

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

JELENA LIU,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	No. 1:25-cv-716-JPH-TAB
	)	
KRISTI NOEM, <i>et al.</i> ,	)	
	)	
Defendants.	)	

**Motion for Preliminary Injunction**

Plaintiff, by counsel, moves this Court for a preliminary injunction in this matter.

In support of this motion, she says that:

1. At the current time she is facing severe and irreparable harm because defendants have unlawfully terminated her F-1 student status.
2. The actions of the defendants violate both the Administrative Procedure Act, 5 U.S.C. § 706(2)(A), (B) and the due process clause of the Fifth Amendment to the United States Constitution.
3. The irreparable harm that plaintiff is being caused and is facing in the future far outweighs any harm that a preliminary injunction will cause the defendants.
4. The public interest will be served by the issuance of a preliminary injunction.
5. In support of this Motion she is separately submitting her memorandum of law, which is also incorporated by reference.

6. Plaintiff also submits the following materials, attached to this Motion and referenced in the separately submitted brief:

- a. Second affidavit of Angela D. Adams
- b. TRO issued April 14, 2025, *Kshatri v. Lyons*, 2:25-cv-553-MHH (S.D. Ala.)
- c. TRO issued April 15, 2025, *Arizona Student DOE #2 v. Trump et al.*, 4:25-cv-175-TUC-AMM (D. Ariz.)
- d. TRO issued April 15, 2025, *Zhou v. Lyons*, 2:25-cv-2994 (C.D. Cal.)
- e. TRO issued April 17, 2025, *Student Doe v. Noem et al.*, 2:25-cv-1103-DAD-AC (E.D. Cal.)
- f. TRO issued April 16, 2025, *Hinge v. Lyons*, 1:25-cv-1097-RBW (D.D.C.) (only docket text accessible)
- g. TRO issued April 18, 2025, *Jane Doe 1 et al. v. Bondi et al.*, 1:25-cv-1998-VMC (N.D. Ga.)
- h. TRO issued April 15, 2025, *Doe v. Noem et al.*, 1:25-cv-10904-PBS (D. Mass.) (only docket text accessible)
- i. TRO issued April 11, 2025, *Zheng v. Lyons*, 1:25-cv-10893-FDS (D. Mass.)
- j. TRO issued April 15, 2025, *Ratsantiboon v. Noem et al.*, 0:25-cv-1315-JMP-JFD (D. Minn.)
- k. TRO issued April 15, 2025, *Roe et al. v. Noem et al.*, 2:25-cv-40-DLC (D. Mont.)
- l. TRO issued April 10, 2025, *Liu v. Noem et al.*, 1:25-cv-133-SE-TSM (D.N.H.)
- m. TRO issued April 11, 2025, *Wu et al. v. Lyons*, 1:25-cv-1979-NCM (E.D.N.Y.)
- n. TRO issued April 17, 2025, *Patel v. Bondi et al.*, 1:25-cv-101-SPB-WSH (W.D. Pa.)
- o. TRO issued April 17, 2025, *Doe v. Noem et al.*, 2:25-cv-633-DGE (W.D. Wash.)
- p. TRO issued April 15, 2025, *Isserdasani et al v. Noem et al.*, 3:25-cv-283-WMC (W.D. Wisc.)
- q. Affidavit of Jelena Liu

WHEREFORE, plaintiff requests that this Court enter a preliminary injunction ordering defendants to take all steps to restore her F-1 status retroactive to the date of its unlawful termination, and for all other proper relief.

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