

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

Rümeysa Öztürk,

Plaintiff,

v.

PATRICIA HYDE, Acting Director of
Boston Field Office, United States
Immigration and Customs Enforcement,
TODD LYONS, Acting Director United
States Immigration and Customs
Enforcement, and KRISTI NOEM, Secretary
of Homeland Security,

Defendants.

Civil Action No. 1:25-cv-12334-DJC

JOINT STATEMENT REGARDING SCHEDULE FOR FURTHER PROCEEDINGS

In response to the Court's September 19, 2025 order requiring the parties to file a joint statement and proposed schedule for addressing the plaintiff's SEVIS claim, the parties report that they have attempted to resolve the issues in this case without the need for litigation, but have been unsuccessful. Accordingly, the parties jointly propose the below schedule for litigation of plaintiff's anticipated motion for preliminary injunctive relief. Plaintiff, through this filing, also requests leave to file a reply brief, to which defendants assent.

- Plaintiff will file a motion for preliminary injunctive relief by October 17, 2025.

- Defendants will file their opposition by October 31, 2025.¹
- Plaintiff will file any reply by November 7, 2025.
- The parties are available for a hearing on the motion the weeks of November 10 and 17, 2025, or at a time convenient for the Court.

Date: October 3, 2025

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¹ Defendants' statement: At the end of the day on September 30, 2025, the appropriations act that had been funding the Department of Justice expired and appropriations to the Department lapsed. Absent an appropriation, Department of Justice attorneys are prohibited from working, even on a voluntary basis, except in very limited circumstances, including "emergencies involving the safety of human life or the protection of property." 31 U.S.C. § 1342. If funding is not restored by Congress by October 17, 2025, Defendants will either seek an extension of time to respond to Plaintiff's motion or a stay of the proceedings. Plaintiff's statement: Plaintiff reserves the right to oppose a request for extension of time or for a stay of proceedings.

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