

EXHIBIT 52

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-WGY

SUPPLEMENTAL DECLARATION OF NICOLE MAPHIS

I, Nicole Maphis, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I provided a sworn declaration in this case dated April 20, 2025. I offer this additional declaration as a supplement to that first declaration.
2. On May 8, 2025, I checked the status of my pending MOSAIC K99/ROO application on the NIH era commons webpage. As shown on that webpage, my application status had changed to “Application withdrawn.” A true and correct copy of that page is attached as Exhibit A.
3. That same page had a document entitled ‘Administrative Withdrawal’ linked to the Correspondence tab. I clicked on that link and found a notice from the Department of Health & Human Services, dated May 6, 2025, that reads: “This application responded to a discontinued program that no longer effectuated NIH priorities which included elements based primarily on artificial and non-scientific categories, including amorphous equity objectives, are antithetical to the scientific inquiry, do nothing to expand our knowledge of living systems, provide low returns on investment, and ultimately do not enhance health, lengthen life, or reduce illness. Worse, so-called diversity, equity, and inclusion (“DEI”) studies are often used to support unlawful discrimination on the basis of race and other

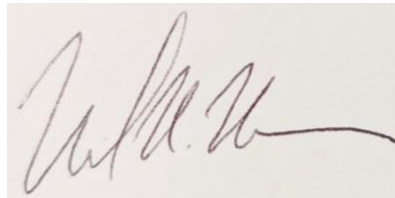
protected characteristics, which harms the health of Americans. Therefore, this application has been administratively withdrawn.” A true and correct copy of this notice is attached as Exhibit B.

4. My pending MOSAIC K99/ROO application sought a grant to study the relationship between alcohol use and Alzheimer’s Disease. That proposed study has no relationship to “DEI studies” as described in this May 6 notice.

5. I received no email or other notice from NIH informing me of this change in the status of my application or reason for that change.

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

Executed this 15th day of May, 2025.

A handwritten signature in dark ink, appearing to read "Nicole M. Maphis", with a long horizontal flourish extending to the right.

Nicole M. Maphis

EXHIBIT A



Commons



Status |


[« Return to PI Search](#)
Notes & Tips:

- **Important:** The NIH provides the JIT (Just in Time) link in the Commons for scored applications. Please await instructions from the NIH on whether to complete this information
- **Reminder:** All PDF files should be flattened before uploading to ensure successful submission. See [instructions on how to flatten a PDF](#).

✓ Grouped View

Flat View

Status Result - List of Applications/Awards ? 5

▼ K99AA032041

2

07/01/2025 -
06/30/2030
(Project Period)

Maphis, Nicole
Marie (PD/PI)

Role of Neural Excitatory
Inhibitory Balance on the
Spread of Pathological Tau
in Alcohol Dependence
(Title)

Withdrawn

Application/Award ID	Grants.gov Tracking#	Proposal Title	PD/PI Name	eSubmission Status	Current Application Status	Status Date	Available Actions
1K99AA032041-01A1	GRANT14299745	Role of Neural Excitatory	Maphis, Nicole	Submission Complete	Withdrawn	05/06/2025	

Application/Award ID	Grants.gov Tracking#	Proposal Title	PD/PI Name	eSubmission Status	Current Application Status	Status Date	Available Actions
		Inhibitory Balance on the Spread of Pathological Tau in Alcohol Dependence	(PI)				
1K99AA032041-01	GRANT14068451	Neuroexcitability and Tauopathy: Unraveling the Link Between Alcohol Use Disorder and Alzheimer's Disease	Maphis, Nicole (PI)	Submission Complete	Not Discussed	06/12/2024	JIT

Status Result - List of Applications/Awards

➤ L70AA030440

1

07/01/2022 -
06/30/2024
(Project Period)

Maphis, Nicole
Marie (PD/PI)

Identification of neuronal ensembles regulating risky decision-making in adolescent mice with prenatal alcohol exposure (PAE) (Title)

Inactive

➤ F31AG066453	1	09/01/2019 - TBD (Project Period)	Maphis, Nicole Marie (PD/PI)	The role of microglia autophagy in the clearance of pathological tau following immunotherapy (Title)	Administratively Withdrawn by IC
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➤ Application ID Not Yet Assigned	1	09/01/2019 - TBD (Project Period)	Maphis, Nicole Marie (PD/PI)	The role of microglia autophagy in the clearance of pathological tau following immunotherapy (Title)	Application has been entered into computer
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Resources

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05/08/2025 10:59:39 AM EST

EXHIBIT B



DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

National Institutes of Health
Bethesda, Maryland 20892

www.nih.gov

May 6, 2025

This application responded to a discontinued program that no longer effectuated NIH priorities which included elements based primarily on artificial and non-scientific categories, including amorphous equity objectives, are antithetical to the scientific inquiry, do nothing to expand our knowledge of living systems, provide low returns on investment, and ultimately do not enhance health, lengthen life, or reduce illness. Worse, so-called diversity, equity, and inclusion (“DEI”) studies are often used to support unlawful discrimination on the basis of race and other protected characteristics, which harms the health of Americans. Therefore, this application has been administratively withdrawn.