

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
SOUTHERN DIVISION**

American Federation of Teachers, *et al.*,

Plaintiffs,

vs.

SCOTT BESSENT, in his official capacity as
Secretary of the Treasury, *et al.*,

Defendants.

Case No. 8:25-cv-00430-DLB

Date: February 19, 2025

Time: 10:00 a.m.

Place: Greenbelt Courthouse

Judge: Hon. Deborah Boardman

**DECLARATION OF XIAONAN APRIL HU
IN SUPPORT OF PLAINTIFFS' REPLY**

I, Xiaonan April Hu, declare as follows:

1. I am over the age of eighteen and legally competent to make this declaration. I am an attorney with Munger, Tolles & Olson LLP in Washington, D.C. I have personal knowledge of the facts set forth in this declaration, and, if called as a witness, I could and would testify competently to the matters set forth herein.

2. Attached hereto as **EXHIBIT A** is a true and correct copy of an article titled “The Government Computing Experts Say They Are Terrified,” written by Charlie Warzel and Ian Bogost, published by the *Atlantic* on February 7, 2025, which was downloaded from https://www.theatlantic.com/technology/archive/2025/02/elon-musk-doge-security/681600/?utm_source=apple_news on February 17, 2025.

3. Attached hereto as **EXHIBIT B** is a true and correct copy of a post published by Elon Musk (@elonmusk) to the social media platform “X” at 11:30 PM, February 3, 2025, which was downloaded from <https://x.com/elonmusk/status/1886633448078475593> on February 17, 2025.

4. Attached hereto as **EXHIBIT C** is a true and correct copy of an article titled “How an Arcane Treasury Department Office Became Ground Zero in the War over Federal Spending,” written by Katelyn Polantz et al., published by *CNN* on February 1, 2025, which was downloaded from <https://www.cnn.com/2025/01/31/politics/doge-treasury-department-federal-spending> on February 17, 2025.

5. Attached hereto as **EXHIBIT D** is a true and correct copy of an article titled “‘Took Away My Hope.’ Federal Workers Say Trump Mass Firings Upended Their Lives,” written by Phillip M. Bailey et al., published by *USA Today* on February 16, 2025, which was

downloaded from <https://www.usatoday.com/story/news/politics/2025/02/16/federal-workers-trump-musk-firings/78728081007> on February 17, 2025.

6. Attached hereto as **EXHIBIT E** is a true and correct copy of an article titled “Hundreds of FAA Employees Are Let Go as Trump’s Mass Layoffs Continue,” written by Aaron Gilchrist and Natasha Korecki, published by *NBC News*, which was downloaded from <https://www.nbcnews.com/politics/doge/hundreds-faa-employees-let-go-trumps-mass-layoffs-continue-rcna192458> on February 17, 2025.

7. Attached hereto as **EXHIBIT F** is a true and correct copy of a post published by Elon Musk (@elonmusk) to the social media platform “X” at 2:11 AM on February 9, 2025, which was downloaded from <https://x.com/elonmusk/status/1888485948121366871?s=43&t=yvJsmV0mu2913uNCsjBAcQ> on February 17, 2025.

8. Attached hereto as **EXHIBIT G** is a true and correct copy of an article titled “Security News this Week: The Official DOGE Website Launch Was a Security Mess,” written by Matt Burgess and Andrew Coutts, published by WIRED on February 15, 2025, which was downloaded from <https://www.wired.com/story/the-official-doge-website-launch-was-a-security-mess> on February 17, 2025.

9. Attached hereto as **EXHIBIT H** is a true and correct copy of an article titled “Elon Musk’s DOGE Posts Classified Data on Its New Website,” written by Jennifer Bendery, published by *HuffPost* on February 14, 2025, which was downloaded from https://www.huffpost.com/entry/elon-musk-doge-posts-classified-data_n_67ae646de4b0513a8d767112 on February 17, 2025.

10. Attached hereto as **EXHIBIT I** is a true and correct copy of an article titled “Musk Associates Given Unfettered Access to Private Data of Government Employees,” written

by Caleb Ecarma and Judd Legum, published by *Popular.Info* on February 3, 2025, which was downloaded from <https://popular.info/p/musk-associates-given-unfettered> on February 17, 2025.

11. Attached hereto as **EXHIBIT J** is a true and correct copy of an article titled “Musk’s DOGE Effort Could Spread Malware, Expose US Systems to Threat Actors,” written by Cynthia Brumfield, published by *CSO* on February 4, 2025, which was downloaded from <https://www.csoonline.com/article/3815925/musks-doge-effort-could-spread-malware-expose-us-systems-to-threat-actors.html> on February 17, 2025.

12. Attached hereto as **EXHIBIT K** is a true and correct copy of an article titled “Young Aides Emerge as Enforcers in Musk’s Broadside Against Government,” written by Theodore Schleifer et al, published by the *New York Times* on February 7, 2025, which was downloaded from <https://www.nytimes.com/2025/02/07/us/politics/musk-doge-aides.html> on February 17, 2025.

13. Attached hereto as **EXHIBIT L** is a true and correct copy of the Brief of Amici Curiae Former Treasury Department Officials in Support of Plaintiffs’ Motion for a Preliminary Injunction, filed in *Alliance for Retired Americans v. Bessent*, No. 25-cv-003130CKK, ECF No. 20-1 (S.D.N.Y.), on February 11, 2025, which was downloaded from the corresponding docket in the Electronic Court Filing System.

Executed this eighteenth day of February, 2025, at Washington, D.C.

/s/ Xiaonan April Hu

Xiaonan April Hu

(signed by filer with permission)