

EXHIBIT 25

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

AMERICAN PUBLIC HEALTH
ASSOCIATION, *et al.*,

Plaintiffs,

v.

NATIONAL INSTITUTES OF HEALTH, *et*
al.,

Defendants.

Case No. 1:25-cv-10787-BEM

DECLARATION OF NEAL SWEENEY ON BEHALF OF UAW

I, Neal Sweeney, pursuant to 28 U.S.C. § 1746, declare as follows:

1. My name is Neal Sweeney. My job title is Organizer, UAW Higher Education Department. My job duties include working closely with UAW local unions and UAW regions to develop strategic organizing goals and bargaining priorities to build power within the higher education sector; increasing membership engagement and mobilization through democratic, worker-led programs; supporting broad, diverse leadership development; and identifying and developing political and community action plans.
2. The International Union, United Automobile, Aerospace and Agricultural Implement Workers of America (UAW) is one of the largest and most diverse unions in North America, with members in the United States, Canada and Puerto Rico and in virtually every sector of the economy including approximately 120,000 workers in higher education – graduate students, postdoctoral scholars, researchers, university staff, and faculty – at institutions across the country. From UAW's earliest days, it has been a leader in the struggle to secure economic and social justice for all people. UAW has a strong history of supporting and bargaining for contract provisions that ensure diversity, equity and inclusion in the higher education sector and in all workplaces. UAW has been actively involved in every workers' rights and civil rights legislative battle since the 1930s, including the campaigns to pass the Civil Rights Act of 1964, the Voting Rights Act of 1965, the Fair Housing Act, the Civil Rights Restoration Act of 1988 and legislation to prohibit discrimination against women, the elderly and people

with disabilities. In addition, UAW has long advocated for increased federal funding for scientific research, recognizing its importance for innovation, economic growth, and public health.

3. The UAW International Executive Board (which includes the President, Secretary-Treasurer, three Vice Presidents and nine Regional Directors) is responsible for carrying out the programs and policies approved by the Constitutional Convention delegates and running the day-to-day operations of the International Union. The UAW President's Office includes a number of departments that support UAW members, including the Higher Education Department. UAW members belong to more than 600 local unions across the U.S., Canada and Puerto Rico. Local unions get support in organizing new members, bargaining contracts, handling problems with employers, member education, political action, community activities and more from both the national UAW offices and centers and each of the nine regional offices.

4. This lawsuit uses the labels "UAW Member" and "UAW Pre-Member" to identify UAW represented workers. The term "UAW Member" refers to a worker who is covered by a collective bargaining contract and who pays dues in an amount determined by their pay structure and whether they have a legal right to strike. Dues are set by UAW Constitutional Convention delegates. "UAW Pre-member" refers to a worker represented by the UAW in initial contract negotiations who is not yet covered by a contract. These workers intend to become dues-paying members as soon as their unit reaches a collective bargaining agreement.

5. Approximately 75,000 UAW-represented workers depend on funding from the National Institutes of Health ("NIH") for their jobs including salary, benefits, research costs including supplies and reagents, travel to academic conferences, and training and mentoring opportunities.

6. The following UAW-represented positions rely on NIH grants for financial support: Research Assistant, Graduate Research Assistant, Graduate Assistant, Research Associate, Student Assistant, Fellow, Research Fellow, Clinical Fellow, Graduate Student Researcher, Graduate Student Researcher - Fellow, Graduate Student Researcher - Trainee, Project Assistant, Prestigious Graduate Fellow, Postdoctoral Scholar, Postdoctoral Fellow, Postdoctoral Research Fellow, Postdoctoral Scholar Research Associate, Postdoctoral Scholar Fellowship Trainee, Postdoctoral Research Scientist, Postdoctoral Research Scholar, Associate Research Scientist, Associate Research Scholar, Research Scientist/Engineer, Project Scientist, Specialist, Professional Researcher, and Coordinator of Public Programs.

