

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

STATE OF CALIFORNIA, *et al.*,

Plaintiffs,

v.

KRISTI NOEM, in her official capacity as
Secretary of Homeland Security, *et al.*,

Defendants.

No. 1:25-cv-13829-LTS

DECLARATION OF JAMES E. RICHARDSON

I, James E. Richardson, hereby state the following pursuant to 28 U.S.C. § 1746:

1. I hold the title of Deputy Attorney General in the Office of the Attorney General of the State of California, and I appear on behalf of Plaintiffs in this action.
2. I submit this declaration in support of Plaintiffs' Motion for Summary Judgment.
3. The facts set forth herein are based upon my personal knowledge or a review of the files in my possession.
4. I have attached to this declaration true and correct copies of factual declarations.

The exhibits are described as follows:

Arizona

5. Attached hereto as AZ-1 is the declaration of Karen Pugliesi, Executive Vice President and Provost of Northern Arizona University.
6. Attached hereto as AZ-2 is the declaration of Daniel R. Erickson, Superintendent of Sonoita Elementary School District.

7. Attached hereto as AZ-3 is the declaration of Carolyn W. Stewart, Superintendent of Bullhead City School District #15.

8. Attached hereto as AZ-4 is the declaration of Ruben Diaz, Superintendent of Baboquivari Unified School District.

California

9. Attached hereto as CA-1 is the declaration of Pamela Brown, Vice President of Institutional Research and Academic Planning for the University of California.

10. Attached hereto as CA-2 is the declaration of Nathan S. Evans, Associate Vice Chancellor, Academic Affairs for the California State University.

11. Attached hereto as CA-3 is the declaration of Ingrid Roberson, Chief Deputy Superintendent at the California Department of Education.

12. Attached hereto as CA-3 is the declaration of Dr. Sylvia Greenwood, Acting Associate Superintendent of Human Resources for West Contra Costa Unified School District.

Colorado

13. Attached hereto as CO-1 is the declaration of Dr. Matt Gianneschi, President of Colorado Mountain College.

14. Attached hereto as CO-2 is the declaration of Leticia Levi, Senior Manager of the Educator Pathways and Development for Denver Public Schools.

Connecticut

15. Attached hereto as CT-1 is the declaration of Karen Buffkin, General Counsel and Secretary to the Board Regents for the Connecticut State Colleges and Universities (CSCU) system.

16. Attached hereto as CT-2 is the declaration of Nancy Navarretta, Commissioner of the State of Connecticut Department of Mental Health and Addiction Services.

Delaware

17. Attached hereto as DE-1 is the declaration of Cynthia Marten, Secretary of Education for the Delaware Department of Education.

Hawaii

18. Attached hereto as HI-1 is the declaration of Jan N.S. Gouveia, Vice President of Administration for the University of Hawai'i System.

19. Attached hereto as HI-2 is the declaration of Debora Halbert, Vice President for Academic Strategy for the University of Hawaii System.

20. Attached hereto as HI-3 is the declaration of Leonard R. Gouveia, Jr., Executive Director of the Research Corporation of the University of Hawai'i.

Illinois

21. Attached hereto as IL-1 is the declaration of Dr. Marie Lynn Miranda, Chancellor of the University of Illinois Chicago, and Vice President of the University of Illinois System.

22. Attached hereto as IL-2 is the declaration of Dr. Tony Sanders, State Superintendent of Education of the Illinois State Board of Education.

23. Attached hereto as IL-3 is the declaration of Christine Murphy Judson, Executive Director, Talent Acquisition for Chicago Public Schools.

Maryland

24. Attached hereto as MD-1 is the declaration of David L. Di Maria, Vice Provost for Global Engagement at the University of Maryland, Baltimore County.

25. Attached hereto as MD-2 is the declaration of Amy Ramirez, Executive Director, Global Learning and International Services for the University of Maryland, Baltimore.

26. Attached hereto as MD-3 is the declaration of Emily Nielson, Chief Capital Officer for Baltimore City Public Schools.

Massachusetts

27. Attached hereto as MA-1 is the declaration of Denise Barton, Chief Deputy General Counsel for the University of Massachusetts.

Michigan

28. Attached hereto as MI-1 is the declaration of Elizabeth Hertel, Director of the Michigan Department of Health and Human Services.

Minnesota

29. Attached hereto as MN-1 is the declaration of Eric Davis, Vice Chancellor for Human Resources for the Minnesota State Colleges and Universities.

30. Attached hereto as MN-2 is the declaration of Diane Rydrych, Division Director of the Minnesota Department of Health.

Nevada

31. Attached hereto as NV-1 is the declaration of Katie Korgan, Acting Executive Vice President and Provost of the University of Nevada, Las Vegas.

New Jersey

32. Attached hereto as NJ-1 is the declaration of John A. Pelesko, Ph.D., Provost and Executive Vice President for Academic Affairs at the New Jersey Institute for Technology.

33. Attached hereto as NJ-2 is the declaration of Eric Garfunkel, Vice President for Global Affairs at Rutgers University.

New York

34. Attached hereto as NY-1 is the declaration of Christopher Coulston, University Executive Deputy General Counsel for the City University of New York.

35. Attached hereto as NY-2 is the declaration of Anne Bink, Senior Vice Chancellor for Operations and Management and Chief Operating Officer for the State University of New York.

36. Attached hereto as NY-3 is the declaration of Dr. Sewit Teckie, Vice President Clinical Operations at New York City Health and Hospitals Corporation.

North Carolina

37. Attached hereto as NC-1 is the declaration of Maurice Green, North Carolina Superintendent of Public Instruction.

38. Attached as hereto NC-2 is the declaration of Dr. Eric L. Cunningham, Superintendent of Halifax County Schools.

Oregon

39. Attached hereto as OR-1 is the declaration of Dr. Roy Haggerty, Provost and Executive Vice President for Oregon State University.

40. Attached hereto as OR-2 is the declaration of Lindsay Pepper, Director of Scholar Services for the University of Oregon.

Rhode Island

41. Attached hereto as RI-1 is the declaration of Kristin Johnson, Vice Provost at the University of Rhode Island.

Vermont

42. Attached hereto as VT-1 is the declaration of Dr. Kirk Dombrowski, Vice President for the University of Vermont.

Washington

43. Attached hereto as WA-1 is the declaration of Timothy H. Dellit, M.D., Chief Executive Officer of University of Washington School of Medicine.

44. Attached hereto as WA-2 is the declaration of Ursula Elspeth Owen, J.D., International Scholars Operations Manager for the University of Washington.

45. Attached hereto as WA-3 is the declaration of Katherine Hellmann, Director of International Student and Scholar Services for Washington State University.

46. Attached hereto as WA-4 is the declaration of Faye-Lynn Gallant, Associate Vice President of Strategy, Management and Budget for Western Washington University.

47. Attached hereto as WA-5 is the declaration of Caren Lincoln, Senior Director of Human Resources for Eastern Washington University.

Wisconsin

48. Attached hereto as WI-1 is the declaration of Frances Vavrus, Vice Provost and Dean at the University of Wisconsin-Madison.

Dated: February 6, 2026
Los Angeles, California

/s/ James E. Richardson
JAMES E. RICHARDSON
Attorney for Plaintiff, State of California