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16 *Attorneys for Plaintiffs and the Proposed Class*

17
 18 **UNITED STATES DISTRICT COURT**
 19 **NORTHERN DISTRICT OF CALIFORNIA**

20 NEETA THAKUR, et al.,

21 Plaintiffs,

22 vs.

23 DONALD J. TRUMP, et al.,

24 Defendants.

Case No. 3:25-cv-04737-RL

**SUPPLEMENTAL DECLARATION OF
 LOUISE BEDSWORTH IN SUPPORT OF
 PLAINTIFFS' COMBINED MOTION
 FOR SUMMARY JUDGMENT AND
 CLASS CERTIFICATION**

Judge: The Honorable Rita F. Lin

Hearing Date: October 20, 2026

Hearing Time: 10:00 AM

Courtroom: 4 – 17th Floor

SUPPLEMENTAL DECLARATION OF LOUISE BEDSWORTH

I, Louise Bedsworth, declare as follows:

1. I have personal knowledge of the facts set forth herein. If called as a witness, I could and would competently testify to the matters stated. I make this supplemental declaration in support of Plaintiffs’ Combined Motion for Summary Judgment and Class Certification.

2. The purpose of this supplemental declaration is to explain the roles of all UC researchers who were essential to terminated Department of Energy (“DOE”) grant DE-FE0032382 (Community Alliance for Direct Air Capture or “CalDAC project”), financially supported by that award, and harmed by its termination.

3. As Principal Investigator on the CalDAC project, I spent approximately 110 hours personally conceptualizing, drafting, and editing application materials. I additionally spent approximately 16 hours preparing complementary materials to secure a cost share award from the California Energy Commission (“CEC”), personally drafting both the application narrative and budget justification. This CEC application was necessary to meet DOE cost-share requirements.

4. Post-award, my work consisted of (a) organizing and providing guidance to the entire project team, which spans two UC units (Lawrence Berkeley National Lab (“LBNL”), and the Center for Law, Energy & the Environment (“CLEE”) at UC Berkeley School of Law); (b) contributing my expertise in carbon removal and management, integrated project design, stakeholder engagement, and project management; and (c) meeting regularly with DOE project managers, completing required reports to DOE, and working with partners and campus administrators to execute project subawards. I was to be paid for my time through a cost-share award that was cancelled by the CEC as a direct result of DOE’s grant termination.

5. Staff at LBNL spent significant time conceptualizing, drafting, and preparing materials for the grant application. They also contributed significant time during the contract negotiation process to prepare materials, engage with DOE, and collaborate with research partners.

a. During the application process, LBNL staff recruited all CalDAC

1 partners, led the development of significant portions of the application narrative, and played a
2 critical role in partner recruitment and stakeholder engagement.

3 6. Our project leadership team, which consisted of 4 LBNL staff, 2 UC Berkeley
4 staff (myself and the project manager), and one external partner met weekly for one hour from
5 November 2023, following announcement of the award, through April 2025 to coordinate
6 project implementation. This meeting occurred alongside the completion of individual tasks to
7 advance the project.

8 7. The research team working on the CalDAC grant with me at the time of
9 termination consisted of 10 additional UC researchers:

10 a. Diana Dombrowski, MS, Project Manager. Diana was hired full time to
11 work on this project. She had a substantive role leading analysis and engagement to
12 inform the social and governance feasibility analysis. She also served as the project
13 manager and coordinated many of the team meetings, administration of subawards, and
14 collection of project metrics for reporting.

15 b. Nine staff at LBNL, consisting of 7 full-time staff and 2 postdoctoral
16 fellows:

17 i. Dr. Hanna Breunig, PI for LBNL, Project Co-Lead, Hub
18 Development and Design Task Lead. Dr. Breunig lost funding and key
19 partnerships with Direct Air Capture (“DAC”) technology developers who could
20 have advanced commercialization of National Laboratory patents. The
21 termination also ended a key external strategic partnership for Dr. Breunig that
22 aimed to advance CO₂ conversion and capture.

23 ii. Dr. Jens Birkholzer, Senior Advisor to the Project. Dr. Birkholzer
24 lost funding to continue with this project and has since retired.

25 iii. Division Director, Environmental and Health Task Co-Lead. The
26 termination resulted in lost funding for this position.

27 iv. Division Director, CO₂ to Products Task Lead. The termination
28 resulted in lost funding for this position.

1 v. Dr. Newsha Ajami, Community Partnership and Benefits Task
2 Co-Lead. The termination resulted in lost funding; Dr. Ajami has since left her
3 position at LBNL.

4 vi. Dr. Preston Jordan, CO₂ Subsurface storage Task Lead. The
5 termination resulted in lost funding for Dr. Jordan, who has since retired.

6 vii. Dr. Tae Hwan Lim, Research Scientist on DAC technology
7 validation. The termination resulted in lost funding and Dr. Lim's appointment
8 ended as a result.

9 viii. Dr. Syed Saqline, Postdoctoral Fellow on DAC technology
10 systems analysis. The termination resulted in lost funding and Dr. Saqline's
11 appointment ended as a result.

12 ix. Dr. Beichen Zhang, Postdoctoral Fellow on DAC technology life
13 cycle assessment. The termination resulted in lost funding and Dr. Zhang's
14 appointment ended as a result.

15 8. As frequently occurs in grant applications and post-award correspondence, these
16 roles, and the roles of other researchers beyond the PI, are specified by function rather than
17 name in the budget that UC submitted to DOE for this grant.

18 9. The grant termination harmed UC Berkeley and LBNL research staff financially
19 and professionally.

20 a. Each of the researchers included in the project lost funding for their
21 positions due to DOE's termination and, in the case of myself as Principal Investigator,
22 cancellation of the cost share award resulting from DOE's termination. Project staff at
23 LBNL and UC Berkeley have had to redirect work to other funded project opportunities.

24 b. Each of the project team members lost valuable opportunities that would
25 have resulted from the grant, including development of a novel stakeholder-led
26 approach to feasibility study design and implementation and loss of strategic
27 partnerships with DAC companies and other researchers. This project had garnered
28 significant interest from policymakers, company partners, and other stakeholders who

1 looked to it as a model for development of innovative technologies. The project would
2 have resulted in valuable opportunities for publication, engagement with public and
3 private sector partners, and development of actionable research results.

4 c. The termination resulted in lost professional development and
5 employment opportunities:

6 i. The project manager, an early career researcher, has had to
7 redirect her work to other subject areas due to loss of funding. This has resulted
8 in a lost opportunity to build her professional expertise in carbon management
9 and to grow as a project manager.

10 ii. The grant termination resulted in termination of appointments for
11 three researchers at LBNL.

12 iii. In other cases, researchers retired or sought new jobs in the wake
13 of DOE's grant termination. I believe some of these researchers would have
14 postponed these events if they had the opportunity to complete the cutting-edge,
15 time-limited research project (CalDAC) to which they had already committed.

16 I declare under penalty of perjury under the laws of the United States of America and
17 the State of California that the foregoing is true and correct.

18 Executed on this 13th day of July 2026, at Berkeley, California.

19 Signed by:

20 *Louise Bedsworth*

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22 Louise Bedsworth
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