7. The following institutions employ UAW-represented workers who rely on NIH funding to support their jobs: University of Alaska, University of Washington, Washington State University, Western Washington University, University of California, California State University, California Institute of Technology, Pardee Rand Graduate School, University of Southern California, Saint Louis University, Princeton University, University of Pennsylvania, Pennsylvania State University, University of Maine, University of New Hampshire, University of Vermont, Northeastern University, Worcester Polytech Institute, University of Massachusetts, Harvard University, New York University, Columbia University, University of Connecticut, Albert Einstein School of Medicine, Rockefeller University, Weill Cornell Graduate School of Medical Sciences, Icahn School of Medicine at Mt. Sinai, as well as NIH Fellows who are part of the NIH Intramural Research Program.

8. The following UAW Locals represent NIH-funded workers: UAW Local 1907 (University of Alaska), UAW Local 4121 (University of Washington), UAW Local 4591 (Washington State University), UAW Local 4929 (Western Washington University), UAW 4811 (University of California), UAW 4123 (California State University), UAW Local 2478 (California Institute of Technology), UAW Local 872 (University of Southern California), UAW Local 2322 (University of Massachusetts and Worcester Polytech Institute), UAW Local 5118 (Harvard University), UAW Local 2110 (New York University), UAW Local 2710 (Columbia University), UAW Local 4100 (Columbia University and Icahn School of Medicine at Mt. Sinai), UAW Local 6950 (University of Connecticut), and UAW Local 2750 (NIH Fellows). For initial contract negotiations, workers are represented by the UAW International and are assigned to a local union by the International Executive Board following ratification of the first collective bargaining agreement.

9. Since late January 2025, UAW has witnessed mounting disruptions in NIH-funded research across the campuses where our members work. UAW local unions and the International Union have fielded an increasing volume of inquiries and grievances regarding employers attempting to prematurely end term positions via layoffs, lack of notice for layoffs, and other abrupt changes to work assignments and funding.

10. Our members are at the front lines of American biomedical research—developing therapies, conducting basic science, and contributing to public health advancement. Yet their careers are being destabilized by bureaucratic inaction and unexplained political interference. UAW members have many concerns including:

- a. *Job Insecurity and Interrupted Appointments:* We have received widespread reports that members' employment terms have been shortened and renewal decisions delayed, or start dates rescinded because of uncertainty surrounding cancellations or threatened cancellations of NIH funding. Postdocs, research staff, and graduate student researchers in particular have been told by principal investigators (PIs) that they cannot be reappointed unless or until NIH makes funding determinations that are months overdue. For example, at one institution, University of California, since March 5, 2025, we have received 17 layoff notices, 2 reductions-in-time, and 6 non-renewals of contracts due to NIH funding cuts and delays. These numbers are sure to increase as the number of cancelled grants increases, and due to further delays in both the issuance of new awards and renewal of existing awards. Some of the impacted members are on F-1, H-1B or J-1 visas and could be at risk of deportation if their positions are ended.
- b. *Disruption of Research and Academic Progress and Missed Career Milestones:* Many of our members report being unable to complete their experiments or thesis research. Some have had to abandon critical data collection due to the unavailability of lab resources. NIH grant uncertainty has caused members to pause ongoing projects, re-scope dissertation topics, and in some cases, consider leaving their programs entirely. Many institutions have frozen hiring including the University of California, Harvard University, University of Washington, Washington State University, Columbia University, and the University of Pennsylvania. As many of our members are on term positions and are rehired or reappointed on a periodic basis, a hiring freeze could result in them losing their jobs. For example, at University of California San Francisco, a grant to study infectious diseases was suddenly cancelled leaving hundreds of researchers without funding to complete a multi-year study. Across institutions, members planned to apply for K99 or other independent NIH awards this spring but were advised by faculty to delay applications until NIH resumes normal operations. We are aware of members who have withdrawn from job searches, declined postdoctoral offers, or may need to delay graduation due to NIH-related instability. In addition, we are aware of members who are seriously exploring opportunities outside the United States as a result. In another example, over 200 researchers are being impacted by the cancellation of a single grant at one University of California campus, including postdoctoral researchers in infectious

diseases who were told by their PI that their appointment could be ended in as soon as 30 days.

