

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

AMERICAN ASSOCIATION OF
UNIVERSITY PROFESSORS,

AMERICAN ASSOCIATION OF
UNIVERSITY PROFESSORS-HARVARD
FACULTY CHAPTER,

AMERICAN ASSOCIATION OF
UNIVERSITY PROFESSORS AT NEW
YORK UNIVERSITY,

RUTGERS AMERICAN ASSOCIATION OF
UNIVERSITY PROFESSORS-AMERICAN
FEDERATION OF TEACHERS, and

MIDDLE EAST STUDIES ASSOCIATION,

Plaintiffs,

v.

MARCO RUBIO, in his official capacity as
Secretary of State, and the DEPARTMENT
OF STATE,

KRISTI NOEM, in her official capacity as
Secretary of Homeland Security, and the
DEPARTMENT OF HOMELAND
SECURITY,

TODD LYONS, in his official capacity as
Acting Director of U.S. Immigration and
Customs Enforcement,

DONALD J. TRUMP, in his official capacity
as President of the United States, and

UNITED STATES OF AMERICA,

Defendants.

Civil Action No. 1:25-cv-10685-WGY

**PLAINTIFFS’ MOTION FOR A PRELIMINARY INJUNCTION
AND FOR AN EXPEDITED BRIEFING SCHEDULE**

Pursuant to Federal Rule of Civil Procedure 65(a), Plaintiffs hereby move the Court to preliminarily enjoin Defendants from implementing or enforcing the ideological-deportation policy; to preliminarily enjoin Defendants from threatening to arrest, detain, and deport noncitizen students and faculty based on their lawful political expression; and to stay the policy under the Administrative Procedure Act, 5 U.S.C. § 705. The grounds for this motion are set forth in Plaintiffs’ accompanying memorandum of law in support of their motion.

Because Defendants have already sought to deport several noncitizen students and faculty pursuant to the ideological-deportation policy, and because they have promised to revoke the visas of and arrest, detain, and deport more students and faculty “every day now,” Krishnan Decl. Ex. R at 7 (quoting Defendant Rubio), Plaintiffs respectfully request that the Court expedite briefing on this motion and order the following briefing schedule, to which Defendants consent:

- Defendants’ Opposition: due April 11
- Plaintiffs’ Reply: due April 16

REQUEST FOR ORAL ARGUMENT

Plaintiffs also respectfully request that the Court schedule Plaintiffs’ preliminary injunction motion for oral argument a week after Plaintiffs’ Reply is due, or at the Court’s earliest convenience thereafter. If the Court determines to hold oral argument, Defendants consent to this proposed schedule.

April 1, 2025

Respectfully submitted,

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Counsel for Plaintiffs

*admitted *pro hac vice*

**admission to the bar pending

****pro hac vice* application forthcoming

LOCAL RULE 7.1 CERTIFICATE

I certify that on March 31, 2025, I contacted Erez R. Reuveni, Assistant Director, Office of Immigration Litigation, Civil Division, U.S. Department of Justice, in order to meet and confer regarding the matter. We were unable to resolve or narrow the issues.

Dated: April 1, 2025

/s/ Ramya Krishnan
Ramya Krishnan

CERTIFICATE OF SERVICE

I, the undersigned counsel, certify that on April 1, 2025, I electronically filed the foregoing motion in the United States District Court for the District of Massachusetts using the CM/ECF system. Per Local Rule 5.2, I will serve paper copies of this motion by certified mail to Defendants at the following addresses on April 2, 2025:

Marco Rubio
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The Executive Office, Office of the Legal Adviser
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Washington DC 20522

Department of State
The Executive Office, Office of the Legal Adviser
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Washington DC 20522

Kristi Noem
Secretary of Homeland Security
Office of the General Counsel
U.S. Department of Homeland Security
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Todd Lyons
Acting Director of U.S. Immigration and Customs Enforcement
U.S. Immigration and Customs Enforcement
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Donald J. Trump
President of the United States
The White House
1600 Pennsylvania Avenue NW
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Leah B. Foley
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Washington, DC 20530-0001

Dated: April 1, 2025

/s/ Ramya Krishnan
Ramya Krishnan