

# EXHIBIT 1-I

DECLARATION OF MARIE CAGGIANO, M.D.

I, Marie Caggiano, declare as follows:

1. I am the Medical Director of Student Health Service at Tufts University (“Tufts Health Service”). I have been the Medical Director since April 1, 2020. I am responsible for overseeing the primary healthcare site for undergraduate and graduate students on the Medford/Somerville campus. I am also an Assistant Professor of Medicine at the Tufts University School of Medicine in Boston, Massachusetts.

2. Before coming to Tufts, I worked as a primary care physician at the Massachusetts Institute for Technology (MIT) for seven years and also served as Chief of Primary Care. I earned my M.D. from Boston University School of Medicine and completed my residency training in family medicine, fellowship in preventive medicine, and a Masters in Public Health from the University of Massachusetts.

3. As the Medical Director at Tufts Health Service, I have personal knowledge of the contents of this declaration, or have knowledge of the matters described in this declaration based on my review of information and records gathered by Tufts University personnel, and could testify thereto.

4. Tufts Health Service offers both in-person and telehealth appointments for acute illness or injury, management of chronic disease management (such as asthma), routine healthcare and urgent care needs. Tufts Health Service is centrally located on Professors Row, which is a short walk from most residence halls and classrooms, with ample, accessible street parking. Tufts Health Service is open year-round (including during the summer), five days a week, during most normal business hours. Telehealth appointments are available in the evenings, Monday through Friday, from 5 p.m. to 7 p.m. When the Health Service is closed

(weekends and holidays), students can access after-hours care including nurse triage and clinician on call services.

5. With Ms. Öztürk's permission, I can share that she utilized Tufts Health Service for ongoing management of asthma and a chronic eye condition, both of which required medication. To help ensure the accuracy and completeness of my submission, I spoke with the other providers at Tufts Health Service who treated Ms. Öztürk most frequently. I also reviewed Ms. Öztürk's medical record, which included treatment and exam notes, prescriptions, communications with providers, and visits that spanned from March 17, 2021 through February 26, 2025.

6. Ms. Öztürk was first treated for asthma at Tufts Health Service on July 11, 2023, concurrent with a COVID-19 infection. During that visit, Ms. Öztürk reported that she had been previously diagnosed with asthma and was using previously prescribed medications including a maintenance inhaler and a rescue inhaler to treat her symptoms.

7. A Tufts Health Service provider counseled Ms. Öztürk on continued use of asthma medication, recommended increasing the frequency of use of the rescue inhaler, and prescribed additional medication to ensure that she had an adequate supply. The provider also scheduled a follow-up appointment for continued monitoring of her symptoms given the severity of the respiratory issues she described she was experiencing and her providers' concern that symptoms could worsen if not treated effectively.

8. Following her viral infection in July, Ms. Öztürk continued to experience symptoms related to asthma for the next two months. During that time, Ms. Öztürk was in regular communication with Tufts Health Service and took appropriate and proactive steps to manage her chronic condition through follow-up appointments and timely prescription refills.

The initial exacerbation of Ms. Öztürk's asthma followed by her prolonged recovery posed significant health risk during this period and it was important that she was able to remain in close contact with her provider.

9. By September 2023, Ms. Öztürk reported that she was feeling better and asked her provider about continued use of her maintenance inhaler. Her provider advised Ms. Öztürk that she could try to begin to taper her use of the maintenance inhaler but that if her symptoms persisted she should continue using her maintenance inhaler and that they would continue to follow her progress.

10. In September 2024, Ms. Öztürk again reached out to Tufts Health Service requesting a refill of her maintenance inhaler, which her provider refilled for her.

11. Tufts Health Service did not treat Ms. Öztürk for any another asthma exacerbation, though she appropriately sought care from Tufts Health Service for other medical concerns and communicated with her providers throughout her time at Tufts. Based on my review of these communications and the overall medical record, it appears that her asthma remained in good control with as-needed use of her prescribed inhalers.

12. With Ms. Öztürk's permission, I can share that her providers at Tufts Health Service assessed her asthma to be well-managed overall while she was at Tufts, with the exception of her July 2023 exacerbation which coincided with a viral infection.

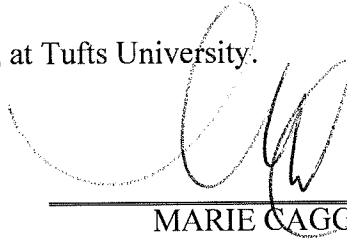
13. When Tufts Health Service became aware of Ms. Öztürk's detention in Louisiana her providers were concerned about her health and discussed whether she would have access to her asthma medications and continued treatment for this chronic condition. Her providers also identified that in a congregate living setting, the risk of asthma exacerbation and asthma

complications would be increased due to Ms. Öztürk's inability to isolate herself from sick people or avoid other environmental triggers.

14. If Ms. Öztürk is released from detention and able to return to Tufts, her providers would welcome the opportunity to resume her care at Tufts Health Service. Upon her return, Tufts Health Service will be able to provide Ms. Öztürk with regular access to healthcare, medication and a controlled environment in which she will be able to limit her exposure to viral infection and other potential environmental triggers.

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

Executed on May 1, 2025, at Tufts University.

A handwritten signature in black ink, appearing to read 'Marie Caggiano', is written over a horizontal line.

MARIE CAGGIANO, M.D.