IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

ALEXANDER KESTENBAUM and STUDENTS AGAINST ANTISEMITISM, INC.,

Plaintiffs,

Case No. 1:24-cv-10092-RGS

v.

PRESIDENT AND FELLOWS OF HARVARD COLLEGE,

Defendant.

DECLARATION OF MEREDITH WEENICK IN SUPPORT OF DEFENDANT'S MOTION TO DISMISS

I, Meredith Weenick, declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, as follows:

1. I am an Executive Vice President at Harvard University. I am familiar with the facts set forth in this declaration. I am competent and willing to testify to the matters contained in this declaration.

2. I submit this declaration in support of the Rule 12(b)(1) portions of Harvard's

Motion to Dismiss Plaintiffs' Amended Complaint.

3. Harvard has engaged in efforts to increase on-campus security since October 7.

As part of these efforts, Harvard has increased the presence of campus security and police officers at locations and events frequented and organized by members of Harvard's Jewish community and in student residences. Harvard also has periodically restricted access to Harvard Yard by closing the gates in an effort to limit outside disruptions.

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4. At the same time, Harvard has established new initiatives to facilitate discussion and to build a more respectful and inclusive community through civil discourse and respectful debate. Starting in the Spring 2024 semester, Harvard began a week-long series of events, forums, convenings, and activities called "Harvard Dialogues" with the goal of modeling and facilitating discussion and respectful debate. Offerings included panels, forums, and events for community members to explore the conflict in the Middle East. Individual schools have adopted their own initiatives to educate community members about civil discourse during difficult conversations and facilitate robust and respectful dialogue.

5. Soon after Harvard Hillel reported antisemitic posts on the messaging platform Sidechat, Harvard administration met with Sidechat's Chief Executive Officer and secured assurance from Sidechat to engage in 24/7 content moderation. Following these conversations, Sidechat has limited access to the Harvard community page of its application to Harvard College students only, who have a unique college.harvard.edu email address. Before this change, the Harvard community page was available to anyone with a harvard.edu email address, a group that includes more than 500,000 people including faculty, staff, graduate students, and alumni. This change took the pool of potential users from 500,000 affiliates to fewer than 10,000 undergraduate students.

6. Harvard is developing, and will implement, educational and training programs for students, faculty and staff that focus on antisemitism both generally and at Harvard specifically. These efforts include organizing new antisemitism-focused educational and training sessions for the more than 200 Harvard faculty and administrators who may be involved in the disciplinary processes at Harvard's individual schools.

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7. Harvard is engaged in investigatory and disciplinary proceedings related to post-October 7 reports of antisemitic incidents.

8. On February 1, 2024, Harvard placed Harvard Faculty of Arts and Sciences employee Gustavo Espada on leave.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Signed this 12th day of April 2024 under the pains and penalties of perjury.

Meredith Weenick <u>/s/</u>