

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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Roy Den Hollander,

Plaintiff on behalf of himself and all others  
similarly situated,

Docket No.  
10 CV 9277  
(LTS)(HBP)(ECF)

-against-

Members of the Board of Regents of the University of the State of  
New York, in their official and individual capacities;  
Chancellor of the Board of Regents, Merryl H. Tisch, in her official  
and individual capacity;  
New York State Commissioner of the Department of Education,  
David M. Steiner, in his official and individual capacity;  
Acting President of the New York State Higher Education Services  
Corp., Elsa Magee, in her official and individual capacity;  
U.S. Department of Education; and  
U.S. Secretary of Education, Arne Duncan, in his official capacity;

Defendants.  
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**DECLARATION OF ROY DEN HOLLANDER IN OPPOSITION TO THE STATE AND  
U.S. DEFENDANTS' MOTIONS FOR SUMMARY JUDGMENT BEFORE ANY  
DISCOVERY HAS TAKEN PLACE**

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Roy Den Hollander, the plaintiff class representative and an attorney admitted to practice in this Court, affirms the following under the penalty of perjury:

1. I am fully familiar with and have personal knowledge of the facts set forth in this declaration.

2. The inculcation, manifestation, and exposure of Feminism at Columbia University is offensive to the plaintiff class representative and makes him very uncomfortable with the result of interfering with his use and enjoyment of Columbia University (“Columbia”) facilities and events.

3. Feminism is ubiquitous at Columbia, which brings the class representative into direct contact with that offensive religion; thereby, making it an uncomfortable part of his experience in using the facilities of Columbia, attending events, or taking advantage of the benefits that Columbia provides as his alma mater.

4. As one pre-discovery indication of the pervasiveness of Feminism at Columbia, the following searches by the class representative on Columbia’s website,

<http://www.columbia.edu/>, provided the following results:

- a. “Feminist” yields 6020 references;
- b. “Feminism” yields 1440 references;
- c. “Masculinity” yields 613 references;
- d. “Masculine” yields 586 references;
- e. “Women’s issues” yields 1620 references; and
- f. “Men’s issues” yields 454 references.

5. The Class Representative uses Columbia for library resources, career networking, e-mail services, discussion groups, career support, access to Columbia publications, attending various events, discounts and special offers, electronic learning, and pod-casts to listen to the newest ideas on campus.

6. The Class Representative receives communications from Columbia that enter his home through the U.S. Post and Internet which disseminate the offensive orthodoxy of Feminism.

7. As an alumnus, the Class Representative may also take courses in Columbia's Continuing Education auditing program without meeting the qualifications required of the general public and prepare for further graduate work through its Post Baccalaureate Studies.

8. Such programs, courses, and studies, however, due to the New York State Board of Regents ("Regents") and the New York State Department of Education's ("SED") requirement that all higher education activities conform to the doctrine of Feminism, assure that the Class Representative will encounter and be confronted with unwelcome and offensive Feminist dogma from the Columbia administration, professors, counselors, materials, and school activities.

9. For example, during one seminar at Columbia's School of International and Public Affairs, the Class Represented stated that females in underdeveloped countries often view their children as human capital to help provide money for the family. The admitted Feminists in the seminar immediately engaged in a loud-mouth barrage of obloquy and calumny against the Class Representative for criticizing mothers. During the Feminist rant, the assistant professor turned away. He later apologized to the Class Representative for failing to intervene so as to keep the discussion on a civil level.

10. The Class Representative is not simply a bystander from the general public using the court to vindicate abstract value interests or a citizen uninvolved with Columbia complaining of the nonobservance of the Constitution.

11. Neither are the alleged injuries in this case simply noncognizable, psychological consequences produced by a fleeting observation of personally disagreeable conduct.

12. The Class Representative repeatedly comes into direct contact with Feminism and the unwelcome observation of the manifestations of Feminism that would require him to alter his behavior in order to avoid such.

13. The Class Representative is also made to feel that he is an unwilling participant in a faith not his own when he enters a space dedicated to two separate functions, education and inculcating Feminism.

14. The prevalence of Feminism at Columbia makes the Class Representative feel as a nonadherent, an outsider, and not a full member of the Columbia Community.

15. For example, when the Class Representative brought the *Den Hollander I* case in 2008, Columbia's student newspaper, the Spectator, requested he write an opinion piece about why he filed the case. (Ex. 1). The Spectator refused to publish the piece stating that it was "hard" on females.

16. Another example of Feminism trumping traditional American values such as freedom of speech is that Columbia has a Women's Studies program but no Men's Studies program. Preferential treatment for the majority without similar assistance to the minority violates the fundamental concept of fairness.

17. According to the New York State Office of Research and Information Systems, Columbia University received \$39.9 million in Bundy aid from the school year 1996-1997 to 2007-2008. (Ex. 2).

Dated: New York, N.Y.  
June 16, 2011

/S/

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