

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

DC PRESERVATION LEAGUE, et al.,

Plaintiffs,

v.

**BOARD OF TRUSTEES OF THE JOHN F.
KENNEDY CENTER FOR THE
PERFORMING ARTS, et al..**

Defendants.

Civil Action No. 1:26-cv-00981

DECLARATION OF THADDEUS A. HEUER

I, Thaddeus A. Heuer, hereby declare and state as follows pursuant to 28 U.S.C. § 1746:

1. I am an attorney at the law firm Foley Hoag LLP and am counsel for plaintiffs in the above-captioned matter.

2. I submit this declaration in support of plaintiffs' Motion for Preliminary Injunction, filed herewith.

3. Attached as Exhibit 1 to this declaration is a true and correct copy of a Truth Social post from the Truth Social account of Donald J. Trump, dated February 1, 2026.

4. Attached as Exhibit 2 to this declaration is a true and correct copy of a webpage maintained by the Kennedy Center and titled "History," as it appeared on March 29, 2026.

5. Attached as Exhibit 3 to this declaration is a true and correct copy of a webpage maintained by the Kennedy Center and titled "Explore Our Spaces," as it appeared on March 29, 2026.

6. Attached as Exhibit 4 to this declaration is a true and correct copy of a webpage maintained by the Kennedy Center and titled "On This Day In 1964, Construction On The Kennedy

Center Began,” by Hannah Middlebrook and dated December 2, 2024, as it appeared March 29, 2026.

7. Attached as Exhibit 5 to this declaration is a true and correct copy of a webpage maintained by the Kennedy Center and titled “Kennedy Center Trivia,” by Sadie Gronigan and dated July 10, 2024, as it appeared March 29, 2026.

8. Attached as Exhibit 6 to this declaration is a true and correct copy of a webpage maintained by the Kennedy Center and titled “Concert Hall,” as it appeared on March 29, 2026.

9. Attached as Exhibit 7 to this declaration is a true and correct copy of a webpage maintained by the Kennedy Center, titled “Our Story,” as it appeared March 29, 2026.

10. Attached as Exhibit 8 to this declaration is a true and correct copy of a webpage maintained by EDSA and titled “John F. Kennedy Center for the Performing Arts,” as it appeared on March 30, 2026.

11. Attached as Exhibit 9 to this declaration is a true and correct copy of an article by Bob Mondello titled “The Kennedy Center's history was marked by cooperation and independence—until now,” published by NPR and dated February 19, 2025.

12. Attached as Exhibit 10 to this declaration is a true and correct copy of a Truth Social post from the Truth Social account of Donald J. Trump, dated February 7, 2025.

13. Attached as Exhibit 11 to this declaration is a true and correct copy of a Truth Social post from the Truth Social account of Donald J. Trump, dated February 10, 2025.

14. Attached as Exhibit 12 to this declaration is a true and correct copy of an article by Javier C. Hernández, Robin Pogrebin, and Shawn McCreech titled “Trump Names Loyalist Interim Leader of Kennedy Center as He Strengthens His Grip,” published by the New York Times and dated February 10, 2025.

15. Attached as Exhibit 13 to this declaration is a true and correct copy of a Truth Social post from the Truth Social account of Donald J. Trump, dated February 12, 2025.

16. Attached as Exhibit 14 to this declaration is a true and correct copy of a press release issued by the Kennedy Center and titled “Kennedy Center Board elects President Donald J. Trump as Board Chair,” dated February 12, 2025.

17. Attached as Exhibit 15 to this declaration is a true and correct copy of an article by Shawn McCreech and Javier C. Hernández titled “Trump Visits the Kennedy Center and Muses on Hosting its Honors Gala,” published by the New York Times and dated March 17, 2025.

18. Attached as Exhibit 16 to this declaration is a true and correct copy of a document titled “TRANSCRIPT: President Trump Announces the 2025 Kennedy Center Honorees, 8.13.25” published by the U.S. Senate Democratic Caucus and dated August 13, 2025.

19. Attached as Exhibit 17 to this declaration is a true and correct copy of a social media post from the X account of the Kennedy Center, dated September 9, 2025.

20. Attached as Exhibit 18 to this declaration is a true and correct copy of a Memorandum of Agreement regarding the Kennedy Center Expansion Project among the National Park Service, the National Capital Planning Commission, the District of Columbia State Historic Preservation Office, and the John F. Kennedy Center for the Performing Arts.

