FILED: NEW YORK COUNTY CLERK 07/08/2017 12:16 AM

NYSCEF DOC. NO. 66

INDEX NO. 153826/2017

RECEIVED NYSCEF: 07/08/2017

Motion Sequence #2

SUPREME COURT OF THE STATE OF NEW YORK COUNTY OF NEW YORK

In the Matter of,

AHMAD AWAD, SOFIA DADAP, SAPPHIRA LURIE, and JULIE NORRIS,

Petitioners,

-against-

FORDHAM UNIVERSITY,

Respondent,

For a Judgment Pursuant to Article 78 of the Civil Practice Law and Rules.

Index No. 153826/2017

AFFIDAVIT OF IRÈNE LUCIA DELANEY

Hon. Nancy M. Bannon

STATE OF NEW YORK) ss: COUNTY OF NEW YORK)

Irène Lucia Delaney, being duly sworn, deposes and says:

- 1. I am a graduate student at the University of Michigan in the French PhD program. I have served as a member of the Steering Committee of National Students for Justice in Palestine (NSJP) since May 2016. I am also a member of the campus Palestine solidarity group Students Allied for Freedom and Equality (SAFE) at the University of Michigan Ann Arbor, and I was an executive member of Bryn Mawr College Students for Justice in Palestine (SJP) (formerly "Voices for Palestine") as an undergraduate student from 2013 until 2016.
- 2. I submit this Affidavit in support of petitioners Ahmad Awad, Sofia Dadap, Sapphira Lurie, and Julie Norris, and specifically to explain the relationship between NSJP and

COUNTY CLERK 07/08/2017

NYSCEF DOC. NO. 66

held this year in the South.

INDEX NO. 153826/2017

RECEIVED NYSCEF: 07/08/2017

the local student groups that affiliate with the informal NSJP network, many of which are called "SJP."

3. NSJP is an independent grassroots organization composed of students and recent graduates. NSJP was established in 2010 when a network of student activists from across the country began organizing around a growing desire to host a central gathering/conference so that students from local student groups across the country could meet to exchange thoughts and ideas. Since then, NSJP has organized six annual national conferences in the West, Midwest, and East to bring together student activists from across the country. Our seventh annual conference will be

- 4. In 2011, NSJP adopted three points of unity from the 2005 call by Palestinian civil society for Boycott, Divestment, and Sanctions (BDS) campaigns to pressure Israel to respect Palestinian rights and to comply with international law. These points of unity are:
 - Ending Israel's occupation and colonization of all Arab lands and dismantling the Wall;
 - Recognizing the fundamental rights of the Arab-Palestinian citizens of Israel to full equality; and
 - Respecting, protecting and promoting the rights of Palestinian refugees to return to their homes and properties as stipulated in UN Resolution 194.
- 5. Any student-led organization, regardless of its name, whose primary work is to advance these goals is eligible to attend NSJP's annual national conference and/or use resources we provide, such as our newsletter. By doing so, these groups voluntarily become part of the NSJP's informal network. When these local student organizations choose to become part of NSJP's informal network, they do not become members of NSJP. NSJP is not a membership organization.
- It is important to note that there are several campus-based organizations that use 6. the name SJP that have chosen not to attend our annual conferences, and have no established

CLERK

INDEX NO. 153826/2017

RECEIVED NYSCEF: 07/08/2017

connection or communication with NSJP. As a result, they are not part of NSJP's informal

network.

7. The local organizations that are in the unofficial NSJP network run completely

independently of and autonomously from NSJP. Besides sharing points of unity, we do not

dictate the structure, programming, or any other aspect of local organizations. As noted on our

website, "all individual SJPs are autonomous student orgs on their respective campuses." All

local organizations in the NSJP network are student-led and determine their own missions,

visions, and goals. They plan their own events and campaigns, and they coordinate all efforts as

independent groups. Local organizations also have charters, membership guidelines, and/or

policies in place according to the rules of their respective schools.

In practice, NSJP does not speak for or on behalf of local SJPs or other local 8.

groups in our network. NSJP does not comment on, condone, or condemn the actions, tactics, or

strategies used by any local organization.

9. NSJP does not impose any financial requirements on local organizations that are

part of our network. NSJP is volunteer-run. Our work is done through two branches of our

Steering Committee, comprised of students and recent graduates who have volunteered their time

(Action Committee), some of whom were chosen by election or consensus in their region

(Coordinating Committee).

The main function of NSJP is to organize an annual national conference to bring 10.

together students from local organizations in our network to attend skill-building and political

development workshops, meet with fellow organizers, and learn about other social justice

¹ About Us, NAT'L STUDENTS FOR JUSTICE IN PALESTINE, http://www.nationalsip.org/about.html (last visited July 3,

2017).

3

3 of 5

'ILED: NEW YORK COUNTY CLERK 07/08/2017 12:16 AM

NYSCEF DOC. NO. 66

INDEX NO. 153826/2017

RECEIVED NYSCEF: 07/08/2017

movements. Participation in our conference is voluntary; local organizations are not required to

attend.

11. From time to time, we also assist local student groups in our network with

organizing needs and facilitate connections between local groups that request support and

activists who can offer and provide support. We only provide direct support to local groups upon

explicit request.

12. Today, there are student groups on over 180 college campuses across the country

that form the U.S.-wide student advocacy movement for Palestinian freedom and equality. Most

of these groups are registered with their respective college or university under the name

"Students for Justice in Palestine" or "SJP." However, some such campus-based groups do not

use the name SJP. For example, Palestine Solidarity Committee (PSC) at the University of

Texas-Austin, Students Against Israeli Apartheid (SAIA) at George Mason University, Students

Allied for Freedom and Equality (SAFE) at the University of Michigan – Ann Arbor, Students

for Peace and Justice in Palestine (SPJP) at Swarthmore College, and Students United for

Palestinian Equal Rights (SUPER) at the University of Washington are all local campus

organizations that are part of NSJP's informal network.

13. In short: as mentioned above, local organizations that are called SJP are not

necessarily affiliated with NSJP, and not all local organizations that are affiliated with NSJP are

called SJP. Affiliation with the NSJP network does not amount to membership in NSJP, and

NSJP does not dictate or impose requirements on affiliated local groups.

4

4 of 5

FILED: NEW YORK COUNTY CLERK 07/08/2017 12:16 AM

NYSCEF DOC. NO. 66

INDEX NO. 153826/2017

RECEIVED NYSCEF: 07/08/2017

Irène Lucia Delaney

Sworn to me this $\frac{1}{2}$ th day of July, 2017

Dhoraf he Ward

