UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

AMERICAN ASSOCIATION OF UNIVERSITY PROFESSORS,

AMERICAN ASSOCIATION OF UNIVERSITY PROFESSORS-HARVARD FACULTY CHAPTER,

AMERICAN ASSOCIATION OF UNIVERSITY PROFESSORS AT NEW YORK UNIVERSITY,

RUTGERS AMERICAN ASSOCIATION OF UNIVERSITY PROFESSORS-AMERICAN FEDERATION OF TEACHERS, and

MIDDLE EAST STUDIES ASSOCIATION,

Plaintiffs,

v.

MARCO RUBIO, in his official capacity as Secretary of State, and the DEPARTMENT OF STATE,

KRISTI NOEM, in her official capacity as Secretary of Homeland Security, and the DEPARTMENT OF HOMELAND SECURITY,

TODD LYONS, in his official capacity as Acting Director of U.S. Immigration and Customs Enforcement,

DONALD J. TRUMP, in his official capacity as President of the United States, and

UNITED STATES OF AMERICA,

Defendants.

Civil Action No. 1:25-cv-10685-WGY

DECLARATION OF RAMYA KRISHNAN

I, Ramya Krishnan, declare as follows:

1. I am a licensed attorney in good standing in the state of New York. I appear on behalf of Plaintiffs in the above-captioned case and have been admitted *pro hac vice* to this court.

2. I submit this declaration in support of Plaintiffs' motion for a preliminary injunction, pursuant to Federal Rule of Civil Procedure 65.

3. Attached hereto as **Exhibit A** is a true and correct copy of the *Washington Post* article by Josh Dawsey, Karen DeYoung, and Marianne LeVine titled, "Trump Told Donors He Will Crush Pro-Palestinian Protests, Deport Demonstrators," published on May 27, 2024. The article is also available at https://perma.cc/JQ92-ZF3W.

4. Attached hereto as **Exhibit B** is a true and correct copy of Executive Order 14,161, titled, "Protecting the United States from Foreign Terrorists and Other National Security and Public Safety Threats," published on January 20, 2025. The executive order is also available at https://perma.cc/W2Z3-RBV2.

5. Attached hereto as **Exhibit C** is a true and correct copy of Executive Order 14,188, titled, "Additional Measures to Combat Anti-Semitism," published on January 29, 2025. The executive order is also available at https://perma.cc/NL58-MWNB.

6. Attached hereto as **Exhibit D** is a true and correct copy of the fact sheet titled, "Fact Sheet: President Donald J. Trump Takes Forceful and Unprecedented Steps to Combat Anti-Semitism," published on December January 30, 2025. The fact sheet is also available at https://perma.cc/GR8D-BPDV.

7. Attached hereto as **Exhibit E** is a true and correct copy of a post published on X by Secretary of State Marco Rubio on March 6, 2025. The post is also available at https://perma.cc/KD9R-BNV3.

8. Attached hereto as **Exhibit F** is a true and correct copy of the *Axios* article by Marc Caputo titled, "Scoop: State Dept. to Use AI to Revoke Visas of Foreign Students Who Appear 'Pro-Hamas,'" published on March 6, 2025. The article is also available at https://perma.cc/M886-KCTK.

9. Attached hereto as **Exhibit G** is a true and correct copy of the "Notice to Appear" issued to Mahmoud Khalil on March 9, 2025, as well as the "Additional Charges of Inadmissibility / Deportability" issued to Mahmoud Khalil on March 17, 2025, both included in support of the government's motion to transfer his case, filed in the District of New Jersey on March 20, 2025. This version of the Notice to Appear was redacted by the government.

10. Attached hereto as **Exhibit H** is a true and correct copy of a post published on X by the Department of Homeland Security on March 9, 2025. The post is also available at https://perma.cc/3NNQ-235L.

11. Attached hereto as **Exhibit I** is a true and correct copy of a post published on X by Secretary of State Marco Rubio on March 9, 2025. The post is also available at https://perma.cc/Q7EH-M4LW.