21. Attached as Exhibit 19 to this declaration is a true and correct copy of an article by Shawn McCreech titled “As Trump Puts His Brand on Washington, the Kennedy Center Gets a New Name,” published by the New York Times and dated December 18, 2025.

22. Attached as Exhibit 20 to this declaration is a true and correct copy of a press release issued by Rep. Joyce Beatty and titled “Statement from Kennedy Center Ex-Officio Board Members on Trump’s Illegal Effort to Rename Arts Institution,” dated December 18, 2025.

23. Attached as Exhibit 21 to this declaration is a true and correct copy of an article by Shawn McCreesh and Chris Cameron titled “Trump’s Name Joins Kennedy’s on Performing Arts Center’s Façade,” published by the New York Times and dated December 19, 2025.

24. Attached as Exhibit 22 to this declaration is a true and correct copy of an article by Gabe Gutierrez, Monica Alba, Peter Alexander and Dareh Gregorian, titled “White House’s entire East Wing to be demolished ‘within days,’ officials say,” published by NBC News and dated October 22, 2025.

25. Attached as Exhibit 23 to this declaration is a true and correct copy of a Truth Social post from the Truth Social account of Donald J. Trump, dated October 20, 2025.

26. Attached as Exhibit 24 to this declaration is a true and correct copy of an article by Joshua Barajas and Dan Cooney, titled “The East Wing of the White House has been demolished. Here’s a look at its history,” published by PBS News and dated October 24, 2025.

27. Attached as Exhibit 25 to this declaration is a true and correct copy of a press release issued by Rep. April McClain Delaney and titled “Congresswoman McClain Delaney Introduces Legislation to Overturn the Attempted Illegal Renaming of the John F. Kennedy Center for the Performing Arts,” dated December 23, 2025.

28. Attached as Exhibit 26 to this declaration is a true and correct copy of the text of House Resolution 973, dated December 30, 2025.

29. Attached as Exhibit 27 to this declaration is a true and correct copy of an article by Adam Nagourney, titled “Washington National Opera Is Leaving the Kennedy Center,” published by the New York Times and dated January 9, 2026.

30. Attached as Exhibit 28 to this declaration is a true and correct copy of an article by Adam Nagourney, titled “Philip Glass Withdraws From Kennedy Center, as Its Symphony Vows to Play On,” published by the New York Times and dated January 27, 2026.

31. Attached as Exhibit 29 to this declaration is a true and correct copy of an article titled “Kennedy Center: An Updated List of Every Artist Who’s Canceled,” published by Consequence of Sound and dated January 5, 2026.

32. Attached as Exhibit 30 to this declaration is a true and correct copy of an article by Michelle Stoddart, Emily Chang, Benjamin Siegel, and Leah Sarnoff, titled “Trump says steel to be ‘fully exposed’ in Kennedy Center rebuild but ‘not ripping it down,’” published by ABC News and dated February 2, 2026.

33. Attached as Exhibit 31 to this declaration is a true and correct copy of an article by Anastasia Tsioulcas, titled “You have lots of questions about Trump's Kennedy Center renovation. We do, too,” published by NPR and dated February 4, 2026.

34. Attached as Exhibit 32 to this declaration is a true and correct copy of a press release issued by the Kennedy Center and titled “The John F. Kennedy Center for the Performing Arts announces New Additions to Executive Team,” dated May 2, 2024.

35. Attached as Exhibit 33 to this declaration is a true and correct copy of an article by Julia Jacobs, titled “Kennedy Center Board Votes to Close for 2-Year Renovation Project,” published by the New York Times and dated March 16, 2026.

36. Attached as Exhibit 34 to this declaration is a true and correct copy of an article by Betsy Klein, titled “Top architectural and historic preservation groups sue Trump over Kennedy Center plans,” published by CNN and dated March 23, 2026.

37. Attached as Exhibit 35 to this declaration is a true and correct copy of a Memorandum of Agreement regarding the implementation of the requirements of the National Environmental Policy Act between the National Capital Planning Commission and the Smithsonian Institution.

38. Attached as Exhibit 36 to this declaration is a true and correct copy of the National Capital Planning Commission's April 2, 2026 Meeting Agenda.

39. Attached as Exhibit 37 to this declaration is a true and correct copy of a webpage maintained by the Kennedy Center, titled "Your Impact," as it appeared on March 29, 2026.

40. Attached as Exhibit 38 to this declaration is a true and correct copy of a webpage maintained by the Kennedy Center, titled "A Living Memorial," as it appeared on March 29, 2026.

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

Executed this 31st day of March, 2026.

/s/ Thaddeus A. Heuer
Thaddeus A. Heuer