

# EXHIBIT 54

**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 KATIE EDWARDS**

I, Katie Edwards, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I provided a sworn declaration in this case dated April 24, 2025. ECF No. 38-20. I offer this additional declaration as a supplement to that declaration.
2. I am offering this supplemental declaration in my individual capacity and not on behalf of my employer.
3. Since my April 24, 2025 declaration, I have had to reduce the hours of at least four team members whose jobs were funded largely or entirely through the terminated NIH grants that were discussed in that declaration. Specifically, those individuals were funded through the terminated R01 grant discussed in detail in that declaration (Project Number 5R01MD016384), and their work focused on the research funded through that grant. *See* ECF No. 38-20 ¶ 9. Prior to the termination of this grant, some of these individuals worked as many as ten to twenty hours a week on that project; now, because of this termination, they each work substantially fewer hours a week; they have consequently lost pay, and that reduction of hours has already had a substantial negative effect on this study.
4. As noted in my April 24, 2025 declaration, this grant funded a survey that collected data from over 3,100 participants. ECF No. 38-20 ¶ 11. Prior to the termination of the grant, the work of these individuals included sending out surveys every six months to participants,

following up with and sending reminders to the participants to complete their surveys, compensating participants as a result of their participation in the study, and generally liaising with and responding to study-related questions from the participants.

5. But because NIH terminated this grant, we have had to completely stop collecting data for this study, and we have put the study on hold, meaning most of the study's participants at this time are unable to complete all of the surveys the study originally set out to perform. *See* ECF No. 38-20 ¶¶ 11, 23. As I elaborated on in my April 24, 2025 declaration, cutting off the study prematurely will have several negative consequences for the study itself, the area of research, and the participants and communities served by this research. *See* ECF No. 38-20 ¶ 23.
6. Although my co-investigators and I have continued to try to raise funds to replace the funding from this grant and the other terminated NIH grants I mentioned in my April 24, 2025 declaration, I have to date only been able to raise approximately \$10,000 in funds to replace those terminated funds. To put that figure in perspective, the award for just the R01 grant discussed above for just the 2025-2026 fiscal year amounted to over \$750,000.00 in funding.
7. My co-investigators and I will keep trying to raise replacement funding. We are passionate about our field and work, and we are committed to addressing the health equity needs of our study participants and the broader populations served by our research. But I still do not anticipate being able to raise nearly enough money to secure the amount of funding (millions of dollars) that we would have had with the NIH grants that have been terminated since March 2025.
8. Without replacing the funding from those terminated grants, I anticipate having to let go of or substantially reduce the hours of far more staff members over the next few months. That would not only negatively affect their jobs and livelihoods, but it would also negatively affect the studies they work on, the participants they work with, and the populations who would be served by the research that will now be limited, stalled, or even fully cut off because of these terminations.
9. I have continued to regularly work more than 15 hours a day, trying to juggle my research with my efforts to replace funding lost because of these NIH grant terminations. But because I have had to focus so much on raising funds to make up for the loss of funding resulting

from the termination of the NIH grants, the amount of time I can spend conducting my research, reviewing literature, or designing new studies to address the public health needs of the communities served by my research has been significantly reduced.

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

Executed this 18 day of May, 2025.

A handwritten signature in cursive script that reads "Katie Edwards". The signature is written in dark ink on a light-colored background.

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Katie Edwards