

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

AMERICAN COUNCIL OF LEARNED
SOCIETIES, et al.,

Plaintiffs,
v.

MICHAEL MCDONALD, in his official
capacity as Acting Chairman of the National
Endowment of the Humanities, et al.,

Defendants.

Case No. 1:25-cv-03657

DECLARATION OF LAURA MORREALE

1. I am an independent scholar with a background in medieval Italian history, the history of the French language, medieval digital humanities, and project management/administration. I have co-written and edited several book-length works including *A Crusader's Death and Life in Acre*, *Digital Medieval Studies—Practice and Preservation*, and *The French of Outremer*. I have also created or co-created several digital projects, including *Middle Ages for Educators*, the *French of Italy* and *French of Outremer* websites and associated web-based studies, such as the *Oxford Outremer Map* and *Exploring Place in the French of Italy*. I have a doctorate in History from Fordham University, and I am an affiliate of the History Department at Harvard University.
2. I have been a member of the American Historical Association since October 2017.
3. I was part of a team that received an NEH grant in August 2023 to complete work on the *La sfera* digital edition for the first year of the planned two-year project.

4. The NEH grant that was terminated was the second one-year grant we received to prepare a digital edition and translation of *La sfera* over a two-year period. When we won the grant in 2023-2024, the monies were awarded for one year only, not for the two needed to complete all the work for the project. Therefore, shortly after we received the first-year grant, we had to re-apply to the NEH to secure funding for the second year (that is, for 2024-2025) even as we were making progress during year one. Naturally, this required us to move forward with our research, editing, and data collection while also writing the grant for year two and compiling the dossier (with a full narrative, workplan, budgets, team member resumés, etc.) to submit to the NEH, which was a time-consuming effort and which might have been used to advance our research on this or other projects.

5. In August 2024, NEH awarded a \$99,599 grant to support the second year needed to prepare for digital publication a critical edition and translation, from Italian to English, of *La sfera* (The Globe), written by Gregorio Dati (1362-1435). The project's goal was to complete an open-access multimedia edition of *La sfera*, an early-fifteenth-century textbook in poetic form designed to introduce the merchants-in-training of late medieval Italy to the cosmos, the natural world, and Mediterranean geography.

6. Against the modern misconception that medieval people believed the world was flat, *La sfera* articulates European perspectives on the world in the period before the "Age of Exploration." The project was going to integrate a new critical edition of Dati's treatise, an annotated English translation, integrated IIF manuscript images, and a cartographic interface to visualize geospatial data, along with materials to contextualize Dati's work. The digital edition would showcase the richness of Dati's treatise and manuscripts by combining text, images, and

maps in ways that a static print edition cannot, crystallizing a crucial transitional moment between the Middle Ages and the Renaissance.

7. Since this project was the direct result of an online crowdsourcing project *on La sfera* that I initiated in 2020, my role in the project involved overall conceptual design, project management, and incorporating public-facing elements into our work. The public-facing components of the project included a crowd-sourcing element based on my initial work in 2020, as well as pedagogical elements that relied upon the transcriptions produced in the first stages of the *La sfera* project that were completed before the initial NEH grant was awarded.

8. Since receiving the year two award in August 2024, the *La sfera* project team conducted weekly meetings, which I organized and managed, to populate the website with our Italian transcription of the poem, with the first-ever translation of *La sfera* into English, and with an accompanying geospatial section. I worked especially to plan and execute how users would interact with the Italian and English texts (including inserting extensive textual annotations) and the manuscript images, as well as writing and editing the materials that would contextualize the work for users. Website materials included an introduction to the project, the poem, the gazetteer and cartographic elements, the bibliography, and a listing of the talks, publications, and public-facing programs team members have crafted based on the work done for *La sfera* project. Due to my many years working with digital humanities projects, my work also involved devising innovative ways to transfer the ideas presented in the medieval poem (such as the place names in the text that employed variable orthographies or multiple names for identical locales) into information that could be understood by computers in a data-oriented, digital format. Aside from data modelling, site design, and content creation, I planned and participated in three events during the period of the cancelled grant that were geared towards a dissemination of project

findings to an audience beyond our small team: these included an event geared towards the general public (a seminar/public lecture on medieval and Renaissance maps and mapping in December 2024); a second event targeting K-12 instructors (a teacher-training workshop in March, 2025) to integrate medieval maps, mapping, and *La sfera* transcription practices into their pedagogy; and an online event for members of the Medieval Academy of America to share our initial research findings, announce to colleagues what our anticipated final product would be, and suggest how our work could support their own research efforts.

