

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

JELENA LIU, NINA HU, JUNDE ZHU,
XIAOTIAN YU, XILAI DAI, ZHAORUI NI,
JIDEOFOR ODOEZE,

Plaintiffs,

v.

No. 1:25-cv-716

KRISTI NOEM, in her official capacity
as Secretary of the United States Department
of Homeland Security;
TODD LYONS, in his official capacity as the
Acting Director of United States Immigration
and Customs Enforcement,

Defendants.

Verified Complaint for Declaratory and Injunctive Relief

The plaintiffs, being duly sworn, and by their counsel, say as follows:

Introduction

1. Foreign nonimmigrant students are allowed to remain in the United States for study with F-1 status after receiving an F-1 visa. Student and Exchange Visitor Information Systems (SEVIS) is a database maintained by the Department of Homeland Security that tracks the compliance by international students with their F-1 status. Plaintiffs are nonimmigrant students who reside in Indiana and who are attending Indiana universities with F-1 student status and who have fully complied with all the requirements necessary to maintain their F-1 status. However, on or about April 3, 2025,

the United States Department of Homeland Security (“DHS”) unilaterally terminated the F-1 student status of numerous students throughout the United States, including the plaintiffs, stripping them of their ability to remain in the United States as students. No process was provided to challenge the terminations.

2. The termination of a SEVIS record effectively ends F-1 student status. However, even if a visa is revoked, the United States is not authorized to terminate plaintiffs’ student status. The grounds claimed by the United States in plaintiffs’ SEVIS termination do not provide legal authority to terminate the SEVIS record. An F-1 visa controls a student’s entry into the country, not their continued lawful presence once admitted. Plaintiffs were in full compliance with the terms of their F-1 status and have not engaged in any conduct justifying termination of the status.

3. Assuming that they do not voluntarily depart the country, the plaintiffs are now subject to removal from the United States, which will cause them irreparable harm for which there is no adequate remedy at law. The terminations of the plaintiffs’ SEVIS records represent final agency action by the defendants and inasmuch as there are no valid grounds for the terminations and are contrary to constitutional right, the defendants’ actions violate the Administrative Procedure Act, 5 U.S.C. § 706(2)(A), (B) as they are arbitrary, capricious, an abuse of discretion, and not otherwise in accordance with law and the Constitution. Moreover, plaintiffs have an entitlement to avoid termination of their SEVIS records and the accompanying termination of the F-1 status

unless specific regulatory standards are met and inasmuch as those standards are not met here and plaintiffs have been afforded no opportunity to demonstrate their continuing entitlement, the actions of the defendants also violate basic principles of due process guaranteed by due process secured by the Fifth Amendment to the United States Constitution. Plaintiffs are entitled to declaratory, preliminary, and final injunctive relief reinstating their SEVIS records and F-1 status.

Jurisdiction, venue, cause of action

4. This court has jurisdiction of this case pursuant to 5 U.S.C. § 702, 28 U.S.C. § 1331, and 28 U.S.C. § 1346.
5. Declaratory relief is authorized by Fed. R. Civ. P. 57 and 28 U.S.C. §§ 2201, 2202.
6. Venue is proper in this district pursuant to 28 U.S.C. § 1391.

Parties

7. Jelena Liu is an adult resident of Marion County, Indiana.
8. Nina Hu is an adult resident of Tippecanoe County, Indiana.
9. Junde Zhu is an adult resident of Tippecanoe County, Indiana.
10. Xiaotian Yu is an adult resident of Tippecanoe County, Indiana.
11. Xilai Dai is an adult resident of Tippecanoe County, Indiana.
12. Zhaorui Ni is an adult resident of Tippecanoe County, Indiana.
13. Jideofor Odoeze is an adult resident of St. Joseph County, Indiana.

14. Kristi Noem is the duly appointed Secretary of the United States Department of Homeland Security. She is sued in her official capacity.

15. Todd Lyons is the duly appointed Acting Director of United States Immigration and Customs Enforcement. He is sued in his official capacity.

