

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

**AHWAR SULTAN, et al.,**

**Plaintiffs,**

**v.**

**DONALD J. TRUMP, President of the  
United States, et al.,**

**Defendants.**

**Civil Action No. 25-1121 (TSC)**

**MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to Federal Rule of Civil Procedure 65, Plaintiffs Ahwar Sultan and Students for Justice in Palestine at The Ohio State University ("SJP"), by and through undersigned counsel, respectfully move this Court for a preliminary injunction against Defendants Donald J. Trump, Marco Rubio, and their agents, employees, successors, and any other person acting for the following relief:

1. **Restoration of Immigration Status:** Directing Defendants to immediately restore and maintain Plaintiff Ahwar Sultan's F-1 student visa status, including returning his SEVIS (Student and Exchange Visitor Information System) record to "active" status, and to ensure that he remains in lawful student status for the duration of this litigation.
2. **Enjoin Retaliatory Visa Actions:** Preliminarily enjoining Defendants, their officers, agents, and all persons acting in concert with them, from enforcing or implementing the visa termination, Student Criminal Alien Initiative, or any related policy against Plaintiffs in a manner that penalizes or targets them for engaging in protected First Amendment activity. This includes prohibiting Defendants from again terminating Plaintiff Sultan's visa

or initiating removal proceedings against him solely on the basis of his participation in lawful protests and associations and likewise prohibiting any adverse immigration action against the Plaintiff organization (Students for Justice in Palestine at The Ohio State University) or its members on the basis of their protected speech or political associations.

3. **Maintain the Status Quo:** Restraining Defendants from taking any steps to remove, deport, or otherwise retaliate against Plaintiff Sultan as a result of the now-rescinded visa status or his political activities, thereby preserving the status quo and ensuring that Plaintiff can continue his studies and advocacy without fear of imminent harm while this case is pending.
4. **Further Relief as Just and Proper:** Granting such other and further relief as the Court deems just and proper to fully protect Plaintiffs' rights and to effectuate the Court's order.

Dated: Brooklyn, NY

May 9, 2025

Respectfully submitted,

/s/ Rafael Urena

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