12. Attached hereto as **Exhibit J** is a true and correct copy of a post published on Truth Social by President Donald Trump on March 10, 2025. The post is also available at https://perma.cc/Z5PU-7MZT.

13. Attached hereto as **Exhibit K** is a true and correct copy of the *Free Press* article by Gabe Kaminsky, Madeleine Rowley, and Maya Sulkin titled, "The ICE Detention of a Columbia Student Is Just the Beginning," published on March 10, 2025. The article is also available at https://perma.cc/V2FJ-AUDQ.

14. Attached hereto as **Exhibit L** is a true and correct copy of a transcript of a news briefing given by White House Press Secretary Karoline Leavitt on March 11, 2025, published by *Roll Call*. The transcript is also available at https://perma.cc/XAJ6-N2CD.

15. Attached hereto as **Exhibit M** is a true and correct copy of the amended habeas petition filed by Mahmoud Khalil in the Southern District of New York on March 13, 2025.

16. Attached hereto as **Exhibit N** is a true and correct copy of a transcript of an interview with Troy Edgar, the Deputy Secretary of the Department of Homeland Security, on NPR's *Morning Edition* on March 13, 2025. The transcript is also available at https://perma.cc/Q45C-6B9A.

17. Attached hereto as **Exhibit O** is a true and correct copy of a transcript of an interview with Vice President JD Vance on *Fox News* on March 13, 2025. This transcript was generated on rev.com from a video clip of the interview. I have verified that it is accurate.

18. Attached hereto as **Exhibit P** is a true and correct copy of a press release from the Department of Homeland Security titled, "VIDEO: Columbia University Student Whose Visa Was Revoked for Supporting Hamas and Terrorist Activities Used CBP Home App to Self-Deport," dated March 14, 2025. The press release is also available at https://perma.cc/7YAG-38XF.

19. Attached hereto as **Exhibit Q** is a true and correct copy of the *New York Times* article by Luis Ferré-Sadurní and Hamed Aleaziz titled, "How a Columbia Student Fled to Canada After ICE Came Looking for Her," published on March 15, 2025. The article is also available at https://perma.cc/B3WT-8GHJ.

20. Attached hereto as **Exhibit R** is a true and correct copy of a transcript of an interview with Secretary of State Marco Rubio on CBS's *Face the Nation* on March 16, 2025. The transcript is also available at https://perma.cc/DV8P-2CWZ.

21. Attached hereto as **Exhibit S** is a true and correct copy of the *New York Times* article by Hank Sanders and Zolan Kanno-Youngs titled, "D.H.S. Detains a Georgetown University Academic," published on March 19, 2025. The article is also available at https://perma.cc/AM9N-X8W4.

22. Attached hereto as **Exhibit T** is a true and correct copy of the *Washington Post* article by Dan Rosenzweig-Ziff and Teo Armus titled, "Judge Orders that Georgetown Researcher Detained by ICE Remain in the U.S.," published on March 20, 2025. The article is also available at https://perma.cc/XR4L-7RU3.

23. Attached hereto as **Exhibit U** is a true and correct copy of a letter to U.S. District Court Judge Elizabeth Coombe filed in the Northern District of New York by counsel for Momodou Taal on March 21, 2025.

24. Attached hereto as **Exhibit V** is a true and correct copy of the *New York Times* article by Jonah E. Bromwich and Hamed Aleaziz titled, "Columbia Student Hunted by ICE Sues to Prevent Deportation," published on March 24, 2025. The article is also available at https://perma.cc/6KHU-M24X.

25. Attached hereto as **Exhibit W** is a true and correct copy of the *New York Times* article by Santul Nerkar and Jonah E. Bromwich titled, "Judge Orders U.S. to Stop Attempts to Deport Columbia Undergraduate," published on March 25, 2025. The article is also available at https://perma.cc/V85P-43V7.