Legal background

16. Federal law provides that noncitizens can enroll in government-approved academic institutions as F-1 students. See 8 U.S.C. § 1101(a)(15)(F). Students enter the United States on an F-1 visa issued by the United States Department of State. Then, once they enter the United States with an F-1 visa, students are granted F-1 student status and permitted to remain in the United States for the duration of status as long as the student continues to meet the requirements established by the regulations governing the student's visa classification.

17. DHS's Student and Exchange Visitor Program (SEVP) is in charge of administering the F-1 student program and tracking information on students in F-1 student status.

18. SEVIS is a web-based database that DHS uses to track and monitor, among others, nonimmigrant students who have F-1 status.

19. An academic institution must obtain formal approval from DHS before it can sponsor a student's F-1 status. An institution must first file an application for School Certification through the SEVIS system. 8 C.F.R. § 214.3.

20. “Each school that educates F-1 students has a Designated School Official (‘DSO’) who monitors, advises, and oversees the students attending his or her institution.” *Jie Fang v. Dir. U.S. Immig. & Cust. Enforc.*, 935 F.3d 172, 175 (3d Cir. 2019).

21. The DSO will issue the I-20 form, which is the Certificate of Eligibility for Nonimmigrant Student Status, which specifies that the person has been admitted to the United States pursuant to the F-1 status. U.S. Dep’t of Homeland Security-Study in the States, *Students and the Form I-20*, <https://studyinthestates.dhs.gov/students/prepare/students-and-the-form-i-20> (last visited Apr. 13, 2025).

22. Noncitizen students are subject to various requirements as set out in federal regulations. 8 C.F.R. § 214.2(f).

23. Among other things, the student must maintain a full course of study. 8 CFR § 214.2(f)(6).

24. Students may also participate in two types of practical training programs. 8 C.F.R. § 214.2(f)(10)(ii). Curricular practical training, or “CPT,” includes alternative work/study, internship, cooperative education, or any other type to required internship or practicum that is offered by sponsoring employers through cooperative agreements with the school” that is “an integral part of an established curriculum.” 8 C.F.R. § 214.2(f)(1)(i). Optional Practical Training, or “OPT” consists of temporary employment that is “directly related to the student’s major area of study.” *Id.* 8 C.F.R. § 214.2(f)(1)(ii).

25. Once a student has completed his or her course of study and any accompanying practical training, he or she has sixty days to either depart the United States or transfer their status to another institution. 8 C.F.R. § 214.2(f)(5)(iv).

26. If a student voluntarily withdraws from the F-1 program, they have 15 days to depart the United States. *Id.*

27. However, “an F-1 student who fails to maintain a full course of study without approval of the DSO or otherwise fails to maintain status is not eligible for an additional period for departure.” *Id.*

28. Under the regulation, DSOs at schools must report through SEVIS to SEVP when a student fails to maintain status. *See* 8 C.F.R. § 214.3(g)(2).

29. SEVIS termination must be based on a student’s failure to maintain status.

30. The regulations distinguish between two separate ways a student may fall out of status: (1) a student who “fails to maintain status”; and (2) an agency-initiated “termination of status.”

31. Students fail to maintain their F-1 status if they fail to comply with applicable regulatory requirements, such as failing to maintain a full course of study, engaging in unauthorized employment, or other violations of their requirements under 8 C.F.R. § 214.2(f). In addition, 8 C.F.R. § 214.1(e)-(g) outlines specific circumstances where certain conduct by any nonimmigrant visa holder, such as engaging in unauthorized employment, providing false information to DHS, or being convicted of a crime of

violence with a potential sentence of more than a year, “constitute a failure to maintain status.”

32. While F-1 status may be lost as outlined above, DHS’s ability to terminate F-1 student status “is limited by [8 C.F.R.] § 214.1(d).” *Jie Fang*, 935 F.3d at 185 n.100. Under this regulation, DHS can terminate F-1 student status only when: (1) a previously granted waiver under 8 U.S.C. § 1182(d)(3) or (4) is revoked; (2) a private bill to confer lawful permanent residence is introduced in Congress; or (3) DHS publishes a notification in the Federal Register identifying national security, diplomatic, or public safety reasons for termination.

