EXHIBIT 56

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

SECOND 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, and May 18, 2025, ECF No. 72-12. I offer this additional declaration as a supplement to those declarations.
- 2. I am offering this supplemental declaration in my individual capacity and not on behalf of my employer.
- 3. Since my May 18, 2025 declaration, I have been told by my institution—the University of Michigan—that they will be providing me with approximately \$297,000 of bridge funding before the fiscal year ends in June 2025. The University of Michigan has emphasized to me that this is a one-time source of funding. I am immensely grateful to my institution for this support for our team and our work.
- 4. But unfortunately, my team's operating budget was over \$200,000 *a month* before the NIH grant terminations, and this funding represents just a fraction of the approximately \$2 million my lab spends each year on our work. As a result, although I fortunately do not anticipate having to make further cuts to staff or their hours for approximately two or three months, without additional funding at the level provided, I anticipate once again having to make significant cuts to staff jobs and hours around that time. That will 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.
- 5. My co-investigators and I have continued to try to raise funds to replace the funding from the terminated NIH grants I mentioned in my April 24, 2025 declaration. But beyond the support from the University of Michigan described above, I have to date been able to raise only approximately \$10,000 in funds to replace those terminated funds. To put that in perspective, that amount combined is less than half the amount of just the 2025-2026 fiscal year of the R01 grant (Project Number 5R01MD016384) I described in my May 18 declaration.
- 6. Because my co-investigators and I have to date been able to replace only a fraction of the amount provided by the terminated NIH grants, we have still not been able to resume collecting data for our studies, including the studies I described in detail in my April 24, 2025 declaration. We do not have sufficient funding to compensate participants long term, and I believe resuming our work just to shortly pause it again shortly thereafter would raise ethical concerns around our participants.
- 7. Instead, these limited funds will be used largely to help mitigate some of the fallout from these grant terminations. My team continues to respond to participants about any questions they have related to the study (e.g., what happened with the study, if the study will resume) and to provide participants with connection to community resources. We are also performing a limited analysis of some of the data we have collected for the R01 grant I described in my May 18 declaration (Project Number 5R01MD016384). But that analysis (essentially, basic percentages)—based on incomplete datasets and without the staffing required to perform more complex statistical analyses—does not yield the kind of statistical significance or robust programmatic and policy recommendations that I set out to do when I first submitted the applications for these projects. We are performing basic analyses because we promised participants that they would receive a copy of the study results. Even though the results are incomplete and basic, we have decided to give participants something rather than nothing to uphold our promise to participants.
- 8. As I stated in my May 18, 2025 declaration, 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.
- 9. Just as was the case in my May 18 declaration, 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. And because I have still 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 continues to be significantly reduced compared to the time before my grants were terminated.

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

Executed this <u>9th</u> day of June, 2025.

Katte Edwards

Katie Edwards