

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

PRESIDENT AND FELLOWS OF
HARVARD COLLEGE,

Plaintiff,

v.

UNITED STATES DEPARTMENT OF HEALTH
AND HUMAN SERVICES, et al.,

Defendants.

No. 25-cv-11048-ADB

**BRIEF OF MASSACHUSETTS, CALIFORNIA, COLORADO, CONNECTICUT,
DELAWARE, THE DISTRICT OF COLUMBIA, HAWAI‘I, ILLINOIS, MAINE,
MARYLAND, MICHIGAN, MINNESOTA, NEVADA, NEW JERSEY, NEW MEXICO,
NEW YORK, OREGON, RHODE ISLAND, VERMONT, WASHINGTON, AND
WISCONSIN AS AMICI CURIAE IN SUPPORT OF HARVARD’S MOTION FOR
SUMMARY JUDGMENT**

(Leave to file granted on June 6, 2025)

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INTRODUCTION AND INTERESTS OF AMICI

Massachusetts, California, Colorado, Connecticut, Delaware, the District of Columbia, Hawai‘i, Illinois, Maine, Maryland, Michigan, Minnesota, Nevada, New Jersey, New Mexico, New York, Oregon, Rhode Island, Vermont, Washington and Wisconsin (“Amici States”) submit this brief in support of the motion for summary judgment of plaintiff President and Fellows of Harvard College (“Harvard”). Amici States are each home to universities which, like Harvard, pursue research as a fundamental part of their mission. These research universities fuel Amici States’ economies, including by creating jobs, spurring innovation, improving residents’ health, and training the future workforce.

Harvard’s contributions to Massachusetts are a prime example of the significant impact research universities can have. Since its founding in 1636, Harvard has been critical to Massachusetts’s flourishing. Recognizing the significance of the university to the new state and nation, John Adams enshrined support for Harvard in Part II, Chapter V of the Massachusetts Constitution in 1780. Today, Harvard is one of Massachusetts’s largest employers. It also directs billions of dollars to the state’s businesses and organizations and drives countless innovations in medicine and technology. In addition, Harvard frequently collaborates with state and local partners on initiatives that support the local economy.

The federal government’s punitive and unlawful freeze of federal funding to Harvard poses an unprecedented threat to the university. This wholesale attack will have devastating spillover effects on Massachusetts’s economy—as it would on the economy of any Amicus State if its major research universities were targeted in the same way. Beyond threatening current jobs and businesses, such a freeze would halt career development for promising new scientists and debilitate the pipeline for future innovators in Amici States. It would also prevent research into lifesaving medicines and transformative technologies with potential to improve the health and life of Amici

State residents. In short, the federal government’s current attack on research universities is, in multiple respects, an attack on the states themselves.

Amici States respectfully urge the Court to grant Harvard’s motion.

ARGUMENT

I. Research Universities Are Essential to State Economies

Research universities are enormous drivers of economic activity in their states, including as employers. Harvard, for example, is the fifth-largest employer of Massachusetts residents; in fiscal year 2023, the university spent over \$2.5 billion in salaries, wages, and benefits to Massachusetts residents.¹ Similar examples abound in other states: the University of California is California’s third-largest employer, behind only the state and federal governments,² and the University of Washington is the fifth-largest employer in its state.³

But the economic impact of research universities on Amici States extends far beyond employment. In fiscal year 2024, Harvard spent \$1.45 billion at Massachusetts-based businesses on construction, supplies, and services.⁴ As the oldest university in the country, Harvard is also one of the top tourist destinations in the Commonwealth.⁵ Universities that calculate overall

¹ Harvard Univ., *Economic and Social Impact*, <https://community.harvard.edu/economic-impact> (“*Harvard Economic Impact*”); Harvard Univ., *Harvard in Massachusetts: 2023 Facts and Impacts*, https://community.harvard.edu/sites/hwpi.harvard.edu/files/comm/files/2023_facts_impact_final.pdf (“*Harvard Facts and Impacts*”); D. Kohli, *Why a Weaker Harvard Would Mean a Weaker Massachusetts*, *Boston Globe* (May 12, 2025), <https://www.bostonglobe.com/2025/05/12/business/harvard-massachusetts-economy-trump> (“Kohli 2025”).

