

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

**MARGARET CZERWIENSKI,
LILIA KILBURN, and AMULYA
MANDAVA**

Plaintiffs,

v.

CASE No. 1:22-cv-10202-JGD

**HARVARD UNIVERSITY AND THE
PRESIDENT AND FELLOWS OF
HARVARD COLLEGE**

Defendants.

AFFIDAVIT OF KWOK W. YU

I, Kwok W. Yu, hereby depose and state under oath and upon personal knowledge:

1. My name is Kwok W. Yu. I currently serve as a Senior Associate Dean for Faculty Affairs for the Faculty of Arts and Sciences (“FAS”) at Harvard University. In that role, I work closely with FAS Dean Claudine Gay on a variety of faculty related matters, including matters relating to Title IX and professional conduct. I serve as the Title IX Resource Coordinator and Liaison for FAS. I have worked at Harvard since 2002.

2. On August 27, 2021, in my capacity as Title IX Resource Coordinator and Liaison for FAS, I received a copy of Final Report and exhibits of the Office of Dispute Resolution (“ODR”) concerning the allegations made by graduate student Lilia Kilburn against Professor John Comaroff.

3. The question of what sanction to impose against Professor Comaroff based on ODR's finding against him rests with FAS. For that reason, I shared ODR's Final Report, including the Exhibits, with Dean Gay, the Administrative Dean for Faculty Affairs and Planning Nina Zipser, and Dean of Social Science Lawrence D. Bobo, the group who provided advice to Dean Gay in connection with consideration of a sanction against Professor Comaroff based on ODR's finding and in connection with the question whether to proceed with a professional conduct review. I also provided a copy of the Final Report, including the Exhibits, to a lawyer in Harvard's Office of General Counsel who provided legal counsel to this group.

4. To effectuate the sanction imposed against Professor Comaroff, I provided a copy of the Report, without exhibits—specifically, without Kilburn's therapist's notes—and with the sections of the Report relating to Ms. Kilburn's therapist redacted, to one other individual.

5. I did not otherwise distribute the Final Report or exhibits.

Signed under the pains and penalties of perjury this __ day of May 2022.



Kwok W. Yu