33. DHS’s own policy guidance confirms that “[v]isa revocation is not, in itself, a cause for termination of the student’s SEVIS record.” *See* ICE Policy Guidance 1004-04 – Visa Revocations (June 7, 2010) at 3, available at https://www.ice.gov/doclib/sevis/pd/visa_revocations_1004_04.pdf (last visited Apr. 10, 2025).

34. To remove a noncitizen after their nonimmigrant status is revoked, DHS must file the Notice to Appear, which is the charging document that initiates immigration court proceedings.

35. Once the Notice to Appear is filed, the individual may be taken into custody under a Warrant of Arrest.

36. While a visa revocation can be charged as a ground of removability in removal proceedings, 8 U.S.C. § 1227(a)(1)(B), (C); 8 U.S.C. § 1201(i), the Immigration Judge in a

removal proceeding has no ability to review and reverse the SEVIS termination because the process is collateral to removal proceedings. *See Jie Fang*, 935 F.3d at 183.

37. Defendants' action in terminating a student's lawful status in the United States may lead to removal with the student not being able to contest the validity of their termination that is the cause for the removal.

38. The termination of a SEVIS record represents final agency action for purposes of review under the Administrative Procedure Act. *See Jie Fang*, 935 F.3d at 185.

Factual allegations

Jelena Liu

39. Jelena Liu is a student in the second year of a two-year graduate program at Indiana University in Indianapolis where she is studying Human Computer Interactions.

40. Ms. Liu is a citizen of China.

41. Ms. Liu received F-1 status in 2016 for her undergraduate studies at then-IUPUI. Although she initially pursued the major chosen by her family, it was not a good fit, and Ms. Liu began to experience depression. She changed to a new major, and her advisor recommended easing her course load to support her mental health. She then inadvertently dropped too many classes to maintain her status. She discovered this when she attempted to return to the United States from China after winter break and discovered that the visa had been revoked. It was subsequently reinstated and reissued

in 2018. She completed her undergraduate studies in 2022 and she started her graduate studies as of January 1, 2024, and she has had her F-1 status continuously since that time.

42. She currently has a 3.42 grade point average.

43. Ms. Liu has never committed any criminal offenses and has complied with all the rules and regulations imposed on a person with F-1 status.

44. Ms. Liu remains a student in good standing at Indiana University Indianapolis.

45. Nevertheless, on April 11, 2025, she received an email from the Director of International Student and School Services at Indiana University Indianapolis that states that:

A recent review of student records brought to our attention that your SEVIS record and lawful F-1 status in the United States was terminated yesterday, by the U.S. Department of Homeland Security. The reason for the termination listed in SEVIS is, 'OTHERWISE FAILING TO MAINTAIN STATUS – Individual identified in criminal records check and/or has had their VISA revoked. SEVIS record has been terminated.' The government has provided no further information about the reason for the termination of your F-1 SEVIS record.

If you are currently employed, you are advised to cease employment immediately.

This email is attached as Exhibit 1.

46. No further notice or explanation has been given for the termination of her F-1 status and her SEVIS record and she has received no notice from DHS or any other agency of the United States.

47. Ms. Liu has no criminal record and there is no lawful basis for the termination of her SEVIS record and the resulting termination of her F-1 status, and none of the bases for termination of status articulated in 8 C.F.R. § 214.1(d) are applicable to her.

48. Ms. Liu has no recourse to challenge the termination of her lawful F-1 status and SEVIS record.

49. This termination is extremely problematic for Ms. Liu as she may never be able to complete her studies if she loses her F-1 status. Moreover, she is currently receiving medical care that may not be available to her if she is removed and returns to China.

50. She is now extremely nervous about her future. This is extremely disconcerting and has greatly exacerbated mental health conditions that she has.

