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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 DEBORAH WOOD 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.

1 **DECLARATION OF DEBORAH WOOD**

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3 I, Deborah Wood, declare and state as follows:

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

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

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

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

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

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

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

25 8. For the future of the College and its mission, and considering the interests of its
26 many constituents—including students, faculty, staff, alumnae and the Oakland community—I
27 believe it is critical that the Board votes on the a 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.



DEBORAH WOOD