

**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 for the Humanities, et al.,

Defendants.

Case No. 1:25-cv-03657

DECLARATION OF CHRISTINE WENC

I, Christine Wenc, declare as follows:

1. I am a resident of the State of Wisconsin. I am over the age of 18 and have personal knowledge of all the facts stated herein, except to those matters stated upon information and belief; as to those matters, I believe them to be true. If called as a witness, I could and would testify competently to the matters set forth below.

2. I am currently employed by the University of Wisconsin-Madison (UW-Madison) as Editor/Writer in the School of Education's Wisconsin Center for Education Research (WCER). I am also an independent public historian who has played central roles in major history of science, medicine, and technology projects for universities and libraries, and I am an independent nonfiction author and editor.

3. UW-Madison is both an associate member and a research university consortium member of the American Council of Learned Societies. It has been an associate member since 1992, with its current associate membership running through Fall 2025, and it has been a

research university consortium member since assessment year 2019-2020, with its current research consortium membership running through assessment year 2030-2031. UW-Madison is also a member of the American Historical Association.

4. Through Funding Opportunity Number 20231011-DOI-DOC, NEH invited applications for Dangers and Opportunities of Technology: Perspectives From the Humanities. UW–Madison submitted a proposal to NEH, entitled *How Life Support Technology Changed American Death*, proposing to research and write a book of history. The project tells the story of how life support technology—especially the ventilator—was developed in the 1950s–1970s and came to play a central role in both the understanding and experience of death in the United States. The project takes the form of a book manuscript focused on the history of the ventilator and its use in the intensive care unit between 1950 and 2000, telling the story of how both medicine and society created, responded to, and interacted with this technology. The project also looks at how two early 20th-century devices—the pulmotor resuscitation machine in the 1910s–20s and the iron lung in the 1930s–50s—played foundational roles in this history, not only in technological development but in the broader medical, cultural, and popular discourse about the use of technology at the end of life. Ambiguities and ethical dilemmas about the use and overuse of technology at the end of life has been a difficult and stubborn problem since the ventilator was developed and became commonly used in hospitals in the 1950s and 1960s. Hundreds of sociological and ethical studies and reports over the years show that this is not how doctors and nurses want to practice medicine, nor how patients and their families want to experience it. Yet even deliberate attempts to alter this seemingly technologically deterministic path have failed; by the 1990s one study found that around 20% of American deaths now occurred as a result of “pulling the plug”—the elective removal of life support after the arrival of far-flung loved ones.

This is a new modern death ritual and a manner of death that did not exist 30 years earlier. My hope is that a *history* of this technology—one which places the ventilator, medicine, and death in a deeper societal context—may provide a new path out of this difficult problem. As death is a universal human experience, I believe this project potentially has great value. To my knowledge there has been no history of this technology that approaches the subject from this angle. The book is aimed at both an academic and general audience and will use methods and approaches from the academic history of medicine, science and technology studies, and literary journalism. I am the sole researcher and writer for this project.

5. On May 14, 2024, NEH issued an Official Notice of Action to UW-Madison (Federal Award ID Number DOI-299637-24), setting forth the terms and conditions of the grant award. The performance period of the award was for 2 years, from July 1, 2024, through June 30, 2026. The total expected funding under the award was \$75,000.

6. With the awarded NEH funds, I began researching a new chapter of the project. I had a section of the book accepted for presentation at two different professional meetings—the American Association of the History of Medicine and the Society for Social Studies of Technology. I also scheduled and paid for a weeklong May 2025 writing retreat to focus solely on research and writing for the project.

7. On April 2, 2025, the UW-Madison Research and Sponsored Programs office received an email from Grant_Notifications@NEHemail.onmicrosoft.com informing UW-Madison the grant funding my project was terminated.

8. The notification was addressed to the grant administrator and included the Federal Award ID Number, although it was erroneously referenced as grant application number. It appeared to be a form letter.

9. The notification included the following:

Your grant no longer effectuates the agency's needs and priorities and conditions of the Grant Agreement and is subject to termination due to several reasonable causes, as outlined in *2CFR§200.340*. NEH has reasonable cause to terminate your grant in light of the fact that the NEH is repurposing its funding allocations in a new direction in furtherance of the President's agenda. The President's February 19, 2025 executive order mandates that the NEH eliminate all non-statutorily required activities and functions. *See Commencing the Reduction of the Federal Bureaucracy*, E.O. 14217 (Feb. 19, 2025). Your grant's immediate termination is necessary to safeguard the interests of the federal government, including its fiscal priorities. The termination of your grant represents an urgent priority for the administration, and due to exceptional circumstances, adherence to the traditional notification process is not possible. Therefore, the NEH hereby terminates your grant in its entirety effective April 2, 2025.

10. I was approximately 9 months into the project's period of performance when the grant was terminated. The remaining balance of funds committed by NEH to UW-Madison, minus expenses incurred through the date of award termination, is approximately \$45,377.37. With the remaining funds, I would have researched and written at least 70% of the book along with writing a detailed book proposal to submit to potential publishers providing me the opportunity to obtain funding to complete the project.

11. Upon learning of the termination, UW-Madison had to end funding for this project immediately.

12. As a result of this termination, I am now facing sudden financial hardship as well as loss of professional status. The grant funding amounted to approximately 1/3 of my income. Its loss is very significant to me and my family. After receiving the termination, I stopped work on the project and began searching for other employment to make up for the loss of income. This takes up the time and energy I would have spent researching and writing the book, and prevents me from making progress. Recently I have begun unfunded work on the project again, however the work is minimal because I now must spend my time job-hunting and working to replace my

lost income. I am a single parent with both child and aging parent caregiving responsibilities.

There is no backup wage earner in my home.

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

Executed on May 9, 2025 in Madison, WI.

A handwritten signature in black ink, appearing to read 'CWenc', is written above a solid horizontal line.

Christine Wenc