie Schmid (Apr. 1, 2025) (ECF 28).
- 1. I have personal knowledge of the facts set forth in this supplemental declaration in support of Plaintiff's Motion for Preliminary Injunction, and if called as a witness in this action, I could and would testify competently to these facts.
- 2. In my previous declaration, I described harms that the AFT's members and the AFT itself have suffered and will suffer from Defendants' actions without a preliminary injunction. *See* Declaration of Julie Schmid (Apr. 1, 2025) (ECF 28) ¶¶12, 19-25. This supplemental declaration describes additional harms that Defendants' actions have caused to the AFT since I signed my prior declaration.

- 3. Since I signed my previous declaration on April 1, 2025, Defendants' funding cuts to Columbia, threats to make additional cuts if Columbia does not accede to their demands, and freezing of additional federal funding to Columbia, including freezing all NIH grants, have directly frustrated the AFT's core activities of providing counseling, advice, and representation services to AFT chapters and members to advance the AFT's mission to protect academic freedom, due process, and economic security of higher education professionals. Defendants' actions have caused the AFT to divert additional time, money, and staff resources from other efforts to respond to Defendants' actions. For example, since April 1, 2025, the AFT has spent time and resources offering webinars and workshops addressing academic freedom and free speech concerns that chapters and members have raised as a direct result of the actions taken by the Defendants against Columbia. To support this effort, AFT's Higher Education Program and Policy Council established a subcommittee tasked with creating resources on academic freedom and free speech, with support from AFT staff. On April 3, 2025, as part of the AFT's counseling and representation services to its chapters and members, the Shanker Institute partnered with the AFT Higher Education Division to host an event titled, "Antisemitism, Democracy, and the Assault on Knowledge & Education," where panelists discussed how the Defendants exploited real concerns about antisemitism to attack higher education institutions like Columbia and offered advice to members on how to protect their rights. In her April 20, 2025 New York Times column, AFT president Randi Weingarten discussed how the Defendants' actions have undermined the pursuit of knowledge and the right to free speech, directly impairing the AFT's core activities. On April 23, 2025, the AFT released a podcast titled, Higher Education Under Attack, available at www.aft.org/uniontalk, focusing on the Defendants' attacks on higher education institutions and how members can defend their academic freedom and free speech rights.
- 4. The AFT diverted time, money, and staff resources to engage in these efforts and the efforts described in my previous declaration to respond to Defendants' actions that directly harmed the AFT's ability to provide its core services to its chapters and members. Had Defendants not cut funding to Columbia and threatened to cut more funding unless Columbia complied with

Defendants' demands, the AFT would have used that staff time, money, and resources to engage in different tasks intended to promote other aspects of the AFT's mission. For example, the AFT's previously ongoing and planned efforts aimed at increasing public funding for higher education and securing job security to contingent faculty have been redirected towards defending academic freedom through servicing and counseling to AFT chapters and members. Last summer, as part of its Real Solutions in Higher Education campaign, the AFT pledged \$1 million to support state and local affiliates in addressing job insecurity on campuses for contingent faculty, reducing public disinvestment in our colleges and universities, and fighting threats to academic freedom. Since its launch, the AFT has rejected more than \$900,000 in grant requests from affiliates related to job insecurity for contingent faculty and reducing public investment in colleges and universities, as a result of the AFT's need to focus its resources on the defense of academic freedom at Columbia and other campuses.

I declare under penalty of perjury under the laws of the United States of America that the

foregoing is true and correct.

Executed on this ______ day of May 2025.