Nina Hu

51. Nina Hu is a sophomore at Purdue University in West Lafayette, Indiana.

52. Ms. Hu is a Chinese national, although she was born in Ukraine.

53. She came to the United States to attend Purdue in 2023.

54. She is majoring in Computer Science and Data Science, with a minor in Business Economics.

55. She receives excellent grades.

56. She intends to pursue a career involving computer science upon graduation and is also contemplating going to law school.

57. Ms. Hu received F-1 status in 2023 and has had this status continuously without interruption since that time.

58. Ms. Hu has never committed a criminal offense and has complied with all the rules and regulations imposed on a person with F-1 status.

59. Ms. Hu remains a student in good standing at Purdue University.

60. Nevertheless, on April 3, 2025, she received an email from the Director of International Student Services at Purdue that stated that “[i]t has come to our attention that your SEVIS record and lawful F-1 status in the United States have been terminated.” The notice further provides that if she is employed, she must immediately cease her employment. The notice is attached as Exhibit 2.

61. Ms. Hu is not currently employed, but had been hired for a job at Purdue University this summer.

62. No further explanation has been given for the termination of her F-1 status and her SEVIS record and she has received no notice from DHS or any other agency of the United States.

63. There is no lawful basis for the termination of her SEVIS record and the resulting termination of her F-1 status, and none of the bases for termination of status articulated in 8 C.F.R. § 214.1(d) are applicable to her.

64. Ms. Hu has no recourse to challenge the termination of her lawful F-1 status and SEVIS record.

65. Ms. Hu has paid \$15,000 for this semester to Purdue for her studies and still owes \$5,000.

66. This termination is devastating to Ms. Hu as she will not be able to complete her studies and places her in the situation where she is subject to immediate detention and deportation. She is terrified of this possibility.

Junde Zhu

67. Junde Zhu is currently a junior at Purdue University in West Lafayette studying National Resources and Environmental Science with an expected graduation date in May of 2026.

68. Mr. Zhu is a citizen of China who received F-1 status in 2022 and has had this status continuously since that time.

69. Mr. Zhu is taking a full caseload and plans upon pursuing a Master's Degree in the United States in Environmental Science upon graduation.

70. Mr. Zhu is a student in good standing at Purdue.

71. Nevertheless, on April 9, 2025, he received a notice from the Director of International Services at Purdue that states:

It has come to our attention that your SEVIS record and F-1 status in the United States have been terminated. Your SEVIS record and F-1 status were terminated on 4/8/2025 for the reason: **OTHER- Individual identified in criminal records check and/or has had their VISA revoked.**

The notice is attached as Exhibit 3.

72. In 2024 Mr. Zhu pled guilty to a non-traffic citation for disorderly conduct for which he received a fine and had to pay restitution. This was in Pennsylvania.

73. This is the only offense for which he has been convicted. It is not an offense that allows for termination or loss of his F-1 status.

74. Since receiving the April 9, 2025 notice he received a notice from the United States Department of State, Bureau of Consular Affairs Visa Office stating that his F-1 visa had been revoked under Section 221(i) of the United States Immigration and Nationality Act, and that “[r]emaining in the United States without a lawful immigration status can result in fines, detention, and/or deportation. It may also make you ineligible for a future U.S. visa.” It also warned that “[p]ersons being deported may be sent to countries other than their countries of origin.” On information and belief this notice is because of the termination of his F-1 status in his SEVIS record. The notice is attached as Exhibit 4.

75. There is no lawful basis for the termination of his SEVIS record and the resulting termination of his F-1 status, and none of the bases for termination of status articulated in 8 C.F.R. § 214.1(d) are applicable to him.

76. Mr. Zhu has no recourse to challenge the termination of his lawful F-1 status and SEVIS record.

77. The termination of his F-1 status and SEVIS will render him unable to finish and continue his education as planned and will prevent or affect his ability to return to the United States.

