

**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

**DECLARATION OF MATTHEW
MURRAY IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY INJUNCTION**

I, Matthew Murray, hereby declare as follows:

1. I am an attorney at the law firm Altshuler Berzon LLP in San Francisco, CA, and am a member of the State Bar of California. I am co-counsel for Plaintiffs in this matter, and have been admitted to practice *pro hac vice* in this case. I make this statement based on personal knowledge, and if called as a witness could and would testify competently thereto.

2. This declaration is submitted in support of Plaintiffs' Motion for a Preliminary Injunction.

3. Attached hereto as **Exhibit A** is a true and correct copy of the following U.S. Department of Health and Human Services press release posted yesterday, May 22, 2025: *HHS' Civil Rights Office Finds Columbia University in Violation of Federal Civil Rights Law* (May 22, 2025), downloaded from <https://www.hhs.gov/press-room/ocr-columbia-violates-federal-civil-rights-law.html>.

I declare under penalty of perjury that the foregoing is true and correct.


Dated: May 23, 2025

Signed: /s/Matthew Murray

Matthew Murray

Counsel for Plaintiffs

Exhibit A

 An official website of the United States government

[Home](#)[Press Room](/press-room/index.html)

HHS' Civil Rights Office Finds Col...

Navigate to:



FOR IMMEDIATE RELEASE

May 22, 2025

Contact: HHS Press Office

202-690-6343

[Submit a Request for
Comment](#)

HHS' Civil Rights Office Finds Columbia University in Violation of Federal Civil Rights Law

*Extensive Investigative Findings Conclude that Columbia University Violated Title VI by
Showing Deliberate Indifference to the Hostile Environment Faced by its Jewish
Students*

Today, the U.S. Department of Health and Human Services (HHS) Office for Civil Rights (OCR) announced that Columbia University violated Title VI of the Civil Rights Act of 1964 (Title VI) by acting with deliberate indifference towards student-on-student harassment of Jewish students from October 7, 2023, through the present.

OCR enforces Title VI, which prohibits a recipient of Federal financial assistance from discriminating in its programs and activities on the basis of race, color, or national origin, which includes discrimination against individuals that is based on their actual or perceived Israeli or Jewish identity or ancestry. OCR's Notice of Violation articulates extensive factual findings that span a period of over 19 months in which the University continually failed to protect Jewish students. The findings are based on information and documents obtained during the investigation, including witness interviews; examination of written policies and procedures; reliable media reports that contemporaneously capture antisemitic incidents and events at Columbia University; and reports from Columbia University's own Task Force on Antisemitism.

"The findings carefully document the hostile environment Jewish students at Columbia University have had to endure for over 19 months, disrupting their education, safety, and well-being," said Anthony Archeval, Acting Director of the Office for Civil Rights at HHS. "We encourage Columbia University to work with us to come to an agreement that reflects meaningful changes that will truly protect Jewish students."

The Notice of Violation comprehensively explains the ways in which Columbia University acted with deliberate indifference with regard to the hostile environment created by some of its students. For example, the University failed:

- To establish effective reporting and remediation mechanisms for antisemitism until the summer of 2024,
- To properly abide by its own policies and procedures when responding to Jewish students' complaints,
- To abide by its only policies and procedures governing student misconduct against Jewish students,
- To investigate or punish vandalism in its classrooms, which include the repeated drawing of swastikas and other universally recognized hate images, and

- To enforce its time, place, and manner restrictions for protests held on campus, such as inside and around its academic buildings, residence halls, and libraries since October 7, 2023.

OCR's Notice of Violation to Columbia is jointly issued and signed by the U.S. Department of Education's Office for Civil Rights. This action demonstrates the Administration's commitment to address "anti-Semitism vigorously, using all available and appropriate legal tools[] . . . [to address] unlawful anti-Semitic harassment and violence," as expressed in President Trump's Executive Orders, **Combatting Anti-Semitism** <<https://www.federalregister.gov/documents/2019/12/16/2019-27217/combating-anti-semitism>> (Dec. 11, 2019) and **Additional Measures to Combat Anti-Semitism** <<https://www.whitehouse.gov/presidential-actions/2025/01/additional-measures-to-combat-anti-semitism/>> (Jan. 29, 2025).

Today's announcement is part of a broader effort by the Administration's multi-agency Joint Task Force to Combat Anti-Semitism <<https://www.justice.gov/opa/pr/justice-department-announces-formation-task-force-combat-anti-semitism>>.

If you believe that you or someone else has been discriminated against because of race, color, national origin, disability, age, sex, or religion in programs or activities that HHS directly operates or to which HHS provides Federal financial assistance, you may file a complaint with the HHS Office for Civil Rights at: <https://www.hhs.gov/civil-rights/filing-a-complaint/index.html> </civil-rights/filing-a-complaint/index.html>

Follow HHS OCR on X (formerly Twitter) at @HHSOCR <<https://x.com/hhsocr>>.

###

Note: All HHS press releases, fact sheets and other news materials are available in our Press Room </press-room/index.html>.

Like HHS on Facebook, follow HHS on X @HHSgov <<https://x.com/hhsgov>>, @SecKennedy <<https://x.com/seckennedy>>, and sign up for HHS Email Updates <<https://cloud.connect.hhs.gov/subscriptionscenter>>.

Last revised: May 22, 2025



Submit a request for comment

For media inquiries, please submit a request for comment.

Sign up to receive our press releases

Sign Up

Related Press Releases

HHS' Civil Rights Office Clarifies Race-Based Prohibitions for Medical Schools to Advance Values of Initiative, Hard Work, and Excellence

</press-room/guidance-med-schools-dear-colleague-letter.html>

MAY 6, 2025 | PRESS RELEASE

Task Force to Combat Anti-Semitism Statement Regarding Yale's Actions

</press-room/anti-semitism-task-force-statement-on-yale.html>

APRIL 24, 2025 | PRESS RELEASE

HHS Office for Civil Rights Works with Alabama to Help Young Adult with Autism Move from a State Institution to a Home in the Community

</press-room/ocr-olmstead-resolution-alabama-department-mental-health.html>

APRIL 4, 2025 | PRESS RELEASE

Content created by Office for Civil Rights (OCR)

Content last reviewed May 22, 2025