

EXHIBIT 25

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

COMMONWEALTH OF
MASSACHUSETTS, et al.,

Plaintiffs,

v.

NATIONAL INSTITUTES OF HEALTH,
et al.,

Defendants.

Civil Action No. _____

Declaration of EZEMANARI M. OBASI, PhD

I, Ezemenari M. Obasi, PhD, hereby declare:

1. I am the Vice President for Research and Innovation, a position I have held since 2024. As Vice President for Research and Innovation, I have oversight of Wayne State University's Division of Research and Innovation, which includes sponsored programs administration, research integrity, technology commercialization, research and development programming, core facilities, university research centers/institutes, and federal affairs. Prior to holding this position, I was the Associate Vice President for Research and Professor at the University of Houston.
2. As the Vice President for Research and Innovation, I have personal knowledge of the matters set forth below, or have knowledge of the matters based on my review of information and records gathered by my staff.
3. I am providing this declaration to explain certain impacts of National Institutes of Health ("NIH") Notice Number NOT-OD-25-068, *Supplemental Guidance to the 2024 NIH Grants*

Policy Statement: Indirect Cost Rates, which purports to immediately reduce indirect costs payments to 15%.

4. Wayne State University is one of Michigan's public Carnegie Research I universities. Over 80% of grants awarded to Wayne State University during FY2024 were funded by the United States Department of Health and Human Services – 86% of those were awarded funding from the National Institutes of Health. Wayne State University is leading cutting-edge research in cancer biology and treatment, infectious diseases, cardiology, drug discovery, mental health, and population health studies focused on addressing the nation's most pressing health challenges that have a high prevalence in our region. This research is supported by \$80 million from the NIH.
5. Wayne State University has a Negotiated Indirect Cost Rate Agreement ("NICRA") with NIH, effective as of June 6, 2024. The Indirect Cost ("IDC") Rate in Wayne State University's NICRA is 54% for on-campus organized research.
6. Wayne State University's total blended IDC rate for NIH funding is 54% for on-campus organized research.
7. NIH's reduction of Wayne State University's IDC rate[s] will eliminate approximately \$18 million in funding that Wayne State University's uses to support its research programs. The loss of these funds will immediately impact Wayne State University's ability to draw critical funds used to pay expenses associated with facilities operational costs and debt service, research personnel, clinical trials, grants management, regulatory compliance, core research facilities and services, equipment and supplies, to name a few.
8. Wayne State University next anticipates to draw funds on or around February 15, 2025. At that time, the reduced IDC rate will impact Wayne State University's capacity to pay for

research personnel, debt service, facility costs, equipment maintenance agreements, grants management and regulatory functions that are required by notice of award terms and conditions.

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

Executed this 9th day of February, 2025, in Detroit, Michigan.



Ezemenari M. Obasi, PhD

Vice President for Research and Innovation

Wayne State University