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Attorneys for Plaintiffs and the Proposed Class

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

NEETA THAKUR, *et al.*,
Plaintiffs,

v.

DONALD J. TRUMP, *et al.*,

Defendants.

Case No. 3:25-cv-4737

**DECLARATION OF ELIZABETH J.
CABRASER IN SUPPORT OF
UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT
BETWEEN PLAINTIFFS AND
DEFENDANT ENVIRONMENTAL
PROTECTION AGENCY AND
DIRECTION OF NOTICE UNDER
RULE 23(E)**

1 I, Elizabeth J. Cabraser, declare as follows:

2 1. I am an attorney admitted to practice in the state of California. I am a partner of
3 Lieff Cabraser Heimann & Bernstein LLP (“LCHB”). I respectfully submit this declaration in
4 support of Plaintiffs’ Motion for Preliminary Approval of Class Action Settlement Between
5 Plaintiffs and Defendant Environmental Protection Agency and Direction of Notice Under Rule
6 23(e). I have personal knowledge of the facts set forth in this declaration, and could testify
7 competently to them if called upon to do so.

8 2. Attached as **Exhibit A** is a true and correct copy of the Settlement Agreement
9 between Plaintiffs and Defendant Environmental Protection Agency (“EPA”).

10 3. The Settlement Agreement was negotiated in good faith and at arm’s length
11 between the parties over the course of the past few months. During these negotiations, my co-
12 counsel and I vigorously advocated for the best interests of Plaintiffs and the proposed Settlement
13 Class. I respectfully submit that the resulting Settlement Agreement is fair, adequately represents
14 the interests of the Class, and treats all Class members equitably.

15 4. Plaintiffs have likewise developed a reasonable and practicable Notice Plan.

16 5. To determine which University of California (“UC”) researchers are included in
17 the Settlement Class, Plaintiffs worked with EPA to obtain a list of 24 grants affected by the
18 settlement. *See* Settlement Agreement § II.6. For each of these grants, EPA identified a UC
19 researcher who was named as awardee or sub-awardee on the grant. For most of these grants,
20 EPA also identified the email address of the UC researcher.

21 6. For those UC researchers for whom EPA did not provide contact information,
22 Plaintiffs took reasonable measures to find such information, including through web searches and
23 UC networks. Plaintiffs were able to find email addresses for at least one researcher named on
24 each grant.

25 7. Plaintiffs also studied available grant materials and used web resources to identify
26 additional UC researchers who are included in the Settlement Class, as well as their email
27 addresses. With these additions, the Parties have identified a total of 35 known Class Members.

28 8. To effectuate notice, Plaintiffs’ Counsel will send an email (the short-form notice)

1 to all Class Members for whom email addresses are available to inform them of the settlement.
2 The proposed short-form notice (attached as **Exhibit B**) apprises Class Members of the
3 Settlement basics and directs them to a settlement page of the case website:
4 <https://ucresearchergrantterminations.com/EPA-Settlement>.

5 9. The website will include links to the Settlement Agreement and other important
6 case documents, as well as the proposed long-form notice (attached as **Exhibit C**).

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

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10 Executed this 23rd day of September, 2026, in San Francisco.

11
12 /s/ Elizabeth J. Cabraser

13 Elizabeth J. Cabraser
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