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9 Attorneys for Defendants  
10 MILLS COLLEGE, DR. ELIZABETH HILLMAN, KATHLEEN  
SANBORN, MARIA CAMMARATA, RENEE JADUSHLEVER,  
11 ERIC ROBERTS, DR. MARILYN SCHUSTER, ELIZABETH  
12 PARKER, OPHELIA BASGAL, AND DR. KAREN MAY

13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

14 **COUNTY OF ALAMEDA**

15 DR. VIJI NAKKA-CAMMAUF, *et al.*,

16 Plaintiffs,

17 v.

18 DR. ELIZABETH HILLMAN, *et al.*,

19 Defendants,

20 -and-

21 MILLS COLLEGE, a California nonprofit  
22 public benefit corporation,

23 Nominal Defendant.  
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Case No. RG21101875

Honorable Stephen M. Pulido, Dept. 517

**DECLARATION OF DR. ADRIENNE  
FOSTER IN SUPPORT OF OPPOSITION  
TO EX PARTE APPLICATION FOR:**

- (1) TEMPORARY RESTRAINING  
ORDER;**
- (2) ORDER TO SHOW CAUSE RE:  
CONTEMPT FOR  
NONCOMPLIANCE WITH  
PRELIMINARY INJUNCTION;**
- (3) ORDER TO SHOW CAUSE RE  
FURTHER AFFIRMATIVE RELIEF  
AND PRELIMINARY  
INJUNCTION; MEMORANDUM  
OF POINTS AND AUTHORITIES**

DATE: September 9, 2021

TIME: 2:30 p.m.

**DECLARATION OF DR. ADRIENNE FOSTER**

I, Dr. Adrienne Foster, declare and state as follows:

1. The facts set forth herein are true of my own personal knowledge and, if called upon to testify thereto, I could and would competently do so.

2. I submit this declaration in support of Defendants’ Opposition to Plaintiff Viji Nakka-Cammauf’s *Ex Parte* Application for Temporary Restraining Order; Order to Show Cause re: Contempt for Noncompliance with Preliminary Injunction; and Order to Show Cause re: Further Affirmative Relief and Preliminary Injunction (the “Further TRO Application”).

3. I currently serve as a Trustee on the Board of Trustees (the “Board”) of Mills College (“Mills” or the “College”).

4. Based on the ample financial information I have received as a Trustee, it is clear to me that a strategic transaction with Northeastern University (“Northeastern”) is in the best interest of the College and is necessary to preserve and continue the College’s operations and mission.

5. Without the financial support that the alliance with Northeastern will provide, I anticipate the Board will begin planning to implement a teach-out plan and resulting closure of the College, because we cannot assure our students, faculty and staff that the College will remain open throughout this academic year.

6. I anticipate that additional information regarding final negotiations with Northeastern will be provided by the College administration and counsel to the Board, as is customary and consistent with our practice, to support an eventual Board vote on approving a final transaction with Northeastern.

7. I am confident in the Board’s deliberative process, and I am prepared to cast an informed vote.

8. For the future of the College and its mission, and considering the interests of its many constituents—including students, faculty, staff, alumnae and the Oakland community—I believe it is critical that the Board votes on the final transaction without further delay.

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I declare under penalty of perjury under the laws of the State of California that the foregoing  
is true and correct. Executed on September 7, 2021 at Los Angeles, California

Adrienne Foster