

Erwin Chemerinsky (admitted *pro hac vice*)
echemerinsky@law.berkeley.edu
Claudia Polsky (State Bar No. 185505)
cpolsky@law.berkeley.edu
U.C. BERKELEY SCHOOL OF LAW
Law Building
Berkeley, CA 94720-7200
Telephone: (510) 642-6483

Elizabeth J. Cabraser (State Bar No. 83151)
ecabraser@lchb.com
Richard M. Heimann (State Bar No. 63607)
rheimann@lchb.com
Kevin R. Budner (State Bar No. 287271)
kbudner@lchb.com
LIEFF CABRASER HEIMANN & BERNSTEIN, LLP
275 Battery Street, 29th Floor
San Francisco, CA 94111
Telephone: (415) 956-1000

Anthony P. Schoenberg (State Bar No. 203714)
tschoenberg@fbm.com
Linda S. Gilleran (State Bar No. 307107)
lgilleran@fbm.com
FARELLA BRAUN + MARTEL LLP
One Bush Street, Suite 900
San Francisco, California 94104
Telephone: (415) 954-4400
Facsimile: (415) 954-4480

Attorneys for Plaintiffs and the Proposed Class

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

NEETA THAKUR, et al.,

Plaintiffs,

vs.

DONALD J. TRUMP, et al.,

Defendants.

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

**DECLARATION OF JEFFREY LONG 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

1 I, Jeffrey Long, declare as follows:

2 1. I have personal knowledge of the facts contained in this declaration and, if called as
3 a witness, could and would testify competently to those facts.

4 2. I am a professor at UC Berkeley and a researcher at Lawrence Berkeley National
5 Laboratory.

6 3. By letters dated in October 2025, DOE informed me that grant EE0010499, which
7 pertained to recovering critical materials from spent photovoltaic cells, was being terminated. My
8 project was intended to advance environmental goals by reducing the need to mine virgin precious
9 materials, and to advance U.S. energy security goals by reducing vulnerabilities with respect to
10 precious metal supply chains. As originally awarded, DOE committed to a three-year grant for
11 \$500,000 annually (*i.e.*, \$1.5 million total). My laboratory's Research Group was mid-stream
12 when I received the DOE termination notice. A true and correct copy of the October 2, 2025 letter
13 is attached to the Declaration of Claudia Polsky In Support of Plaintiffs' Combined Motion for
14 Summary Judgment and Class Certification ("Polsky Declaration") at pages 6-7 of Exhibit A.

15 4. My grant application contemplated that the work proposed would be performed by
16 a multi-member scientific research team that would be a subset of members the Jeff Long
17 Research Group at UC Berkeley. The "personnel" tab of the budget spreadsheet, which was
18 submitted as part of the application, indicates that the research team would include both doctoral
19 candidates and postdoctoral fellows. A true and correct copy of the budget spreadsheet is attached
20 to the Polsky Declaration at page 8 of Exhibit A.

21 5. In addition to the impact of the grant termination on myself as a principal
22 investigator, a minimum of four research team members – and potentially as many as six – have
23 been substantially impacted by DOE's grant termination:

24 (a) **Dr. Shivani Sharma**, a Postdoctoral Researcher with a PhD in inorganic
25 chemistry with specialized expertise in critical metal recycling, was responsible for
26 synthesizing and characterizing novel porous polymers. She has been substantially
27 professionally harmed by the grant termination: in the wake of this termination, I
28 informed her that she would have to find another job, and she has since departed
UC Berkeley for a position in the private sector. In so doing, she lost the
opportunity to get to the major payoff of her major role in this research project: to
meet the goalpost, and publish a paper, and receive due credit for research results.
Because of the abruptness of the termination, she also lost the lead time necessary

1 to apply for further funding to conduct additional research projects in my Research
2 Group. More broadly, Dr. Sharma lost the opportunity to stay in academic research,
and was forced to switch career tracks by quickly finding an industry job.

3 (b) **Dr. Ethan Pezoulas**, who recently received his PhD under my mentorship,
4 was also professionally harmed by DOE's grant termination. The Research Group's
5 intent was to transition Dr. Pezoulas to work on the DOE-funded precious metals
6 recovery project in a post-doctoral capacity, but in light of the grant termination, he
7 was also required to find a job in industry rapidly. He lost an opportunity to work in
the area of his specialized chemistry training, and is now doing entirely unrelated
work at a plastics company in Ohio. Ethan's doctoral research in this area was cut
short by the termination of the award, which caused him to focus his studies more
on other areas. However, to my knowledge, his intention was always to pursue a
job in industry upon completing his PhD.

8 (c) **Dr. Hiroyasu Furukawa**, a senior Project Scientist with more than 30
9 years of chemistry experience who is integral to numerous Research Group
10 projects, has also been harmed by DOE's grant termination. His work on project
11 design and the drafting of reporting literature for the metals recovery project has
gone to waste, and he has been unable to realize the professional and reputational
12 fruits of his research efforts. Were the grant to be reinstated, Dr. Furukawa's time
would be reallocated to allow him to devote his advanced skills and a portion of his
time to this project.

13 (d) **Dr. Hsinhan Tsai**, another Postdoctoral Researcher, had a role similar to
14 Dr. Sharma's in synthesizing and characterizing novel porous polymers. Although
he left the Research Group to accept a professorship at University of Buffalo in
New York prior to DOE's grant termination, but for the termination, the Research
15 Group intended to back-fill his research role with a combination of three current
PhD students: **Mathew Santoso, Max Merovah, and Gabriel Espindola Khan**.
16 Each had a keen interest in participating in the precious metals recovery project
because of their hope to focus their doctoral dissertations on polymer chemistry:
17 this project was the Research Group's lab's *only* in-process polymer study. The
harm to their academic trajectories from grant termination is significant. Because
18 they have been forced to refocus their PhD research, they have been delayed in data
gathering, which will in turn delay publications. Such delays in producing
19 academic papers can extend a chemistry graduate student's time to PhD from the
usual five years to six or seven.

20 I declare under penalty of perjury under the laws of the State of California and the United
21 States that the foregoing is true and correct.

22 Executed on this 15th day of September 2026, in Berkeley, CA.

23 

24
25 _____
Jeffrey R. Long