

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

AMERICAN ASSOCIATION OF
UNIVERSITY PROFESSORS–HARVARD
FACULTY CHAPTER et al.,

Case No. 1:25-CV-10910-ADB

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
JUSTICE et al.,

Defendants.

**DECLARATION OF DANIEL H. SILVERMAN IN SUPPORT OF PLAINTIFFS’
MOTION FOR SUMMARY JUDGMENT**

I, Daniel H. Silverman, declare as follows:

1. I am a Partner at the law firm Cohen Milstein Sellers & Toll PLLC and am duly licensed to practice in the State of Massachusetts (BBO# 704387).

2. I am counsel for Plaintiffs American Association of University Professors (“AAUP”), American Association of University Professors–Harvard Faculty Chapter (“AAUP–Harvard”), and International Union, United Automobile, Aerospace and Agricultural Implement Workers of America (“UAW”) in the above-captioned litigation

3. I submit this declaration in support of Plaintiffs’ Motion for Summary Judgment, filed herewith.

4. Attached hereto as **Exhibit 1** is a true and correct copy of a press release issued by the Department of Justice’s Office of Public Affairs entitled “Justice Department Announces Formation of Task Force to Combat Anti-Semitism” and dated February 3, 2025.

5. Attached hereto as **Exhibit 2** is a true and correct copy of a press release issued by the General Services Administration entitled “HHS, ED, and GSA announce additional measures to end anti-Semitic harassment on college campuses” and dated March 3, 2025.

6. Attached hereto as **Exhibit 3** is a true and correct copy of a post on Truth Social by Donald J. Trump dated March 4, 2025.

7. Attached hereto as **Exhibit 4** is a true and correct copy of a press release by the General Services Administration entitled “DOJ, HHS, ED, and GSA announce initial cancellation of grants and contracts to Columbia University worth \$400 million” and dated March 7, 2025.

8. Attached hereto as **Exhibit 5** is a true and correct copy of a video recording entitled “Leo Terrell with Mark Levin- How we’ll defeat antisemitism in the USA” as downloaded from YouTube’s website at <https://www.youtube.com/watch?v=NOFIKRr2Sco>.

9. Attached hereto as **Exhibit 6** is a true and correct copy of a press release by the U.S. Department of Education entitled “U.S. Department of Education’s Office for Civil Rights Sends Letters to 60 Universities Under Investigation for Antisemitic Discrimination and Harassment” and dated March 10, 2025.

10. Attached hereto as **Exhibit 7** is a true and correct copy of an audio recording of the March 19, 2025, interview of Leo Terrell on the Hugh Hewitt Show as downloaded from <https://eadn-wc05-2440449.nxedge.io/wp-content/uploads/2025/03/03-19hhs-terrell.mp3>.

11. Attached hereto as **Exhibit 8** is a true and correct copy of a post on Truth Social by Donald J. Trump dated April 15, 2025.

12. Attached hereto as **Exhibit 9** is a true and correct copy of a post on Truth Social by Donald J. Trump dated April 16, 2025.

13. Attached hereto as **Exhibit 10** is a true and correct copy of a post on Truth Social by Donald J. Trump dated April 24, 2025.

14. Attached hereto as **Exhibit 11** is a true and correct copy of a post on Truth Social by Donald J. Trump dated May 2, 2025.

15. Attached hereto as **Exhibit 12** is a true and correct copy of a video recording entitled “Education Secretary Linda McMahon to Harvard: Obey the law and you can be eligible for funding” as downloaded from YouTube’s website at <https://www.youtube.com/watch?v=bb6YJUHMQc4>.

16. Attached hereto as **Exhibit 13** is a true and correct copy of a video recording entitled “Watch CNBC's full interview with Education Secretary Linda McMahon” as downloaded from YouTube’s website at <https://www.youtube.com/watch?v=h3KHwRH1DYQ>.

17. Attached hereto as **Exhibit 14** is a true and correct copy of the declaration of Kirsten Weld executed on June 2, 2025.

18. Attached hereto as **Exhibit 15** is a true and correct copy of the declaration of Todd Wolfson executed on May 30, 2025.

19. Attached hereto as **Exhibit 16** is a true and correct copy of the declaration of John Quackenbush executed on June 2, 2025.

20. Attached hereto as **Exhibit 17** is a true and correct copy of the declaration of Caroline Light executed on June 1, 2025.

21. Attached hereto as **Exhibit 18** is a true and correct copy of the declaration of Molly Forrest Franke executed on May 30, 2025.

22. Attached hereto as **Exhibit 19** is a true and correct copy of the declaration of Meredith Rosenthal executed on June 2, 2025.

23. Attached hereto as **Exhibit 20** is a true and correct copy of the declaration of Paige Williams executed on June 2, 2025.

24. Attached hereto as **Exhibit 21** is a true and correct copy of the declaration of Shoba Ramanadhan executed on June 2, 2025.

25. Attached hereto as **Exhibit 22** is a true and correct copy of the declaration of Scott Delaney executed on June 1, 2025.

26. Attached hereto as **Exhibit 23** is a true and correct copy of the declaration of Walter Willett executed on May 30, 2025.

27. Attached hereto as **Exhibit 24** is a true and correct copy of the declaration of Sarah Fortune executed on May 30, 2025.

28. Attached hereto as **Exhibit 25** is a true and correct copy of the declaration of Donald Ingber executed on May 30, 2025.

29. Attached hereto as **Exhibit 26** is a true and correct copy of the declaration of Bence Ölveczky executed on May 29, 2025.

30. Attached hereto as **Exhibit 27** is a true and correct copy of the declaration of Victoria Jenkins executed on May 30, 2025.

31. Attached hereto as **Exhibit 28** is a true and correct copy of the declaration of Jennifer Chen executed on May 29, 2025.

32. Attached hereto as **Exhibit 29** is a true and correct copy of the declaration of Beau Schaeffer executed on May 30, 2025.

33. Attached hereto as **Exhibit 30** is a true and correct copy of the declaration of Adam Sychla executed on May 30, 2025.

34. Attached hereto as **Exhibit 31** is a true and correct copy of the declaration of Kelsey Tyssowski executed on May 30, 2025.

35. Attached hereto as **Exhibit 32** is a true and correct copy of the declaration of Trudy Merritt executed on May 30, 2025.

36. Attached hereto as **Exhibit 33** is a true and correct copy of the declaration of Jules Riegel executed on May 31, 2025.

37. Attached hereto as **Exhibit 34** is a true and correct copy of the declaration of Neal Sweeney executed on June 1, 2025.

38. Attached hereto as **Exhibit 35** is filed under seal pursuant to the Court's order granting Plaintiffs' Motion to Seal, Dkt. 72.

39. Attached hereto as **Exhibit 36** is filed under seal pursuant to the Court's order granting Plaintiffs' Motion to Seal, Dkt. 72.

I declare under the penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed on this 2nd day of June, 2025, in Boston, Massachusetts.

Signed: /s/ Daniel H. Silverman
Daniel H. Silverman (BBO # 704387)
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