78. Mr. Zhu has paid \$15,552 to attend Purdue this semester.

79. He lives in constant and continuing fear of being arrested and removed to an unknown country.

Xiaotian Yu

80. Xiaotian Yu is currently studying for a Master's Degree at Purdue University in West Lafayette.

81. He is a citizen of China.

82. He is scheduled to graduate in May of 2025 with a graduate degree in Aerospace/Aviation.

83. He has a 3.8 grade point average.

84. He received his current F-1 status in July of 2024. He had a prior F-1 visa and F-1 status beginning in 2017.

85. In 2022 he was charged with domestic violence in Illinois. However, the case was dismissed and there was no conviction.

86. Mr. Yu has not been convicted of any offenses.

87. Mr. Yu is a student in good standing at Purdue University.

88. On April 9, 2025, he received a notice from the Director of International Services at Purdue that states:

It has come to our attention that your SEVIS record and F-1 status in the United States have been terminated. Your SEVIS record and F-1 status were terminated on 4/8/2025 for the reason: **OTHER - Individual identified in criminal records check and/or has had their VISA revoked.**

The notice is attached as Exhibit 5.

89. There is no lawful basis for the termination of his SEVIS record and the resulting termination of his F-1 status, and none of the bases for termination of status articulated in 8 C.F.R. § 214.1(d) are applicable to him.

90. Mr. Yu has no recourse to challenge the termination of his lawful F-1 status and SEVIS record.

91. The termination of his visa and SEVIS will render him unable to finish and continue his education as planned. He is now living in fear that he will be arrested and removed to an unknown country.

Xilai Dai

92. Mr. Dai is in the first year of a Ph.D program in chip design at Purdue University in West Lafayette.

93. He is a student in good standing at Purdue and received his undergraduate degree in Computer Engineering at Purdue in 2023.

94. He is a citizen of China.

95. He received an F-1 visa in 2019. In the summer of 2024, he returned home to China and applied to renew the VISA so he could return to school in West Lafayette. He inadvertently failed to disclose on his application that he had been arrested in Tippecanoe County in 2022 for underage consumption of alcohol, as the charge was dismissed. After

an initial denial of the VISA, he reapplied and disclosed the arrest and the VISA was approved and renewed.

96. The only other arrests or citations that he has received is a citation for a speeding ticket in December of 2024 for which he has received a deferral for one year after which the matter will be closed.

97. On April 9, 2025, he received a notice from the Director of International Services at Purdue that states:

It has come to our attention that your SEVIS record and F-1 status in the United States have been terminated. Your SEVIS record and F-1 status were terminated on 4/8/2025 for the reason: **OTHER - Individual identified in criminal records check and/or has had their VISA revoked.**

If you are currently employed, you are advised to cease employment immediately, and you are no longer legally authorized to continue your studies in the United States.

The notice is attached as Exhibit 6.

98. On April 9, he also received an email from the United States Embassy in Beijing that “additional information became available after your visa issued. As a result, your F-1 visa with expiration date 14-JUL-2025 has been revoked under Section 221(i) of the United States Immigration and Nationality Act.” On information and belief this “additional information” refers to the termination of his F-1 status in his SEVIS record.

The email is attached as Exhibit 7.

99. The Embassy notice also states that remaining in the United States subjected Mr. Dai to fines, detention, and/or deportation. It further states that “deportation can take

place at a time that does not allow the person being deported to secure possessions or conclude affairs in the United States. Persons being deported may be sent to countries other than their countries of origin.”

100. Mr. Dai’s sole income has been from teaching classes at Purdue and he was scheduled to be a paid research assistant at Purdue this summer. However, now that his F-1 status has been revoked, he is unable to be employed and has no income.

101. There is no lawful basis for the termination of hi SEVIS record and the resulting termination of his F-1 status, and none of the bases for termination of status articulated in 8 C.F.R. § 214.1(d) are applicable to him.

102. Mr. Dai has no recourse to challenge the termination of his lawful F-1 status and SEVIS record.

103. The termination of his F-1 status and SEVIS record will render him unable to finish and continue his education as planned. He is now living, without income, in fear that he will be picked up and deported to an unknown country.