26. Attached hereto as **Exhibit X** is a true and correct copy of the *Washington Post* article by Laura Meckler titled, "New Trump Demand to Colleges: Name Protesters — and Their Nationalities," published on March 25, 2025. The article is also available at https://perma.cc/D88A-LF5M.

27. Attached hereto as **Exhibit Y** is a true and correct copy of the *Associated Press* article by Jake Offenhartz, Kathy McCormack, and Michael Casey titled, "Turkish Student at Tufts University Detained, Video Shows Masked People Handcuffing Her," published on March 26, 2025. The article is also available at https://perma.cc/7BQZ-GV63.

28. Attached hereto as **Exhibit Z** is a true and correct copy of the *CNN* article by Andy Rose titled, "Visa of Cornell University Student Fighting Deportation is Revoked by the State Department," published on March 26, 2025. The article is also available at https://perma.cc/7UC8-T35E.

29. Attached hereto as **Exhibit AA** is a true and correct copy of the *Axios* article by Marc Caputo titled, "Exclusive: Trump's 'Pro-Hamas' Purge Could Block Foreign Students From Colleges," published on March 27, 2025. The article is also available at https://perma.cc/BU69-3EFS.

30. Attached hereto as **Exhibit BB** is a true and correct copy of the *CBS News* article by Caroline Linton titled, "Marco Rubio Says 300 Student Visas Have Been Revoked, Including Detentions at Tufts, Columbia and More," published on March 27, 2025. The article is also available at https://perma.cc/7VEL-AYFV.

31. Attached hereto as **Exhibit CC** is a true and correct copy of a transcript of a joint press conference given by Secretary of State Marco Rubio and Guyanese President Irfaan Ali on March 27, 2025. The transcript is also available at https://perma.cc/8LC9-S86R.

32. Attached hereto as **Exhibit DD** is a true and correct copy of an article by Ken Klippenstein titled, "Trump Admin Spies on Social Media of Student Visa Holders," published on Substack on March 28, 2025. The article is also available at https://perma.cc/FV5L-MUNA.

33. Attached hereto as **Exhibit EE** is a true and correct copy of the *Guardian* article by Joseph Gedeon titled, "US Issues Broad Order to Consulates to Vet Student Visas Over 'Terrorist Activity,'" published on March 28, 2025. The article is also available at https://perma.cc/2WBP-VPU8.

34. Attached hereto as **Exhibit FF** is a true and correct copy of the *Forbes* article by Stuart Anderson titled, "Trump Immigration Policies Increase Peril For International Students," published on March 31, 2025. The article is also available at https://perma.cc/B2TD-F358.

35. Attached hereto as **Exhibit GG** is a true and correct copy of a redacted memorandum titled, "Constitutional Considerations Relating to Proposed Enhanced Vetting of Aliens in the United States for Counterterrorism Purposes," obtained from U.S. Immigration and Customs Enforcement by the Knight First Amendment Institute through a Freedom of Information Act request. The redacted memorandum is also available at https://perma.cc/BQ7E-UUPE.

36. Attached hereto as **Exhibit HH** is a true and correct copy of a redacted memorandum titled, "Inadmissibility Based on Endorsing or Espousing Terrorist Activity: First Amendment Concerns," obtained from U.S. Immigration and Customs Enforcement by the Knight First Amendment Institute through a Freedom of Information Act request. The redacted memorandum is also available at https://perma.cc/CD8Q-4CER.

37. Attached hereto as **Exhibit II** is a true and correct copy of the *BBC* article by Max Matza titled, "University Student Targeted by Trump Leaves the US," published on April 1, 2025. The article is also available at https://perma.cc/4383-CC9U.

38. In accordance with 28 U.S.C. § 1746, I declare under penalty of perjury that the forgoing is true and correct to the best of my knowledge.

Respectfully submitted,

/s/ Ramya Krishnan
Ramya Krishnan

Counsel for Plaintiffs

April 1, 2025