

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

BELLA INGBER, SABRINA MASLAVI,
NEVO YEMINI, AVIGAIL TEILER, and
STUDENTS AGAINST ANTISEMITISM,
INC.,

Plaintiffs,

-against-

NEW YORK UNIVERSITY,

Defendant.

Case No. 23-cv-10023-LAP

Hon. Loretta A. Preska

DECLARATION OF DANIEL L. CANTOR

I, Daniel L. Cantor, declare as follows:

1. I am a partner at O’Melveny & Myers LLP. I represent Defendant New York University (“NYU”) in the above-captioned action. I am familiar with the facts set forth in this declaration.

2. I submit this declaration in support of NYU’s Motion to Dismiss Plaintiffs’ Complaint.

3. Attached as Exhibit A is a true and correct copy of the November 15, 2023 statement of President Linda G. Mills, *NYU to Create Center for the Study of Antisemitism*, found at <https://www.nyu.edu/about/news-publications/news/2023/november/nyu-to-create--center-for-the-study-of-antisemitism-.html>.

4. Attached as Exhibit B is a true and correct copy of the October 25, 2023 message of President Linda G. Mills and Senior Vice President for University Life, *Plans for Student Safety and Well-being*, found at <https://www.nyu.edu/about/leadership-university-administration/office-of-the-president/comms/plans-for-student-safety-and-well-being.html>.

5. Attached as Exhibit C is a true and correct copy of the November 30, 2023 message of President Linda G. Mills and Senior Vice President for University Life Jason Pina, *Executive Summary: Updating our Community on the 10 Point Plan for Student Safety and Well-being*, found at <https://www.nyu.edu/about/leadership-university-administration/office-of-the-president/comms/executive-summary-updating-our-community-on-the-10-point-plan.html>.

6. Attached as Exhibit D is a true and correct copy of the November 1, 2023 message from Jason Pina, Senior Vice President for University Life, *On Our Commitment to Enforcing Our Policies*, found at <https://www.nyu.edu/life/safety-health-wellness/campus-respect/our-commitment-to-enforcing-our-policies.html>. Attached as Exhibit D-1 is a true and correct copy of NYU's Guidance and Expectations on Student Conduct, which was attached to Exhibit D and found at <https://www.nyu.edu/students/student-information-and-resources/student-community-standards/nyu-guidance-expectations-student-conduct.html>.

7. Attached as Exhibit E is a true and correct copy of the October 10, 2023 message of NYU Board Chair Evan Chesler and President Linda G. Mills, *Statement on Israel*, found at <https://www.nyu.edu/about/leadership-university-administration/office-of-the-president/comms/statement-on-israel.html>.

8. Attached as Exhibit F is a true and correct copy of the March 11, 2024 message of President Linda G. Mills and Senior Vice President for University Life Jason Pina, *Further Updates on Promoting Safety and Wellbeing*, found at <https://www.nyu.edu/life/safety-health-wellness/campus-respect/further-updates-on-promoting-safety-and-wellbeing.html>.

9. Attached as Exhibit G is a true and correct copy of the January 23, 2024 message of President Linda G. Mills, *The Semester Ahead*, found at <https://www.nyu.edu/about/leadership-university-administration/office-of-the-president/comms/the-semester-ahead.html>.

10. Attached as Exhibit H is a true and correct copy of the February 2, 2024 message of Jason Pina, Senior Vice President for University Life, *Reinforcing our Expectations for Student Conduct*, found at <https://www.nyu.edu/life/safety-health-wellness/campus-respect/reinforcing-our-expectations-for-student-conduct.html>.

11. Attached as Exhibit I is a true and correct copy of the December 5, 2023 message of Jason Pina, Senior Vice President for University Life, *How We Engage with One Another in a Charged Moment*, found at <https://www.nyu.edu/life/safety-health-wellness/campus-respect/how-we-engage-with-one-another-in-a-charged-moment.html>.

12. Attached as Exhibit J is a true and correct copy of the January 25, 2024 statement of NYU Spokesperson John Beckman regarding Amin Husain, found at <https://www.nyu.edu/about/news-publications/news/2024/january/statement-by-nyu-spokesperson-john-beckman-regarding-amin-husain.html>.

13. Attached as Exhibit K is a true and correct copy of the NYU Student Conduct Policy, found at <https://www.nyu.edu/about/policies-guidelines-compliance/policies-and-guidelines/university-student-conduct-policy.html#Conduct>. Attached as Exhibit K-1 is a true and correct copy of the NYU Student Conduct Procedures, found at <https://www.nyu.edu/students/student-information-and-resources/student-community-standards/studentconductprocedures.html>.

14. Attached as Exhibit L is a true and correct copy of Students Against Antisemitism's ("SAA") Certified Articles of Incorporation.

15. Attached as Exhibit M is a true and correct copy of the October 10, 2023 message of Troy McKenzie, Dean of the NYU School of Law, *Message to the NYU Law Community*, found at <https://www.law.nyu.edu/101023-dean-message>.

16. Attached as Exhibit N is a true and correct copy of the October 11, 2023 message of Troy McKenzie, Dean of the NYU School of Law, and David Tanner, Chair of the NYU Law Board of Trustees, *Statement from NYU Law*, found at <https://www.law.nyu.edu/101123-statement>.

17. Attached as Exhibit O is a true and correct copy of excerpts of the Restrictive Declaration of Large-Scale General Development for the NYU LGSD, dated July 24, 2012.

18. Attached as Exhibit P is a true and correct copy of the October 25, 2023 Statement of NYU Spokesperson John Beckman on Photos of People in Washington Square Park

Holding Offensive Signs, found at <https://www.nyu.edu/about/news-publications/news/2023/october/statement-from-nyu-spokesperson-john-beckman-on-photos-of-people.html>.

19. Attached as Exhibit Q is a true and correct copy of an October 11, 2023 email from Associate Vice President and Dean of Students Rafael Rodriguez to Sabrina Maslavi.

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

Executed on March 18, 2024 at New York, New York.

Dated: March 18, 2024

A handwritten signature in blue ink, appearing to read "Daniel Cantor", written over a horizontal line.

Daniel L. Cantor