Zhaorui Ni

104. Zhaorui Ni is currently a doctoral student in Computer Engineering at Purdue University in West Lafayette.

105. She is a student in good standing at Purdue.

106. She is a citizen of China.

107. She has had her F-1status since 2019.

108. On April 9, 2025, she received a notice from the Director of International Services at Purdue that states:

It has come to our attention that your SEVIS record and F-1 status in the United States have been terminated. Your SEVIS record and F-1 status were terminated on 4/8/2025 for the reason: **OTHER - Individual identified in criminal records check and/or has had their VISA revoked.**

If you are currently employed, you are advised to cease employment immediately, and you are no longer legally authorized to continue your studies in the United States.

The notice is attached as Exhibit 8.

109. Ms. Ni has been employed as an instructor at Purdue and was scheduled to be employed by Purdue this summer as either an instructor or researcher. However, because of the revocation of her F-1 status her employment has ceased. This was her only income.

110. The only criminal history that Ms. Ni has are 1) misdemeanor charges for criminal trespass and resisting law enforcement that were filed in June of 2024. She has entered to a diversion concerning these charges and pursuant to the diversion agreement they are scheduled to be dismissed in December of 2025 if she fully complies with the terms of the diversion of the agreement, which she believes she has done and 2) a speeding ticket which was deferred and has been fully resolved.

111. There is no lawful basis for the termination of her SEVIS record and the resulting termination of her F-1 status, and none of the bases for termination of status articulated in 8 C.F.R. § 214.1(d) are applicable to her.

112. Ms. Ni has no recourse to challenge the termination of her lawful F-1 status and SEVIS record.

113. The termination of her F-1 status and SEVIS record will render her unable to continue and complete her education. It has caused her to lose her income. Moreover, it has caused immense worry and emotional harm as she must live with the knowledge that with the termination of her F-1 status she can be detained and removed. This is difficult to live with.

Jideofor Odoeze

114. Jideofor Odoeze is a citizen of Nigeria who is enrolled at Notre Dame.

115. He is a student in good standing and is currently studying for a Ph.D in Electrical Engineering with an expected graduation date of May of 2025.

116. He is a finalist for receiving a National Science Foundation Entrepreneurial Fellowship and is expecting to learn in the near future if this has been awarded.

117. The fellowship specifically aims to support scientists and engineers in translating their research into new products and services with broad societal benefits and fellows receiving training, funding, access to research facilities, and mentoring.

118. He initially received an F-1 visa in 2018 and after visiting Nigeria and before returning to the United States he received a new F-1 visa in 2022 and has had F-1 status since that time.

119. He is married and his wife is a dependent of his F-1 visa.

120. He and his wife have two young children who are both United States citizens.

121. On April 8, 2025, he received an email from the Executive Director of the International Student & Scholar Affairs at Notre Dame informing him that DHS had terminated his SEVIS immigration record. The reason given for this termination is “OTHER - Individual identified in criminal records check and/or has had their VISA revoked. SEVIS record has been terminated.”

122. The email further states that “based on this DHS action to your record, your F-1 status in the U.S. is terminated, and you are no longer considered lawfully present in the U.S. Additionally, you may be at risk of detention and deportation.” It further provides that “if you are still present in the U.S., you should make immediate plans to depart United States. There is no grace period with this termination.”

123. The email is attached as Exhibit 9.

124. The termination of his F-1 status automatically terminates his wife’s F-2 visa.

125. Mr. Odoeze has been employed by Notre Dame. That is the only income in the family and that has now stopped with the termination of his F-1 status.

126. In 2024, Mr. Odoeze was charged with domestic battery and disorderly conduct. However, the domestic battery charge was dismissed and Mr. Odoeze pled guilty to the disorderly conduct charge as a B-misdemeanor and he was only assessed fees. He has also been charged with speeding as an infraction, but has been told by the judge in the

case that the charge will be dismissed on April 22, 2025 if there have been no further citations. He has not received any further citations.

