

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SHEILA BEDI and LYNN COHN,

Plaintiffs,

v.

THE UNITED STATES HOUSE OF
REPRESENTATIVES COMMITTEE
ON EDUCATION AND
WORKFORCE,

TIM WALBERG, Committee Chair, in his
official capacity, and

BURGESS OWENS, Subcommittee Chair,
in his official capacity,

Defendants,

NORTHWESTERN UNIVERSITY,

MICHAEL SCHILL, Northwestern
University President, in his official
capacity, and

PETER BARRIS, Chair of Northwestern
University Board of Trustees, in his
official capacity,

Nominal Defendants.

Case No. 1:25-cv-3837

**Honorable Elaine E. Bucklo
District Court Judge**

**DEMAND FOR INJUNCTIVE AND
DECLARATORY RELIEF**

DECLARATION OF HEATHER LEWIS DONNELL

1. My name is Heather Lewis Donnell. I am over 18 years of age and a resident of the State of Illinois. I am one of the lead counsel for the Plaintiff Sheila A. Bedi.

2. I provide this declaration in support of Plaintiffs' motion for temporary restraining order pursuant to Federal Rule of Civil Procedure 65(b)(1)(B).

3. Because of the urgency of the relief sought by Plaintiffs, Plaintiffs filed their civil rights complaint today at 3:06 PM Central Time and their motion for entry of a temporary restraining order at 5:27 PM Central Time today. The relief requested is required by 11:00 AM Central Time tomorrow, Thursday, April 10. This narrow window did not allow time to provide notice to the United States Congressional Committee on Education and Workforce and the Subcommittee on Higher Education and Workforce Development, which will not be injured by any delay in the time from when they would otherwise receive the requested materials.

4. I provided notice of this action to Northwestern University, and they were provided with a copy of Plaintiffs' complaint and motion earlier today.

5. This evening, at approximately 8p.m. Central, I have provided notice to counsel identified for the United States Congressional Committee on Education and Workforce—General Counsel Matthew Berry, as well as Assistant United States Attorneys Thomas Walsh and Craig Oswald—by sending the complaint and pleadings via email.

Dated: April 9, 2025

/s/ Heather Lewis Donnell
Heather Lewis Donnell