

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

AMERICAN COUNCIL OF LEARNED  
SOCIETIES, *et al.*,

*Plaintiffs,*

v.

ADAM WOLFSON, in his official  
capacity as Acting Chairman of the  
National Endowment for the Humanities,  
*et al.*,

Defendants.

Case No. 1:25-cv-03657

Consolidated with No. 1:25-cv-03923

**DECLARATION OF MATTIE BURKERT**

I, Mattie Burkert, declare as follows:

1. I, Mattie Burkert, am an Associate Professor of English at the University of Oregon (UO or the “University”). I received my Ph.D. in English from the University of Wisconsin-Madison in 2016 and taught at Utah State University for four years before joining the faculty at UO as a specialist in Digital Humanities. I currently serve as the Director of the Minor in Digital Humanities and am a faculty affiliate of the graduate New Media and Culture Certificate.

2. The University of Oregon is a member of the American Council of Learned Societies (ACLS) and an institutional member of the Modern Language Association (MLA).

3. I am an individual member of the Modern Language Association (MLA).

4. As was outlined in my prior declaration in this case, the NEH has been a key funder of my scholarly career to date, especially through the programs associated with the Office of Digital Humanities (ODH). NEH-sponsored workshops and grants have enabled me

and my collaborators to develop innovative research methods, create classroom-ready teaching materials, foster campus-community partnerships, and produce open-access information resources that benefit the wider public.

5. My prior declaration also described my current project, the London Stage Database, an online resource that documents the history of British theater. This project has twice received funding through the NEH's competitive Digital Humanities Advancement Grants program. From January 2018 through July 2019, I was Principal Investigator and Project Director for National Endowment of the Humanities grant to Utah State University (Award HAA-258717-18), which funded the initial development of the database and the launch of the public-facing website. In September 2024, the University of Oregon received a three-year, \$350,000 grant from the NEH, "Extending the London Stage Database" (Award HAA-300527-24). This grant was intended to support three years of work upgrading, expanding, and sustaining a publicly available database of historical theater records that are otherwise unattainable due to paywalls or because they are maintained in a way that makes it difficult for non-experts to navigate them. In addition to the project itself, the grant was explicitly intended to help build an infrastructure at the University of Oregon for similar digital projects that may be smaller or may not have external funding.

6. In April 2025, my grant from NEH was abruptly canceled. In my previous declaration, I outlined anticipated harms from the termination, many of which have been realized.

7. Since the termination of my NEH grant, I lost my anticipated pay for research effort in summer 2025. My graduate research assistant lost her planned paid position working on the database in summer 2025 and was forced to find alternate employment. I had to

terminate a contract with an outside specialized technical consultant, who has now lost a large majority of the income she expected to earn from three planned deliverables over two years.

8. In summer 2025, the London Stage Database—like many open-access informational websites—experienced security threats that significantly impacted site stability, taking the website down several times a day. To stabilize the website, I had to set up new security services, using my personal credit card for account creation because I did not have access to grant funds that had been allocated for critical infrastructure maintenance. I spent significant, unpaid time addressing this issue, as did my campus collaborators.

9. I was unable to hire a graduate researcher for the 2025-2026 academic year to act as data manager for the project. I was unable to hire undergraduate research assistants for Fall 2025. I personally performed necessary data management tasks and maintained our communications and social media accounts at a baseline level, but these and other project activities, including the collection of new data, were radically curtailed in the absence of student workers.

10. I applied for and was awarded a smaller internal grant through UO's Research Resilience initiative. The Grant Termination Award and associated support from the Department of English, the College of Arts and Sciences, the Provost's Office, the Office of the Vice President for Research and Innovation, UO Libraries, and UO Central Information Services provides for the resumption of a limited number of key, high-impact activities. These include hiring an undergraduate research assistant in Winter and Spring 2026, hiring a graduate researcher in academic year 2026-2027, supplementing my reduced sabbatical pay in academic year 2026-2027 to bring my salary up to its usual level, and resourcing core

computing infrastructure and support through UO Central IT. The internal award represents an extraordinary collaboration between campus units, each of which is facing unique financial and operational pressures and has provided as much support as possible for this project under the circumstances.

11. However, the internal award is significantly smaller than the terminated grant; it cannot make the project whole or enable the full range of scholarly outcomes the original funding would have enabled. For example, the internal award does not provide summer pay for myself or for student researchers. It does not pay for me to hire an undergraduate researcher in academic year 2026-2027. It does not allow me to re-hire the outside consultant whose contract was canceled. It does not provide for me, my students, or my collaborators to travel to archives and conferences as originally planned. While the internal grant provides funding for IT to perform critical maintenance and operations work, funds for development of new features are significantly reduced compared to the original grant, necessitating a reduction in scope. The internal grant does not pay at all for the effort of my Library colleagues, who can now contribute to the project only insofar as it aligns with the core functions outlined in their job descriptions.

12. As I explained in my previous declaration, the loss of critical momentum on this project will have lasting impacts on my research program, which is the primary basis for my post-tenure performance reviews, merit pay raises, and eligibility for promotion to Full Professor. It also has long-term consequences for my collaborators, my students, the University of Oregon, and the many users around the country and world who rely on the London Stage Database as a critical research resource.

13. If the NEH were to restore my grant, I would be able to hire an undergraduate research assistant for next year; re-hire the specialized technical consultant; travel to archives to gather and digitize new primary sources for the database; bring students to professional conferences to present research findings; and pay for team members to continue working on the project through the summers. Summer pay for students and faculty alike is important because this time period represents an essential opportunity to make accelerated progress on research projects outside the busy academic year.

14. The NEH has long been a leading funder of digital humanities scholarship in the United States. Without strong NEH support, humanities scholars in this country will find it significantly harder to innovate in our fields; to experiment with, leverage, and contribute to the development of emerging technologies; to promote public access to vital historical and cultural materials; and to recruit and train the next generation of humanities scholars in leading-edge research methods. Restoring the terminated grants would not only recommit funds to my own and other projects selected through highly competitive processes for their potential to advance knowledge and provide benefit to the American people; it would also renew our collective hope for the future of humanities research, which Congress has long recognized as a public good.

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

Executed on March 3, 2026, in Eugene, OR.



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Mattie Burkert  
Associate Professor of English  
University of Oregon