9. On April 2, 2025, I learned that the grant for the *La Sfera Project* was being terminated. The termination notification did not include the name of the grant or any information about the grant. It appeared to be a form letter.

10. The notification did not include any specific information about why the grant was terminated or how to appeal the decision.

11. I had to take several steps upon learning that the grant was cancelled, including assessing the project's progress and status and determining how much of the work that had been completed could be either salvaged or re-purposed. I also had to schedule and participate in multiple team meetings to discuss the project status and potential next steps. Since our team's developer was instructed to stop work immediately and team members would no longer be paid for their time, I had to decide immediately whether I wanted to continue to work for free on this nearly-completed project or to start looking for other paid employment so as not to miss out on other opportunities.

12. As a result of this termination, since I am an independent scholar and rely upon a collection of projects for my annual income, I am now facing a considerable shortfall in my yearly earnings. However, as a non-university-based scholar with few other means to endorse my

work, both the reputational harm of working for two full years with no final end-product and the damages of lost opportunities are real, albeit not easily quantifiable nor remedied by money alone. The loss of this grant and the inability to complete the project means I will not have the completed, NEH-endorsed product that was promised to the audiences I spoke to (including my medievalist colleagues, the K-12 educators I addressed, and the interested members of the general public to whom the project was presented), nor will I be able to add it to my work experience, which would represent a significant and identifiable accomplishment among both my peers and other audiences. Additionally, in accepting the NEH grant and its conditions as they were represented in writing to me, I was also forgoing other professional opportunities I might have been offered during this time. The lack of a product from two years' worth of work also puts into peril the affiliations I have with other universities and institutions, who base their ongoing connections to me on my status as an active scholar who continues to produce research, writing, and other forms of scholarship. By cancelling this award and effectively negating the reputational benefits I would have received in completing the project, my other professional relationships are also put in peril. In sum, I relied upon the terms put forth in the NEH grant offer to my own professional detriment.

13. Moreover, since submitting my first declaration on May 5, 2025, I have suffered additional harm stemming from the revocation of the NEH grant previously awarded to me and my co-principal investigators for the *La sfera* project. This harm arose from efforts to recoup some benefit from the substantial time, labor, and expertise I had already invested in the project.

14. As a direct result of the revocation of grant funds, the project could no longer maintain its partnership with George Mason University for development and project management. All development activities ceased as of April 30, 2025, when the NEH grant no

longer covered the developer's salary. The abrupt loss of developer support caused significant disruption and materially impeded the project's progress.

15. Since we were forced to secure new development partners, we then undertook identifying, vetting, and interviewing possible candidates and ultimately hiring an external firm. To pay for outside developers, my co-PIs and I implemented a strategy to identify opportunities and obtain monies from public and private funding bodies through grant-writing and other means. Although we were able to secure limited project-specific funding to complete a portion of the planned work, my colleagues have also been required to use their personal research accounts to cover project expenses, thereby diverting resources from their own research agendas. The time spent locating new partners and raising replacement funds displaced time I otherwise would have devoted to alternative professional opportunities.

16. The loss of NEH funding and associated technical support also required relocating the project from its original hosting site at George Mason University—hosting that had been included under the original grant—to an externally hosted platform that carries annual maintenance and hosting fees. This shift imposed additional ongoing financial burdens, jeopardized the project's long-term sustainability, and resulted in the loss of association with a well-established center for digital scholarship. Continued preservation of the project and its reputation now depends on our ability to secure recurring funds and on team members dedicating additional time to acquire new technical skills necessary to maintain the project on a different platform. Time that would have been spent on income-generating or career-advancing work has instead been devoted to responsibilities that were already contemplated and funded under the original NEH award. These harms are therefore both financial and opportunity based.

17. Prior to the grant's revocation, I had been accepted to present our final project and to cultivate scholarly interest in our findings at a conference in Bergamo, Italy in June 2025. Because the NEH funding for travel had been withdrawn, I personally covered all associated expenses and therefore incurred further financial damages. Moreover, due to the pause in project work following the loss of funding, I was unable to present the completed project as originally intended. This resulted in a lost professional opportunity to disseminate our findings and caused significant harm to my scholarly reputation.

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

Executed on March 5, 2026, in Washington, DC.

Laura Morreale

/s/

Laura K. Morreale, PhD