² Beacon Econ., *The University of California: Systemwide Economic, Fiscal, and Social Impact Analysis* (Jan. 2021), <https://universityofcalifornia.edu/sites/default/files/economic-impact-report-2021.pdf> (“*University of California Impact*”).

³ Parker Strategy Grp., *The Economic Contribution of the University of Washington to the Statewide, Local, and National Economies* at 3 (Oct. 1, 2024), <https://facilities.uw.edu/files/media/psg-uw-economic-impact-report-2024.pdf> (“*U. Washington Contribution*”).

⁴ *Harvard Economic Impact*, *supra* n. 1.

⁵ *Id.*

economic impact within their states routinely report figures in the billions: for example, \$82.1 billion by the University of California in 2018-2019;⁶ \$20.9 billion by the University of Washington in 2023;⁷ \$7.2 billion by the Oregon Health and Science University (OHSU) in 2019;⁸ \$18.9 billion by the University of Illinois in fiscal year 2021;⁹ and \$11.5 billion by the University of Minnesota in 2024.¹⁰

Much of this massive economic output stems, both directly and indirectly, from research activity. Universities inject money into the economy directly through their research. Harvard, for example, spends hundreds of millions of research dollars on local goods and services.¹¹ In 2021, the University of Illinois System spent \$560.4 million on payroll relating to research and \$605.2 million on other research expenditures.¹² Research spending at the University of Nevada, Reno added \$194.1 million to the Nevada economy in fiscal year 2024.¹³ In fiscal year 2015, research

⁶ *University of California Impact*, *supra* n. 2, at 47.

⁷ *U. Washington Contribution*, *supra* n. 3, at 2.

⁸ Pinnacle Economics, Inc., *The Economic and Fiscal Impacts of Oregon Health and Science University, 2019*, at 3 (Nov. 2020), <https://www.ohsu.edu/sites/default/files/2021-04/OHSU%27s%20Economic%20Impact%20on%20Oregon.pdf>.

⁹ Emsi Burning Glass, *Analysis of the Economic Impact and Return on Investment of Education: The Economic Value of the University of Illinois System* at 4 (June 2022), https://www.uillinois.edu/userfiles/Servers/Server_1240/file/UISystem_FY21_EIS_Main.pdf (“*U. Illinois Report*”).

¹⁰ Tripp Umbach, *University of Minnesota Economic and Community Impact Report* at 8 (April 2025), <https://government-relations.umn.edu/sites/government-relations.umn.edu/files/2025-04/UMN%20E%26CI%20Report.pdf> (“*U. Minnesota Report*”).

¹¹ Kohli 2025, *supra* n. 1; *Harvard Facts and Impacts*, *supra* n. 1.

¹² *U. Illinois Report*, *supra* n. 9, at 5.

¹³ Univ. of Nev., Reno, *Research and Innovation*, <https://www.unr.edu/research-innovation> (“*UNR Research and Innovation*”); *see also* Lightcast, *The Economic Value of the University of Nevada, Reno, on Nevada*, https://issuu.com/nevada-wolf-pack/docs/the_economic_value_of_the_university_of_nevada_re.

expenditures at Princeton University in New Jersey totaled \$457.6 million.¹⁴ Research spending by independent colleges and universities in New York State is estimated to have created 19,000 off-campus jobs in fiscal year 2022-2023.¹⁵

Research universities also fuel state economies in other, more indirect ways. Groundbreaking discoveries by university researchers often lead to promising start-ups and early-stage companies that strengthen the economy and drive innovation. Over 160 start-ups have been launched based on research developed at Harvard in the last twelve years alone.¹⁶ As of July 2023, Harvard had 1,116 active technology licenses with 750 industry partners across the country.¹⁷ Over the course of just one year, 57 life sciences start-ups were launched through the Pagliuca Harvard Life Lab, which provides infrastructure for high-potential biotech and life sciences ventures—90 percent of which were based in Massachusetts.¹⁸ More than 60 percent of the 300 start-ups that have come through LabCentral, a Boston-based nonprofit that provides lab space, were connected to either Harvard or the Massachusetts Institute of Technology, another major research university.¹⁹

¹⁴ Princeton Univ., *Education/Innovation/Opportunity: The Economic Impact of Princeton University*, at 7, https://stateaffairs.princeton.edu/sites/g/files/toruqf2336/files/media/princeton_econ_impact_brochure_final.pdf.