- c. *Irreparable Harm.* The loss of stability, research continuity, and training momentum is already having lasting effects. Even if NIH resumes normal grant processing and ceases terminating grants tomorrow, the damage done to our members' careers, experiments, immigration status, and trust in the research enterprise is irreversible. The delays are already chilling career interest in graduate education and postdoctoral research, which threatens to create downstream shortages of qualified biomedical researchers and faculty. In addition, the harms fall disproportionately on international scholars, first-generation college graduates, and members of underrepresented communities who cannot weather prolonged uncertainty or self-fund their research careers. Many of the affected members are first-generation scholars or from historically marginalized groups, including those working on NIH-funded disparities research. These disruptions will have a disproportionate effect on efforts to diversify the biomedical research workforce.

11. The following are among the types of NIH grants on which UAW-represented workers rely that that have either been cancelled or threatened with cancellation: Individual Fellowships to promote diversity including F31, F32, D-SPAN; Training grants including T32; Career development awards including MOSAIC K99/R00, K12 and Institutional Research and Academic Career Development Awards (IRACDA); Science Education Partnership Award (SEPA); Post-baccalaureate Research Education Program (PREP); R-series grants including Diversity Supplements to NIH R01 awards, Initiative for Maximizing Student Development (IMSD) R25, and other R-series grants; Maximizing Access to Research Careers (MARC) Program; and Antiviral Drug Discovery (AViDD) Centers for Pathogens of Pandemic Concern.

12. Below are examples of the research done by UAW members that has been impacted by NIH's grant cuts:

- a. Studies on cancer biology including how cells respond to DNA damage;
- b. Studies on how to better treat traumatic brain injuries, which disproportionately impact combat veterans;
- c. Research exploring muscle regeneration following traumatic muscle injuries;
- d. Studies on the toxicity of pollutants in the atmosphere including nanoplastics;
- e. Research on cognitive health and chronic disease in older adults;

- f. Studies aiming to understand brain developmental disorders;
- g. Research on new treatments for chronic pain and substance use; and
- h. Studies on mitigating bone loss during cancer treatments.

13. I have seen or heard about more than 100 grant cancellation notices received by UAW members. An example of the language used in such notices is: “I am writing to let you know that due to changes in NIH/HHS priorities, the maximizing opportunity for scientific and academic independent careers (MOSAIC) program has been terminated. Your institution can continue to draw funds on any active award for allowed costs that are within scope and consistent with the Grant policy statement. Further awards will not be made, and NIGMS will not permit no cost extensions.”


14. Many of the UAW members who have received these cancellation notices received the same generic explanation—that the grant or fellowship was being cancelled due to “changes in NIH/HHS priorities.”

15. UAW is a plaintiff in this lawsuit to protect UAW-represented workers’ terms & conditions of employment insofar as NIH directly funds UAW member jobs and the loss or threatened loss of funding jeopardizes UAW members’ jobs, as well as training opportunities NIH would have funded. In addition, UAW has a long-standing history of supporting increased federal funding for scientific research, recognizing its importance for innovation, economic growth, and public health.

16. Given the public statements made by members of the Trump Administration and targeting of individuals who participated in past legal efforts, UAW members have expressed fears that participating publicly in this lawsuit could jeopardize their future eligibility for federal research funding. As many of our members are early career scientists, access to such federal funding is essential to their long-term academic and research goals, and losing these opportunities would significantly disrupt their career trajectories. In addition, given the current political climate surrounding diversity, equity and inclusion efforts, many have expressed to me that public participation could negatively affect how they are perceived by colleagues, both at their institutions and in the broader field where they work, and thereby impact future job opportunities, and by the public at large.

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

Executed this 20th day of April, 2025.


Neal Sweeney