UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

AMERICAN ASSOCIATION OF UNIVERSITY PROFESSORS, ET AL., Plaintiffs, v. MARCO RUBIO, ET AL., Defendants.	Case 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 Remedies Against Defendants.

3. Attached hereto as **Exhibit A** is a true and correct copy of the *NBC News* article by David Ingram titled, "Unions Sue Trump Administration Over Social Media 'Surveillance' Program," published October 16, 2025. The article is also available at https://perma.cc/U4BN-96GF.

4. Attached hereto as **Exhibit B** is a true and correct copy of a post published on X by the Department of State on October 26, 2025. The post is also available at https://perma.cc/FES6-W3TW.

5. Attached hereto as **Exhibit C** is a true and correct copy of a post published on X by Tricia McLaughlin, Assistant Secretary for Public Affairs of the Department of Homeland Security, on October 26, 2025. The post is also available at https://perma.cc/8DJZ-5JWR.

6. Attached hereto as **Exhibit D** is a true and correct copy of a series of posts published on X by the Department of State on October 14, 2025. The posts are also available at https://perma.cc/S5QV-XGK5.

7. 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.

November 10, 2025

Respectfully submitted,

/s/ Ramya Krishnan
Ramya Krishnan

Counsel for Plaintiffs