¹⁵ Comm'n on Indep. Colleges and Univs. in N.Y., *Economic Impact of New York's Independent Sector, Fiscal Year 2022-23*, <https://www.cicu.org/wp-content/uploads/2024/11/Economic-Impact-of-New-York-States-Independent-Sector-FY2022-23.pdf>.

¹⁶ *Harvard Facts and Impacts*, *supra* n. 1.

¹⁷ *Id.*

¹⁸ *Id.*

¹⁹ K. Putzier & C. Deng, *Boston at Risk of Wealth Spiral as Harvard Fight Ripples Through Economy*, Wall Street Journal (Apr. 20, 2025), <https://www.wsj.com/us-news/education/harvard-funding-wealth-boston-448df045> (“Putzier & Deng”).

Other research universities have similar catalyzing effects. In California, undergraduate alumni from Berkeley and Stanford alone have founded over 2,600 venture-backed companies.²⁰ Research at the University of Minnesota has led to 260 start-ups and has supported farmers, agribusinesses, and rural economies by helping Minnesota remain at the forefront of agricultural innovation.²¹ In fiscal year 2021, start-up and spin-off companies related to the University of Illinois System added \$838 million in income to the Illinois economy.²² In fiscal years 2015 and 2016, research at Rutgers University in New Jersey led to 352 disclosed inventions, 309 patents, 182 license agreements, and 119 start-ups.²³ Such universities also train the next generation of researchers and healthcare workers, providing the education, skills, and experience needed to thrive in complex industries and fields.

Amici States—and the nation as a whole—also benefit from legions of lifesaving medical treatments and solutions to other complex problems developed by research universities. Harvard’s research alone has produced countless new treatments for disease, including cutting-edge cancer immunotherapy treatments,²⁴ a revolutionary treatment for obesity,²⁵ and innovations in organ

²⁰ Univ. of Cal., *UC Berkeley Is Top University in Number of Companies Founded by Undergraduate Alumni* (Sept. 14, 2023), <https://www.universityofcalifornia.edu/news/uc-berkeley-top-university-number-companies-founded-undergraduate-alumni>.

²¹ *U. Minnesota Report*, *supra* n. 10, at 6.

²² *U. Illinois Report*, *supra* n. 9, at 5.

²³ Rutgers Univ., *Rutgers Grows the Garden State: Our Impact on the Economy of New Jersey*, at 12, <https://governmentrelations.rutgers.edu/sites/default/files/2022-04/rutgers-economic-impact-single-pagesR.pdf>.

²⁴ E. Pesheva, *To Boost Cancer Immunotherapy’s Fighting Power, Look to the Gut*, Harvard Med. Sch. (May 3, 2023), <https://hms.harvard.edu/news/boost-cancer-immunotherapys-fighting-power-look-gut>.

²⁵ Harvard Med. Sch., *Harvard Medical School Researcher Wins 2024 Lasker Award for Work That Led to GLP-1 Therapies* (Sept. 19, 2024), <https://hms.harvard.edu/news/harvard-medical-school-researcher-wins-2024-lasker-award-work-led-glp-1-therapies>.

transplantation.²⁶ Many of California's leading industries grew from University of California research, including biotechnology, computing, semiconductors, telecommunications, and agriculture.²⁷ At the University of Minnesota, research is leading to the development of drought-resistant crops, sustainable farming, and renewable energy solutions.²⁸ Research at Princeton University in New Jersey produced a transformational lung cancer drug.²⁹ Any attempt to catalog innovations developed through university research would fill innumerable pages, but the fact that such research improves and lengthens the lives of Amici State residents is indisputable.

