

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

AMERICAN ASSOCIATION OF
UNIVERSITY PROFESSORS, LEONARD
BRIGHT, VANITA REDDY, LONDON
SADLER, and AARON GEORGE,

Plaintiffs,

v.

ROBERT L. ALBRITTON, JAY GRAHAM,
DAVID C. BAGGETT, JOHN W.
BELLINGER, JAMES R. BROOKS,
MICHAEL A. HERNANDEZ III, WILLIAM
MAHOMES JR., KELLEY SULLIVAN
GEORGIADES, and SAM TORN, in their
official capacities as members of the Texas
A&M University System Board of Regents,

Defendants.

CIVIL ACTION NO. 4:26-cv-
06268

**DECLARATION OF AMERICAN ASSOCIATION OF UNIVERSITY PROFESSORS IN
SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

I, Todd Wolfson, declare as follows:

1. The facts set forth in this Declaration are based on my personal knowledge, and if called as a witness, I could and would competently testify to the following matters under oath.

2. I am President of the American Association of University Professors ("AAUP"). I have served in that position since June 2024. I also previously held various leadership roles for the Rutgers University chapter of AAUP, including as the chapter's President and Vice President. I am also a trained anthropologist and an Associate Professor of Journalism and Media Studies at

Rutgers. I received my Ph.D. in Anthropology and Social and Cultural Foundations of Education from the University of Pennsylvania. I am authorized to provide this Declaration on behalf of AAUP, which is a Plaintiff in the above-captioned matter.

3. The AAUP is a union and membership organization of faculty and other academic professionals based at colleges and universities around the country. The AAUP has over 500 chapters nationwide and members at every campus in the Texas A&M University System.

4. AAUP has hundreds of members spread across every campus in the Texas A&M University System. These members include part-time and full-time faculty, graduate students, and staff involved in the academic mission of the University. To join AAUP, members must voluntarily opt in and pay monthly dues. AAUP also has associate members at multiple Texas A&M University System campuses. Associate members are undergraduate students, staff not involved in the academic mission or in administrative roles, and community members who would not be eligible for full AAUP membership.

5. There are AAUP chapters at East Texas A&M University, Prairie View A&M University, Tarleton State University, Texas A&M International University, Texas A&M University–Central Texas, Texas A&M University–College Station, Texas A&M University–Corpus Christi, Texas A&M University–Kingsville, Texas A&M University–San Antonio, Texas A&M University–Texarkana, and West Texas A&M University.

6. Even if a specific campus does not have a chapter, prospective members can still join the AAUP by filling out an online application and electing to pay monthly dues.

7. AAUP chapters work to advance the mission of the AAUP through advocacy and organizing.

8. The mission of the AAUP is to advance and protect academic freedom and shared governance; to define fundamental professional values and standards for higher education; to promote the economic security of faculty, academic professionals, graduate students, postdoctoral fellows, and all those engaged in teaching and research in higher education; to help the higher education community organize to make our goals a reality; and to ensure higher education's contribution to the common good.¹

9. Advancing and protecting academic freedom stands at the core of the AAUP's mission. The AAUP defines academic freedom as "the freedom of a teacher or researcher in higher education to investigate and discuss the issues in their academic field, and to teach and publish findings without interference from administrators, boards of trustees, political figures, donors, or other entities."²

10. Academic freedom pertains to four interrelated elements: teaching, research, intramural speech, and extramural speech. *Id.* Academic freedom with respect to teaching is the freedom to discuss all relevant matters in the classroom. *Id.*

11. The AAUP has a Committee on Academic Freedom and Tenure, which promotes principles of academic freedom, tenure, and due process in higher education through the development of policy documents relating to these subjects and the application of those principles to particular situations that are brought to its attention. The Committee has authorized AAUP staff to receive, on behalf of the committee, complaints of departures from these standards.

12. The AAUP has adopted and published a policy statement on the freedom to teach.³ The policy provides that "[t]he freedom to teach includes the right of faculty members to select

¹ AAUP, *About the AAUP*, <https://perma.cc/K5VB-RNJS>.

² AAUP, *FAQs on Academic Freedom*, <https://perma.cc/57ZW-W72G>.

³ AAUP, *The Freedom to Teach*, <https://perma.cc/B6YX-LW55>.

the materials, determine the approach to the subject, make the assignments, and assess student academic performance in teaching activities for which they are individually responsible, without having their decisions subject to the veto of a department chair, dean, or other administrative officer.” *Id.*

13. The AAUP believes that academic freedom is an indispensable requisite for unfettered teaching and research in institutions of higher education.

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

Executed on September 1, 2026.

/s/ Todd Wolfson