

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

PRESIDENT AND FELLOWS OF HARVARD
COLLEGE,

Plaintiff,

v.

DEPARTMENT OF HOMELAND SECURITY,
et al.,

Defendants.

Case No. 1:25-cv-11472-ADB

**DECLARATION OF IAN H. GERSHENGORN IN CONNECTION WITH
PLAINTIFF’S REPLY BRIEF IN SUPPORT OF ITS MOTION FOR A
TEMPORARY RESTRAINING ORDER OR PRELIMINARY INJUNCTION**

I, Ian H. Gershengorn, declare as follows:

1. I am a partner at the law firm of Jenner & Block LLP and represent the President and Fellows of Harvard College (“Harvard” or “Plaintiff”) in this matter. I make this declaration in connection with Plaintiff’s Reply Brief in Support of its Motion for a Temporary Restraining Order or Preliminary Injunction (“Reply Brief”). I have personal knowledge of the contents of this declaration and could testify thereto.

2. This declaration addresses and verifies new exhibits submitted in connection with Plaintiff’s Reply Brief.

3. Attached as **Exhibit A** is a true and correct copy of the Congressional Research Service Report, “Presidential Authority to Suspend Entry of Aliens Under 8 U.S.C. § 1182(f),” also available online at https://www.congress.gov/crs_external_products/LSB/PDF/LSB10458/LSB10458.3.pdf.

4. Attached as **Exhibit B** is a true and correct copy of President Donald J. Trump’s post to the website Truth Social on June 11, 2025, at 8:04 AM EST, also available online at

<https://truthsocial.com/@realDonaldTrump/posts/114664632971715644>.

Executed this 17th day of June 2025, in Washington, DC.

/s/ Ian H. Gershengorn

Ian H. Gershengorn