Finally, residents of Amici States benefit from initiatives led by research universities with state and local partners to address local issues, educate community residents, and fuel spending in the local economy. Harvard, for example, leads workforce training and education programs for the Greater Boston and Massachusetts communities, funds nonprofits, partners to build affordable housing, and provides its expertise to local governments across the Commonwealth.³⁰ Research universities in other Amici States support food pantries, access to rural medicine, workforce development trainings, and countless other initiatives that benefit state economies.³¹

²⁶ Harvard Med. Sch., *In a First, Genetically Edited Pig Kidney Is Transplanted Into Human* (Mar. 21, 2024), <https://hms.harvard.edu/news/first-genetically-edited-pig-kidney-transplanted-human>.

²⁷ *University of California Impact*, *supra* n. 2, at 64.

²⁸ *U. Minnesota Report*, *supra* n. 10, at 6.

²⁹ L. Fuller-Wright, *The Partnership That Drives America's Leadership in Medical Discovery: How It Works and What's at Stake*, Princeton Univ. (Feb. 18, 2025), <https://research.princeton.edu/news/partnership-drives-america%E2%80%99s-leadership-medical-discovery-how-it-works-and-what%E2%80%99s-stake>.

³⁰ Harvard Univ., *Harvard University's Community Engagement in the City of Boston: JULY 1, 2022–JUNE 30, 2023*, <https://www.boston.gov/sites/default/files/file/2025/04/FY24%20Harvard%20University%20Community%20Benefits%20Report.pdf>.

³¹ *See, e.g., U. Illinois Report*, *supra* n. 9, at 10.

In sum, it is difficult to overstate the importance that research universities like Harvard have on the economies of their states and the well-being of state residents.

II. Attacks on Research Universities Would Have Devastating Impacts on Amici States

Given the importance of research universities to state economies, an across-the-board funding freeze like the one at issue here would result in massive downstream consequences.³²

First, such a freeze would affect the training and opportunities available to the next generation of researchers. In many cases, federal funding pays the salaries of researchers and lab technicians. Without that funding, these employees would lose their jobs, or the university would need to pull funds (if available) from other parts of the university, diminishing its ability to complete its educational mission. Indeed, facing federal funding cuts, many universities have already cut the number of spots available in doctoral programs,³³ impacting the pipeline of future researchers to advance science, industry, and public health.

Second, a federal funding freeze risks a “brain drain,” whereby the most talented researchers are lured away from American research universities to institutions in countries where funding streams are more stable.³⁴ Some countries have already seized the opportunity to recruit

³² Putzier & Deng, *supra* n. 19.

³³ W. Mao & V. Paulus, *With Federal Funds Stalled, Two Harvard School of Public Health Graduate Programs Reduce Admissions*, Harvard Crimson (Mar. 12, 2025), <https://www.thecrimson.com/article/2025/3/11/hsph-biostatistics-admissions-reductions>; C. Thompson, H. Hollingsworth & M. Seminera *Young Scientists See Career Pathways Vanish as Schools Adapt to Federal Funding Cuts*, AP News (Mar. 16, 2025), <https://apnews.com/young-scientists-see-career-pathways-vanish-as-schools-adapt-to-federal-funding-cuts-000001959e23d0e3adddd3fa7cc0000>.

³⁴ H. Burns & M. Damiano, *Healey Sounds Alarm Over Foreign Recruiting of Mass. Scientists*, Boston Globe (Mar. 20, 2025), <https://www.bostonglobe.com/2025/03/19/metro/china-foreign-governments-recruit-massachusetts-scientists-trump-cuts>; C. Serres & J.E. Parker, *Funding is drying up, and so are career options. Some budding scientists are debating abandoning their research*, Boston Globe (May 27, 2025), <https://www.bostonglobe.com/2025/05/27/metro/trump-administration-harvard-nih>.

promising scientists.³⁵ The economies of Amici States would be significantly harmed by the loss of top scientific talent and the resulting loss of competitive advantage in key subject areas such as artificial intelligence, biomedical industries, and defense research.³⁶

Third, loss of research funding, and of researchers, would diminish intellectual property development and cause fewer new companies to be founded in Amici States. In Massachusetts, for example, biotechnology entrepreneurs have described federal funding as critical to the launch of their companies, which frequently license technology developed at universities and rely on the universities for a skilled workforce.³⁷

