

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 Andrew Geneslaw (Witness K)

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SOUTHERN DISTRICT OF NEW YORK

AMERICAN ASSOCIATION OF UNIVERSITY  
PROFESSORS,

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UNITED STATES DEPARTMENT OF JUSTICE. *et*  
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Defendants.

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**SUPPLEMENTAL DECLARATION OF ANDREW GENESLAW**

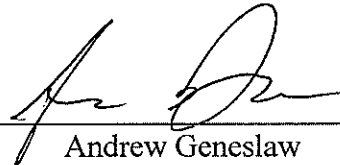
I, Andrew Geneslaw, hereby declare as follows:

1. I am an Assistant Professor of Pediatrics at the Columbia University Irving Medical Center (CUIMC), where I also serve as the Program Director for the Pediatric Critical Care Medicine Fellowship. I previously submitted a sealed declaration in this action describing my background. *See* Declaration of Witness K (May 8, 2025).
2. I have personal knowledge of the facts set forth in this declaration, and if called as a witness in this action, I could and would testify competently to these facts.
3. I initially sought to submit my declaration in this action under seal because I am frightened of the personal and professional risk that I may incur by speaking out about the harms caused by the government's actions, including the chilling of speech. But I believe that it is my duty as a citizen and physician to speak about these issues, and the fact that I am frightened highlights all the more clearly why it is necessary to speak. Although I continue to be afraid of the risks, I am willing to make my declaration public in light of the Court's decision on sealing,

as I understand the only alternative is to withdraw the submission. Others in my field may legitimately feel the risk is too great for them depending on their appearances, religious/cultural backgrounds, or family situations, and I hope that my own speech can be of service to them.

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 22 day of May 2025.

  
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Andrew Geneslaw