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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

**DECLARATION OF IRYNA ZENYUK 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, Iryna Zenyuk, 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 of Chemical and Biomolecular Engineering at the Samueli School
5 of Engineering at UC Irvine, and a researcher on terminated Department of Energy (“DOE”)
6 grants.

7 3. I received letters forwarded to me by prime grantees, each dated in early October
8 2025, which announced that DOE had terminated the following grants: EE0011345, IONOMR
9 Innovations; EE0011326, Proton Energy systems; EE0011315, ACS Industries; and EE0011353,
10 AvCarb, LLC. True and correct copies of the letters announcing termination of those grants, as
11 well as the sub-award letter for the EE0011326 Proton Energy systems grant, are attached to the
12 Declaration of Claudia Polsky In Support of Plaintiffs’ Combined Motion for Summary Judgment
13 and Class Certification (“Polsky Declaration”) at pages 6-19 of Exhibit B.

14 4. DOE’s termination of these grants and the corresponding sub-awards to UC
15 adversely impacted 10 UC scientific researchers other than myself as principal investigator, as set
16 forth below.

17 5. **IONOMR INNOVATIONS.** The aim of this DOE-funded project was to develop
18 PFAS-free materials at scale to be integrated in proton exchange membrane fuels (PEMFCs). UC
19 Irvine’s role as to characterize and use advanced techniques to ensure that the integration of
20 materials is successful, and that the PEMFCs operate at a level comparable to conventional
21 materials.

22 (a) **Dr. Florian Chabot**, a postdoctoral fellow supported by this project, had to
23 leave his position at UC Irvine in the wake of the DOE grant termination, and
24 moved back to France. This cut his postdoctoral position short, and made him lose
the opportunity to gather more x-ray data for contemplated joint publications. The
research team (and the UC system and nation) also lost talent, as he departed the
country.

25 (b) **Dr. Yu Morimoto**, a Senior Researcher with 40 years of experience in
26 PEMFCs and electrochemical systems, was critical personnel in the group. He
27 supervised students and provided key technical insight on many project components.
His position was reduced to a single day per week due to funding constraints
induced by DOE’s grant termination, and now he works fully remotely from Japan.
28 Thus, all of our graduate students on the team lost the opportunity to work closely

1 with someone so experienced.

2 (c) **Robert Anton** is a PhD student who had to pivot his PhD topic as a result
3 of DOE's grant termination. He was a fourth year at the time of the termination and
4 needed to move towards closure on his dissertation, so his timeline on this project
5 terminated prematurely. As a result, one of his PhD chapters is not as complete as it
6 should and would have been. He also lost the opportunity to finish some of the
7 most important experiments, which could have resulted in high-impact
8 publications. These would not only have benefitted his reputation, but would have
9 taught the field how to properly integrate non-PFAS membranes into fuel cells.

10 (d) **Mateusz Wojtaszek** is a PhD student who also had to pivot his PhD topic
11 as a result of Doe's grant termination. He was a second year student, so he had to
12 abruptly change his PhD topic and extend his timeline to dissertation defense. He
13 came to UC Irvine with the specific intent to increase his knowledge of rheology
14 (the branch of materials science that studies the flow and deformation of matter),
15 but now he must work on an industry-funded project that is completely different,
16 compromising his plan of academic study.

17 6. **PROTON ENERGY SYSTEMS.** The UC sub-award on this DOE grant-funded
18 project was to develop alkaline exchange membrane (AEM) water electrolyzers with novel
19 materials for long-duration operation. Proton Energy Systems (recently renamed "NEL
20 Hydrogen") was the prime grantee. The sub-award to UC funded time from and supported
21 research effort by three researchers: Patrick Yang (a PhD student), Jack Lang (a PhD student), and
22 myself as Principal Investigator. The project was halted for months due to DOE's grant
23 termination. As a result:

24 (a) **Patrick Yang's** time had to be distributed among four different small
25 industrial projects that diffused his effort and made his contributions less impactful.
26 He also does not yet have a first-authored publication. Because there is an informal
27 requirement to have three of these for PhD completion, this has delayed his PhD
28 timeframe by 1-2 years.