Fourth, a funding freeze would impact the vast ecosystem of businesses in Amici States that support university operations, and their neighboring communities. Local life-sciences companies that supply research materials describe the Massachusetts economy as hinging upon the strength of the biotechnology industry, in which Harvard is a central player.³⁸ In fact, shares for certain Massachusetts companies that supply research materials to academic institutions have already plummeted since the initial research cuts at Harvard.³⁹ Similarly, in California, one company paused development of advanced instruments intended for external researchers and laid off 15 percent of its staff because “government funding cuts have constrained the budgets of

³⁵ *Id.*

³⁶ *Id.*

³⁷ Putzier & Deng, *supra* n. 19.

³⁸ Kohli 2025, *supra* n. 1.

³⁹ *Id.*

academic institutions.”⁴⁰ More broadly, local businesses garner significant income from students, researchers, and tourists visiting universities.⁴¹

Fifth, a funding freeze would likely cause a research university to pause or decrease its collaborations with state and local partners on regional initiatives that fuel spending. Harvard has already made clear that it may have to “reduce, delay, or eliminate much of this activity” because of the federal government’s actions. Amended Complaint ¶ 102 (ECF No. 59). Neighbors in Cambridge and Allston have described Harvard as a “true community partner” and warned that the loss of its support would harm Harvard’s collaborations with the community to develop surrounding neighborhoods.⁴²

Sixth, attacks on research universities could prevent the next lifesaving treatments or other transformational innovations from being developed. At Harvard, the federal government abruptly terminated funding for multi-year advanced research studies into, for example, radiation

⁴⁰ J. Waldron, *Eikon Blames US Funding Cuts for 15% Staff Reduction Centered on Research Tools Business*, Fierce Biotech (May 22, 2025), <https://www.fiercebiotech.com/biotech/eikon-blames-us-funding-cuts-15-layoffs-centered-research-tools-business>.

⁴¹ See, e.g., *Harvard Facts and Impacts*, *supra* n. 1; Kohli 2025, *supra* n. 1.

⁴² Kohli 2025, *supra* n. 1.

exposure,⁴³ ALS,⁴⁴ antibiotic resistant bacteria,⁴⁵ and breast cancer.⁴⁶ When long-term scientific studies are stopped midway, their partial results often lose validity, wasting the valuable resources already expended and delaying scientific progress.⁴⁷ It is no exaggeration to say that attacks on research universities could lead directly to significant loss of life in Amici States and beyond.⁴⁸

CONCLUSION

For the foregoing reasons, the Amici States respectfully request that the Court grant Harvard's motion for summary judgment.

⁴³ L. Mineo, *Freezing Funding Halts Medical, Engineering, and Scientific Research*, Harvard Gazette (Apr. 21, 2025), <https://news.harvard.edu/gazette/story/2025/04/freezing-funding-halts-medical-engineering-and-scientific-research> ("Mineo").

⁴⁴ S. Sundar, *Scores of Researchers Receive Termination Notices After Federal Government Cuts Most Grants to Harvard*, Harvard Crimson (May 17, 2025), <https://www.thecrimson.com/article/2025/5/17/research-termination-notices>; C. Serres & K. Lazar, *'A Bloodbath': Trump Administration Moves to Terminate Hundreds of Federal Grants at Harvard*, Boston Globe (May 17, 2025), <https://www.bostonglobe.com/2025/05/16/metro/harvard-trump-administration-grant-terminations>.

⁴⁵ M. Bebinger, *Feds Yank Funds from Harvard Breast Cancer, Fertility, Antibiotics Research*, WBUR (May 20, 2025), <https://www.wbur.org/news/2025/05/16/harvard-medical-research-trump-2-7-billion-cuts>.

⁴⁶ *Id.*

⁴⁷ *See, e.g.*, Mineo, *supra* n. 43.

⁴⁸ *See, e.g.*, D. Fuller & P. Mitchell, *Cuts to Science Research Funding Cut American Lives Short*, Ohio Capital Journal (Mar. 31, 2025), <https://ohiocapitaljournal.com/2025/03/31/cuts-to-science-research-funding-cut-american-lives-short>.

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