

**UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND**

STATE OF NEW YORK; et al.,

Plaintiffs,

v.

DONALD TRUMP, in his official capacity
as President of the United States; et al.,

Defendants.

C.A. No. 1:25-CV-00039-JJM-PAS

DECLARATION OF DR. GREG HIRTH

I, Greg Hirth, declare as follows:

1. I am the Vice President for Research at Brown University (“Brown”) in Providence, Rhode Island. I have held that position since February 4, 2025, after serving as interim Vice President for Research starting in September 2024. I am also a Professor of Earth, Environmental, and Planetary Sciences, and a federally funded researcher. I have been on the faculty at Brown since 2007. I make this declaration in support of Plaintiffs’ Motion for a Preliminary Injunction.

2. As Vice President for Research, I have personal knowledge of the contents of this declaration, or have knowledge of the matters based on my review of information and records gathered by Brown University personnel in the Division of Research, and could testify thereto.

3. Brown is a major research institution. In fiscal year 2024, we received over \$254 million in federal funding from the National Institutes of Health (“NIH”), Department of Defense, Department of Veterans Affairs, National Aeronautics and Space Administration (“NASA”), National Science Foundation (“NSF”), and numerous other federal agencies. In addition, as a vital

anchor institution and top 10 employer in Rhode Island, Brown plays a major role in the economic well-being of the state and its residents.

4. The federal funding Brown receives supports cutting-edge, multi-year research projects spanning a wide range of subjects in the national interest, including national security, human health, and emerging areas of science and technology. As a research university with the only schools of public health and medicine in Rhode Island, Brown contributes to world-class medical care, strong patient outcomes, and innovative solutions for pressing health challenges facing all communities.

5. For example, Brown's School of Engineering receives funding from the Office of Naval Research to conduct research that supports and advances the U.S. Navy's capabilities in anti-submarine warfare. In particular, Brown researchers are currently working under a \$2.72 million federal grant that spans four years (July 2023 through June 2027) to develop the necessary science and technology to make unmanned undersea vehicles lighter, more maneuverable, and more resistant to failure under extreme environments.

6. Work conducted through Brown's School of Public Health provides further examples of our critical research projects:

- a. Researchers are using \$71 million in NIH funding over six years (July 2019 through June 2025) to accelerate the science of dementia care through embedded pragmatic clinical trials, which impacts millions of Americans and their care partners;
- b. Researchers are using \$660,000 in funding from the National Institute of Diabetes and Digestive and Kidney Disease for the first year of a 2.5-year

project to study methods to improve nutrition and healthy eating habits of preschool-aged children;

- c. Researchers anticipate using \$6.6 million over approximately 3.5 years (August 2024 through May 2029) from the National Heart, Lung and Blood Institute to study the early identification and prevention of coronary heart disease.

7. Another example of important work made possible through federal funding is NASA's Rhode Island Space Grant Program ("RISG"), for which Brown has been the lead institution since 1991. With \$4.7 million in funding from RISG for the current five-year period of performance (April 2020 through April 2025), Brown's Department of Earth, Environment and Planetary Sciences promotes the study of science, math, engineering, and technology at all educational levels—from primary to post-secondary—to create a pipeline for and support NASA's space exploration and research. A renewal application to continue the program after April 2025 is currently under review at NASA. Notably, the RISG consortium comprises a number of private and public institutions in the Rhode Island area that benefit from this federal funding, including Brown University, Bryant University, Community College of Rhode Island, Providence College, Rhode Island College, University of Rhode Island, Roger Williams University, Salve Regina University, Wheaton College (MA), and the Museum of Natural History & Planetarium in Providence.

8. Brown works in partnership with the federal government in its research endeavors, and the institution shoulders a substantial portion of the research costs. In fiscal year 2024, Brown's total Research & Development expenditures totaled over \$374 million, with Brown contributing \$69.8 million. Brown's contributions include institutionally financed research,

matching funds or cost-sharing on active projects, and unrecovered direct costs. Over the last two years, Brown's contribution to its institutional research enterprise has grown by \$13 million.

9. Following the Office of Management and Budget's issuance of M-25-13 ("OMB Memo") on January 28, 2025, Brown experienced near-immediate disruptions to its ongoing research projects.

10. For example, on February 3, 2025, Brown was scheduled for an NIH review of the five-year renewal application for the dementia care research project described in Paragraph 6. That morning, the NIH informed Brown that, because all federal advisory committee meetings had been canceled, Brown's advisory committee meeting to review its renewal application was also canceled. That renewal application represents \$83 million in potential federal funding.

11. The federal advisory committee meeting has not been rescheduled, and no additional guidance has been provided from the agency to date.

12. The renewal is scheduled to begin on July 1, 2025, but cannot move forward without the review meeting. I expect this uncertainty may have significant consequences for data vendors and clinical trials that are critical for this large-scale research. In addition, over 80 staff members at Brown are paid either fully or partially by this funding. If the renewal is delayed, that would impact the availability of personnel, resources, and third-party relationships required for the continuation of this research.

13. Other work also remains disrupted, despite the Temporary Restraining Order issued in this litigation on January 31, 2025. For example, Brown received a stop-work order on a subaward titled "Marshaling Evidence, Partnerships, and Learning to Combat Domestic Erosion," which in turn supports a U.S. State Department grant. The prime institution for the federal grant

reported that the funding was suspended as of January 24, 2025, because it “no longer effectuates agency priorities.”

14. And Brown’s NSF Postdoctoral Fellows—who perform entrepreneurial research in a range of science and engineering fields, and are paid directly from NSF—did not receive their pay as scheduled at the end of January/start of February. Some still have not been paid to date.

15. Following the issuance of the OMB memo, Brown advised our research community to hold off on large equipment purchases, given the uncertainty around the availability of federal funds going forward. This is a temporary measure, but longer term, it will affect the ability of researchers to carry out their work.

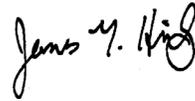
16. If the pause in federal financial assistance were to be reinstated, or if such funding were to be withdrawn permanently, all of Brown’s research programs that rely on federal funding—including those outlined in Paragraphs 5–7, above—would be in jeopardy. That would include funding for research and programs from the Medical School and School of Public Health, to the School of Engineering, to all corners of the Physical Sciences, including Physics, Earth Sciences, Computer Sciences, Chemistry, and Applied Mathematics.

17. Research programs that depend on federal funding would need to be severely downsized or even suspended. These types of disruptions threaten a loss of institutional memory with respect to key research tasks, as well as critical technical staff support. Furthermore, an extended pause would jeopardize the ability to pay salaries, and thus the continuity of research for a broad range of research scientists, postdoctoral associates, and graduate students. This lack of—or even significant uncertainty around—federal research funding will make it more difficult for domestic universities like Brown to recruit talented faculty and student researchers to work on these important projects. All these disruptions, interruptions, and uncertainty in federal research

funding and the resulting staffing gaps will in turn significantly compromise scientific advancement in numerous areas critical to the public interest, including national security, human health, and innovations in science and technology.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 5, 2025, at Providence, Rhode Island.

A handwritten signature in black ink, appearing to read "Greg Hirth". The signature is written in a cursive style with a large, stylized initial "G".

Greg Hirth