

EXHIBIT 2

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8 **IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA
FRESNO DIVISION**

9 TAYLOR ANDERS, HENNESSY EVANS,
10 ABBIGAYLE ROBERTS, MEGAN WALAITIS, and
11 TARA WEIR, individually and on behalf of
all those similarly situated

12 *Plaintiffs,*
13 v.

14 CALIFORNIA STATE UNIVERSITY, FRESNO,
TERRENCE TUMEY, in his official capacity as
15 Director of Athletics at California State University, Fresno,
JOSEPH CASTRO, in his official capacity as
16 former President of California State University,
Fresno, DR. SAÚL JIMÉNEZ-SANDOVAL,
17 in his official capacity as Interim
President of California State University, Fresno

18 *Defendants.*

Case No. _____

**DECLARATION OF
HENNESSEY EVANS**

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20 I, Hennessy Evans, am over 18 years of age and competent to make the following statement. All
21 of the statements below are based on my personal knowledge.

22 1. I am currently enrolled at California State University, Fresno (“Fresno State”). I am a
23 sophomore majoring in criminology. I expect to graduate in 2023.

24 2. I am a member of the women’s lacrosse team at Fresno State and I have three years of
25 athletic eligibility left.

26 3. I am a named plaintiff in this action and I make this declaration in support of this Court
27 preserving the women’s varsity lacrosse team.

1 4. I am personally, deeply affected by Fresno State’s decision to eliminate the women’s
2 lacrosse team.

3 5. I am from Rancho Santa Margarita, California. I started playing lacrosse in first grade.
4 My older brothers, who also play lacrosse in college, taught me the game and I never looked back.
5 I dedicated my life to lacrosse. From a young age, I knew I wanted to be a Division I athlete and
6 play at the highest level.

7 6. I worked extremely hard to achieve my goal. I trained several times a week throughout
8 my childhood, sacrificed time with friends and family, and participated in countless practices,
9 games, and tournaments.

10 7. I was a four-year starter on the varsity lacrosse team at Trabuco Hills High School.
11 Over that four-year span, I accumulated 401 goals, 52 assists, and 453 points. I averaged five goals
12 per game, was the team captain and was named a U.S. All-American. I was also a member of my
13 high school cross country and track teams.

14 8. I also played club lacrosse in middle and high school. There are very few lacrosse
15 tournaments in California, so my team often had to travel to the east coast of the United States to
16 play in tournaments. In seventh and eighth grade, I did independent study and did not attend in-
17 person school. I would often be on the East Coast for up to three weeks in a row for tournaments.
18 It was too expensive for my parents to fly me back and forth every weekend. I started going to
19 school in-person in high school and, at that time, my parents had to pay to fly me back and forth
20 for tournaments. I, with the help of my family, completely dedicated myself to the sport – all in an
21 effort to get to this level.

22 9. I am proud that I achieved my lifelong goal of playing lacrosse at the Division I level
23 on a full scholarship and that I excelled during my freshman year on the Fresno State lacrosse
24 team. As a freshman, I appeared in all eight games. I scored four goals and had one assist. I was
25 nominated for Rookie of the Week four times.

26 10. I decided to attend Fresno State because I loved the lacrosse team and because Fresno
27 State gave me the chance to succeed as a Division I athlete. I was also drawn to Fresno State
28

1 because it offers a well-respected criminology program. My professional goal upon graduation is
2 to be a police officer or work for the United States Secret Service.

3 11. I have been unable to transfer to a school that offers Division I lacrosse and therefore,
4 by eliminating the women's varsity lacrosse team, Fresno State took away any opportunity for me
5 to finish my collegiate career as a Division I athlete – something I worked for my entire life.

6 12. The administration's decision took away the reason I chose to attend Fresno State – to
7 play Division I lacrosse. Without lacrosse, I lost my best friends and the ability to make
8 professional connections through my sport. I also lost part of what makes me who I am. Lacrosse
9 is part of my identity.

10 13. Lacrosse teaches invaluable skills that will translate to life beyond the sport –
11 including hard work, patience, mental strength, and integrity – that are developed throughout the
12 course of one's competitive career. When you are a member of a Division I Collegiate team, you
13 also learn interpersonal skills such as teamwork, communication, and compromise. These are skills
14 that give me and my teammates a competitive edge in the professional workspace.

15 14. If there is no varsity lacrosse team at Fresno State, I will not have the opportunity to
16 enjoy the experiences that varsity lacrosse uniquely provides -- or to inform future employers and
17 graduate schools that I was a four-year varsity Division I student-athlete. This negatively impacts
18 my future. Employers and graduate schools look favorably upon student-athletes because of the
19 rigor and dedication it takes to play at the highest level.

20 15. I feel betrayed, belittled, and confused by Fresno State's decision to cut the lacrosse
21 team. I was surprised that our team was cut, but women's teams are often treated unfairly and
22 unequally at Fresno State.

23 16. We do not get our names on our jerseys, but the men's teams do. Men's teams get new
24 t-shirts every month; we do not.

25 17. The football team gets a dedicated recruiter whose job it is to find players for them;
26 women's teams do not.

1 18. While both men's and women's teams have athletic academic counselors, the men's
2 teams are given far more attention and support while the women's teams are treated as an
3 afterthought.

4 19. Football and men's basketball get three meals a day and food delivered after practices;
5 women's teams do not. Men's basketball gets one-on-one training; women's teams do not. The
6 men's basketball team has two locker rooms; women's teams do not.

7 20. The men's teams get massages when they want them; women's teams do not.

8 21. Finally, Fresno State fills coaching positions for men's teams first. Meanwhile, the
9 lacrosse team was without a permanent head coach for over a year.

10 22. Since the elimination of our team was announced, the football team has taken over our
11 locker room, and we are not allowed to get our equipment out. The athletics department put the
12 personal belongings we kept in our locker room into the showers. We are treated as though our
13 contributions to the university do not matter.

14 23. Since learning that Fresno State was eliminating the lacrosse team, I have never felt
15 so lost. The devastation I felt and still feel cannot be overstated. I lost my teammates and my sport
16 in one day. I am now left trying to determine whether I should transfer or continue my education
17 at Fresno State.

18 24. If the court does not intervene, I will continue to be irreparably harmed. I am
19 committed to advocating for the ability for women to play at an equal rate to men. I hope that the
20 Court will clearly see the facts of this case and how Fresno State has discriminated against its
21 women athletes in violation of Title IX. I hope that the Court sees the negative impact Fresno
22 State's decision is having on me and my teammates and preserves the women's lacrosse team as
23 quickly as possible.

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

25
26 Dated: February 8, 2021



27 Hennessey Evans