127. There is no lawful basis for the termination of his SEVIS record and the resulting termination of his F-1 status, and none of the bases for termination of status articulated in 8 C.F.R. § 214.1(d) are applicable to him.

128. Mr. Odoeze has no recourse to challenge the termination of his lawful F-1 status and SEVIS record. Indeed, the email that he received from Notre Dame states that “we are unaware of any available path to reinstate your status from within the U.S.”

129. The termination of his SEVIS record and F-1 status will make it unable for him to finish his education and has deprived him and his family of all income. He is currently buying a house and risks losing everything. He is a finalist for the National Science Award, and will not be able to receive it due to his loss of status. He is now forced to live with the fact that he and his wife are subject to removal at any time. Although his young children (two and four years of age) are American citizens, they are facing profound disruption of their lives. This has all caused an enormous amount of worry and concern.

Concluding allegations

130. Plaintiffs are being caused irreparable harm for which there is no adequate remedy at law.

Legal claims

131. Defendants' termination of the plaintiffs' SEVIS immigration records and the termination of their F-1 statuses represents final agency action and was without statutory or regulatory authority in violation of the Administrative Procedure Act, 5 U.S.C. § 706(2)(A), (B) as it is arbitrary, capricious, and "contrary to constitutional right, power, privilege or immunity."

132. Defendants' termination of the SEVIS immigration records and the termination of their F-1 status without adequate notice and the opportunity to meaningfully challenge the termination violates due process.

Request for relief

WHEREFORE, plaintiffs request that this Court:

- a. assume jurisdiction of this case and set it for hearing at the earliest opportunity;
- b. enter a declaratory judgment that the actions of the defendants are unlawful for the reasons noted above;
- c. enter a preliminary injunction, later to be made permanent, enjoining defendants
 - i. from detaining plaintiffs until this matter is resolved and enjoining defendants to immediately reinstate plaintiffs' F-1 student status;
 - ii. enjoining defendants to provide adequate notice and the opportunity to be heard if defendants attempt to terminate their F-1 status and SEVIS immigration records;
- j. award plaintiffs their reasonable costs and attorneys' fees pursuant to 28 U.S.C. § 2412 as the defendants' actions in this case are not substantially justified;

k. award all other proper relief

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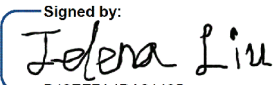
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Attorneys for Plaintiffs

Verification

I verify under penalty of perjury that the foregoing statements that concern me are true and correct.


Date: 4/14/2025 | 2:03 PM EDT

Signed by:

B49EE7A4DA91405...
Jelena Liu

Verification

I verify under penalty of perjury that the foregoing statements that concern me are true and correct.

Date: 4/14/2025 | 1:49 PM EDT

签署人：

B5B7D28FF4534A4...
Nina Hu

Verification

I verify under penalty of perjury that the foregoing statements that concern me are true and correct.


Date: 4/14/2025 | 12:59 PM EDT _____

Signed by: 
10BF9BB392CF4DD... _____
Junde Zhu

Verification

I verify under penalty of perjury that the foregoing statements that concern me are true and correct.


Date: 4/14/2025 | 12:36 下午 EDT

签署人：

EB5AA74D745E425...
Xiaotian Yu

Verification

I verify under penalty of perjury that the foregoing statements that concern me are true and correct.


Date: 4/14/2025 | 12:35 PM EDT

Signed by:

C6E42C3953584B8...
Xilai Dai

Verification

I verify under penalty of perjury that the foregoing statements that concern me are true and correct.

Date: 4/14/2025 | 12:33 PM EDT

Signed by:

5EE7A04BDAAF4D9...
Zhaorui Ni

Verification

I verify under penalty of perjury that the foregoing statements that concern me are true and correct.

Date: 4/14/2025 | 12:21 PM EDT

Signed by: 
022844905CB049E...
Jideofor Odoeze