

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

RÜMEYSA ÖZTÜRK,
Plaintiff,

v.

PATRICIA HYDE, et al.,
Defendants.

No. 1:25-cv-12334-DJC

PLAINTIFF’S MOTION FOR PRELIMINARY INJUNCTIVE RELIEF

Pursuant to Federal Rule of Civil Procedure 65, Plaintiff Rümeysa Öztürk moves for preliminary injunctive relief requiring Defendants to reactivate Ms. Öztürk’s Student & Exchange Visa Information System (SEVIS) record and to restore it *nunc pro tunc* from the date of termination to avoid any gaps in the record.

REQUEST FOR ORAL ARGUMENT

Given the broad consensus of courts that have addressed the legal issues raised in this motion and granted relief to noncitizen plaintiffs whose SEVIS records were terminated, *see, e.g., Mohd v. DHS*, No. 2:25-cv-2183, 2025 WL 2112425, at *10 n.18 (E.D.N.Y. July 28, 2025) (collecting cases); *Doe #1 v. Noem*, No. 3:25-cv-00042, 2025 WL 1203472, at *5 n.1 (S.D. Iowa Apr. 24, 2025) (collecting cases and noting “overwhelming majority” of decisions granting preliminary relief), plaintiff does not request oral argument to the extent the Court is prepared to grant preliminary injunctive relief without argument.

Dated: October 17, 2025

Respectfully submitted,

/s/Adriana Lafaille

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LOCAL RULE 7.1(A)(2) CERTIFICATION

I hereby certify that counsel for Plaintiff conferred with counsel for Defendants in a good-faith effort to narrow or resolve the relief requested. Defendants oppose this motion.

Date: October 17, 2025

/s/Adriana Lafaille
Adriana Lafaille