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

SUPPLEMENTAL 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 a transcript of remarks given by Secretary of State Marco Rubio on March 28, 2025. The transcript is also available at https://perma.cc/5YPB-GBGX.

4. Attached hereto as **Exhibit B** is a true and correct copy of an interview with Secretary of State Marco Rubio on *Triggered with Don. Jr.* on April 8, 2025. The transcript is also available at https://perma.cc/6RD7-S8DN.

5. Attached hereto as **Exhibit C** is a true and correct copy of a press release from the Department of Homeland Security titled, "DHS to Begin Screening Aliens' Social Media Activity for Antisemitism," dated April 9, 2025. The press release is also available at https://perma.cc/ZSM5-X5GE.

6. Attached hereto as **Exhibit D** is a true and correct copy of the *NBC News* article by Julia Ainsley titled, "Inside the DHS Task Force Scouring Foreign Students' Social Media," published on April 9, 2025. The article is also available at https://perma.cc/L9NM-BR3C.

7. Attached hereto as **Exhibit E** is a true and correct copy of a memorandum for the Secretary of Homeland Security written by Secretary of State Marco Rubio with the subject line, "Notification of Removability Determinations Under Section 237(a)(4)(C) of the Immigration and Nationality Act (INA)," filed by the Department of Homeland Security Immigration and Customs

Enforcement on April 9, 2025 in the matter of Mahmoud Khalil in Immigration Court in Louisiana. The memorandum is also available at https://perma.cc/9URH-XB8J.

8. Attached hereto as **Exhibit F** is a true and correct copy of the *Washington Post* article by John Hudson titled, "No evidence linking Tufts student to antisemitism or terrorism, State Dept. office found," published on April 13, 2025. The article is also available at https://perma.cc/KRB2-AVXF.

9. Attached hereto as **Exhibit G** is a true and correct copy of a transcript of an interview with White House Deputy Chief of Staff Stephen Miller on Fox News on April 14, 2025. This transcript was generated on rev.com from a video clip of the interview. I have verified that it is accurate.

10. Attached hereto as **Exhibit H** is a true and correct copy of the *New York Times* article by Hamed Aleaziz and Jonah E. Bromwich titled, "*U.S. Cites Mideast Peace Process to Justify Move to Deport Student*," published on April 15, 2025. The article is also available at https://perma.cc/4BAV-TY2L.

11. 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.

April 18, 2025

Respectfully submitted,

/s/ Ramya Krishnan
Ramya Krishnan

Counsel for Plaintiffs