

# Exhibit E

**AFFIDAVIT OF MŪKOMA NGŪĠ**


I swear under penalty of perjury that the following is true and correct:

1. My name is Mŭkoma Ngŭġ, I am a Professor at Cornell University in the Department of Literatures in English and I reside in Tompkins County, New York.
2. I am the author of numerous non-fiction works, novels and volumes of poetry focusing on the struggle of the people of the African continent for liberation from the centuries-long impact of colonial exploitation. My work is recognized and taught world wide.
3. I have been a close associate and friend of Momodou Taal on campus. I have mentored him, I have helped him as he navigates his academic career, and I've also been someone to whom he has often come for personal advice about the best way to maintain his political and personal integrity while also teaching his courses in an objective way. I have great respect for the way he has stood up for himself and expressed his views about what Israel has done to the population of Palestine. His principled stance against all oppressions (including racial, class, gender, sexuality), is something I admire about him. Momodou Taal is a brilliant student that any professor would be happy to have in class.
4. Since the issuance of the executive orders by Trump, I have been deprived of my right to listen to my colleague's views and opinions. I want to help him develop his scholarship, but this is very hard to do under conditions where I am worried about whether the university or outside forces will monitor and report the things that we say to each other, either in class or otherwise.
5. As a result of the executive orders, Momodou and I have stopped engaging with each other in public in the way we used to. It has been hard for me, as someone who always values what he has to say, to reconcile my desire to keep teaching others with my desire to speak up against his being silenced. I truly wish I could call a public meeting—or even invite professors to dinner to

meet with Momodou and hear his perspective on things—but I can’t. I’m too worried about putting him at risk of deportation, since I’m also associated with criticism of U.S. foreign policy and the policies of the government of Israel. I do also worry about whether my own association in public with Momodou would be seen as “anti-Semitic.” Neither of us has any ill feelings toward our Jewish colleagues and friends who have struggled with us against oppression and state violence.

6. I will say that I am particularly upset that Momodou was forced to miss his book launch. I know that for an author, a book launch is a critical moment in one’s academic and intellectual life. There is something about shaking hands with one’s readers, hearing their thoughts, talking to them in person, signing their copies—Momodou missed out on all of this because he has a legitimate fear of being turned away at the border for no good reason, given that the things he said while residing in the U.S. should be protected by the Constitution.
7. I am afraid of being subjected to criminal prosecution as a result of the second executive order that mentions “anti-Semitism” without a clear definition. I have been critical of multiple governments (African governments, the Israeli government, the US government) and I don’t believe we should conflate criticism of the State with criticism of a State’s citizenry.
8. I believe the legal term is “irreparable harm.” I certainly feel that I’ve been harmed in a way that I can’t repair unless and until I’m able to speak freely and openly with Momodou Taal again.

Signed,



Date: 14<sup>th</sup> March 2025

**AFFIDAVIT OF SRIRAM PARASURAMA**

I swear under penalty of perjury that the following is true and correct:

1. My name is Sriram Parasurama, I am a graduate student at Cornell University and I reside in Tompkins County, New York.
2. I am a second-year Ph.D. student in the School of Integrative Plant Sciences. In 2023, I was awarded the NSF Graduate Research Fellowship to support my research on tree physiology and forest ecology. I have also served as a teaching assistant for the University and I currently maintain a 4.3 cumulative GPA.
3. I was a close associate of Momodou Taal during the demonstrations that protested the Israeli government's actions against the people of Palestine. Since the issuance of the executive orders in question, I have been deprived of my right to listen to my friend's views and insights on what Israel is doing to the people of Palestine. Momodou always brings such a rich historical and cultural analysis to our discussions of the political situation in the US and internationally, but he's been forced to stay quiet since the executive orders came out. We used to meet up all the time, go out for coffee, plan demonstrations, and discuss political issues but, despite our friendship remaining strong, the looming threat of disciplinary action has made our open association infinitely more tenuous.
4. I am not able to interact with Momodou as much as before out of fear of being falsely labeled "anti-Semitic." Additionally, given my own prior prominent involvement in protest activity and subsequent discipline, Momodou is not able to freely associate with me as it might lead officials, either at the university or the government, to believe that he

is engaging in “anti-American” activity. We have been forced to stop seeing each other in public.

5. Having already dealt with criminal allegations, I fear being subjected to further criminal prosecution myself because of the second executive order here. It is unclear what type of speech, such as criticism of the state of Israel, might constitute “anti-Semitism,” as I do not harbor any ill will toward Jewish people at all. In fact, many of those who have been involved in protest activity with me are Jewish, and I consider our unity in opposition to American and Israeli government policy regarding Palestine to be a great strength of our movement. Nevertheless, I worry about interacting with my friends and fellow activists for fear of putting all of us at risk of deportation or criminal prosecution.
6. As a scientist researching the impacts of climate change on our great North American forests, I additionally fear that pressure from these executive orders and my open association with Momodou and the Palestinian cause will negatively impact my ability to carry out my critical research. In order to maintain compliance with these directives, I worry that many of my grant and fellowship sources will revoke current funding or refuse to provide future funding for this vital research I conduct. I wholeheartedly believe in the mission of scientists, the pursuit and defense of knowledge and truth, but am restricted by the demonization of my and Momodou’s political thought.

Signed,



Date: \_\_\_\_\_