

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

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

AMERICAN ASSOCIATION OF
UNIVERSITY PROFESSORS, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity
as President of the United States, et al.,

Defendants.

Case No. 3:25-cv-07864-RFL

**DECLARATION OF RICHARD
BARTLEBAUGH IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY INJUNCTION**

1 I, Richard Bartlebaugh, hereby declare and state as follows:

2 1. I am over the age of 18, of sound mind, and in all respects competent to testify. I make
3 this declaration of my own personal knowledge and would testify to the facts set forth below if called on
4 to do so.

5 2. I am a member of the Union of Professional and Technical Employees (“UPTE”) and I
6 am employed as a Video Producer and Director at UCLA’s Institute for Pure and Applied Mathematics
7 (“IPAM”). As a Video Producer and Director, I am responsible for recording all of the lectures and
8 conference presentations given at IPAM, editing them, and posting them on YouTube for international
9 audiences. I have worked at IPAM and been a member of UPTE since 2021.

10 3. I am aware that IPAM is primarily funded by grants from the National Science
11 Foundation (“NSF”), including a five-year grant that was worth more than \$25 million between 2020
12 and 2025. The NSF first awarded this grant to IPAM in 2000 and subsequently renewed it in 2005, 2010,
13 2015, and 2020. My understanding is that my position is fully funded by this NSF grant.

14 4. I am also aware that, although IPAM’s five-year grant was initially approved for renewal
15 in July 2025, the NSF has not yet awarded the grant renewal and has indicated that it does not intend to
16 do so.

17 5. Because the NSF has not renewed IPAM’s five-year grant, the Institute has been forced
18 to use funds that it received through private donations to pay staff—including myself—and fund its
19 operations. I understand that these funds are only sufficient to sustain IPAM through May 2026, at which
20 point the Institute’s directors will be forced to close the Institute and lay off all its staff including me
21 unless another funding source can be secured.

22 6. IPAM's current funding situation and the potential impact on my employment and the
23 employment of my coworkers have been widely discussed at the Institute informally and in staff
24 meetings, including with the Institute's Director, Dimitri Shlyakhtenko. I am concerned that if NSF does
25 not renew the grant soon, I will lose my job. This will not only eliminate my income but will irreparably
26 harm my professional standing and career trajectory. I accepted a pay cut to come to IPAM because of
27 IPAM's people and the career stability the position offered. I intended to continue working at the Institute
28 for ten years and then retire. If IPAM is closed and my position is eliminated, this will most likely end

1 my career at UCLA, as my role at IPAM is unique and I am not aware of any similar positions at UCLA.
2 If the Institute is forced to close in May 2026, as we expect, my position will be eliminated months
3 before I become pension eligible. In this scenario, my time at IPAM will have represented a four-year
4 and eleven-month career misstep that will be very difficult to recover from in my remaining working
5 years.

6 I declare under penalty of perjury that the foregoing is true and correct.

7

8 Executed this 30th day of October, 2025.

9

10

Richard Vincent Bartlebaugh

11

Richard Bartlebaugh

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28