(b) **Jack Lang** was required to find another funding source and move to
Lawrence Berkeley National Lab as a Doctoral Fellow in an entirely different
capacity. He lost his desired opportunity to continue collaboration with our
industrial partner (Proton). Importantly, as a result of the June 2026 stipulated
judgment in *American International Chemical Engineers, et al. v. Wright*, case 1:26
cv-01063 (attached to Exhibit B of the Polsky Declaration at pages 11-15), the
PROTON/NEL Hydrogen grant and our subaward have recently been reinstated.
Now, Patrick can go back to his original thesis topic and we can try to shorten his
PhD completion: with the right focus, he can produce a first-authored paper.

7. **ACS INDUSTRIES, INC.** This project was to develop U.S.-based manufacturing
of expanded meshes as components for proton exchange membrane water electrolyzers
(PEMWEs). UC Irvine's role was to provide computational design of meshes for ideal geometry.

1 (a) **Nausir Firas**, a PhD student, was working on this project with me, and was
2 financially supported by this award. Nausir is a 4th year PhD student whose work is
3 mostly computational. In year 2, this ACS research team had to provide the UC
4 Irvine team with certain experimental results to validate Nausir's models. The grant
5 termination prevented this. Because Nausir's models are not currently validated
6 with experiments, his work has significantly diminished influence, as the field will
7 question its validity. Nausir's thesis will thus be less impactful, and he will be in a
8 less favorable position for a job search.

9 8. **AVCARB, LLC**. This project aims to develop porous carbon components for
10 proton exchange membrane fuel cells (PEMFCs). UC Irvine's role was to characterize a test novel
11 materials from Avcarb. The UC sub-grant was for research by Dr. Bilal Iskandarani, a
12 Postdoctoral Fellow, and by PhD students Dr. Magnolia Pak and Nergis Mahajar, all working
13 under my supervision as principal investigator.

14 (a) **Dr. Bilal Iskandarani** has a PhD in chemistry and significant background
15 in synthetic synthesis. In the wake of DOE's grant termination, he had to be laid
16 off, preventing him from publishing work he was doing under this project. He
17 instead had to refocus on searching for jobs. He is currently still unemployed, and
18 without a first-author publication from the postdoctoral fellowship, his job
19 prospects are dim. At the same time, the research team lost a member with strong
20 grounding in synthetic synthesis and specific expertise in electrospinning, a skill
21 relevant to this project. Were the grant to be reinstated, Dr. Iskandarani could be
22 reemployed and resume his fellowship.

23 (b) **Dr. Magnolia Pak** was rushed to defend her PhD thesis in the wake of the
24 grant termination due to loss of financial support. She had to take 3 unpaid months
25 to complete her publications (which would normally be taking place under the
26 research assistanceship) even as she was compelled to conduct a hurried job search.
27 She now works for a start-up company on matters unrelated to her PhD topic. She
28 lost the opportunity to search for jobs she is truly passionate about, and thus the
grant termination impacted her placement in the private sector.

(c) **Nergis Mahajar** is a second year PhD student. Her dissertation topic had to
be completely changed in light of the termination of UC sub-award on this DOE
grant. As a result, she lost a year of her PhD work: the first year work will not be
counted as part of her thesis, and her PhD will be prolonged by one or two years.
She also has no publications, which impacts her competitiveness for national
fellowships. The DOE grant termination will thus have long-term adverse
implications on her career.

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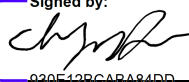
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1 I declare under penalty of perjury under the laws of the State of California and the United
2 States that the foregoing is true and correct.

3 Executed on this 15th day of September 2026, in Irvine, California.

4 Signed by:

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Iryna Zenyuk