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28 *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 VINOD
 NARAYANAN 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, Vinod Narayanan, 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 Director of the UC Davis Western Cooling Efficiency Center and Chair of
5 the UC Davis Mechanical and Aerospace Engineering Department. I am a principal investigator
6 on a terminated Department of Energy (“DOE”) grant.

7 3. By letter dated October 02, 2025, DOE informed me that grant DE-EE0010190 was
8 being terminated. The Solar Energy Technologies Office (SETO) within the Office of Energy
9 Efficiency and Renewable Energy had made this award to UC Davis for the project, *Enabling*
10 *Micro-pin Array Receivers for Power Generation and High-temperature Process Heating Using*
11 *Metal Additive Manufacturing – Development, Design and De-risk*. A true and correct copy of the
12 letter from DOE announcing termination of this grant is attached to the Declaration of Claudia
13 Polsky In Support of Plaintiffs’ Combined Motion for Summary Judgment and Class Certification
14 (“Polsky Declaration”) at pages 5-6 of Exhibit C.

15 4. This collaborative project among five universities, two companies, and a national
16 laboratory aims to advance high temperature solar for process heating in industrial applications,
17 such as drying and chemicals processing. A significant fraction of energy use in such industries is
18 in the form of heat. By enabling solar heat for these industrial processes, it is possible to advance
19 domestic manufacturing by adding an additional source of industrial heat and thereby strengthen
20 reliability of energy sources. The grant-funded project specifically aims to use metal Additive
21 Manufacturing (AM) to fabricate a key component of the solar heat loop, namely a solar receiver.
22 The key aspect of our work is to show that we can develop scalable, unique, efficient high-
23 temperature thermal devices by using metal AM. U.S. manufacturing for deep energy technologies
24 in nuclear, fossil, industrial process heat, defense, space, and transportation would have benefited
25 from the outcomes of the project. DOE's SETO office, now a part of Integrated Energy Systems
26 Office, clearly states on its website that it supports development of U.S.-manufactured solar
27 thermal systems for industrial heat, which is exactly what we were demonstrating.

28 5. The grant termination adversely affected the entire four-person research team at UC

1 Davis, as follows:

2 (a) **Jesus Gutierrez Plascencia**, a PhD candidate in Mechanical and Aerospace
3 engineering, was fully financially supported by the grant. He was leading the
4 modeling and optimization of the solar receiver for process heating applications. As
5 a result of the grant termination, Jesus has had to support himself as a Teaching
6 Assistant, significantly slowing down his time to degree completion. Due to this
7 termination, we are having to scale down the scope of Jesus' dissertation and
8 eliminate an exciting component of AI optimization that would have laid the
9 framework for a new generation of thermal devices. Jesus lost the opportunity for
10 continued interaction with industry, national lab, and academic partners on the
11 grant. It has delayed Jesus' graduation by at least one year.

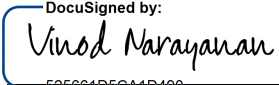
12 (b) **Dr. Erfan Rasouli**, an R&D Engineering Supervisor at UC Davis's Western
13 Cooling Efficiency Center, provided input on project design and CAD modeling of
14 the receiver, and was conducting experimental testing. This work was funded by
15 DOE's grant. As a result of grant termination, Dr. Rasouli had to be reassigned at a
16 higher percentage to other projects. He lost the opportunity to oversee scale-up of
17 the patented technology, which would have resulted in commercialization
18 opportunities.

19 (c) **Aref Aboud**, an R&D III engineer at Western Cooling Efficiency Center
20 and PhD student, was involved in experimental testing of the receiver, and was
21 funded by the grant. After the grant termination, Aref had to be reassigned to other
22 projects at a higher percentage than budgeted. Aref and Dr. Rasouli led the
23 complex on-sun high pressure and temperature testing of the small-scale receiver at
24 UC Davis. Although the testing was successful, they will not have the funding
25 needed to complete the last step and publish an archival article and disseminate
26 results.

27 (d) As faculty PI, I (**Vinod Narayanan**) provided overall guidance and
28 direction for the entire project. I also advised Jesus on his PhD dissertation
research. The research from this project would have enabled team members to
advance research in advancing additive manufacturing for energy applications, and
in adoption of our patented micro pin array solar receiver. In the third phase of the
project, we would have had an opportunity to scale up the technology and
demonstrate it at the National Solar Thermal Test Facility at Sandia National
Laboratory. This capstone demonstration would have been the culmination of more
than a decade of work on the development of the technology, at a scale where
industrial partners would have been interested in discussing adoption. We were in
the midst of detailed planning for this demonstration when we received the
termination notice. The termination has also slowed dissemination of our results to
the scientific community.

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

31 Executed on this 15th day of September 2026, in Davis, California.

32 DocuSigned by:
33 
34 525661D5CA1B496...
35 Vinod Narayanan