UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

MATTHEW ARIWOOLA,

Plaintiff,

v.

KRISTI NOEM, in her official capacity as Secretary of Homeland Security; the DEPARTMENT OF HOMELAND SECURITY; and TODD LYONS, in his official capacity as Acting Director of U.S. Immigration and Customs Enforcement,

Defendants.

Case No. 3:25-cv-03313-JDA

EMERGENCY MOTION FOR TEMPORARY RESTRAINING ORDER

INTRODUCTION

Plaintiff Matthew Ariwoola is an international PhD student at the University of South Carolina (USC). For the last four years, he has been a valuable and engaged member of his Gamecock community. He teaches multiple classes—including four undergraduate "Introduction to Chemistry" courses—and leads important biochemical research about how to improve chemical compounds that deliver life-saving medicine within the body. Matthew is scheduled to complete his studies this December.

This week, Matthew was informed by USC officials that the U.S. government terminated his nonimmigrant status and that he must immediately cease his studies. He was further advised that unless he self-deports, he risks imminent arrest, detention, and deportation. The consequences extend even beyond Plaintiff himself: Matthew is losing his stipend, and with it the only way to support his family; more than one hundred USC students are losing their chemistry teacher; and the university (and the public) is losing out on potentially life-saving medical research. The U.S. government has offered no justification for its action.

Matthew is a victim of Defendants' arbitrary and capricious nationwide dragnet of nonimmigrant international students. Earlier this month, Defendants Department of Homeland Security (DHS), Secretary of Homeland Security (Kristi Noem), and Acting Director of U.S. Immigration and Customs Enforcement (ICE) started terminating the Student and Exchange Visitor Information System (SEVIS) records of hundreds of international students nationwide. As of April 18, 2025, approximately 1,550 cancellations at over 240 colleges and universities had been documented.[1] So far, Defendants have yet to explain the purpose of their actions. Throughout the federal judiciary, motions for emergency relief have been sought and granted on behalf of impacted students.

Emergency relief is essential to avoiding irreparable harm during the pendency of this case. Matthew doesn't have five million dollars to buy his way into President Trump's good graces,[2] so the termination of his SEVIS record—and the resulting loss of his nonimmigrant status—means he faces the risk of immediate arrest and deportation. Unwilling to fall victim to this blatantly arbitrary and unlawful termination of his F-1 student status, Plaintiff filed the Complaint, ECF No. 1, and this emergency motion. To avoid irreparable harm, Plaintiff hereby seeks the immediate restoration of his F-1 student status and an order prohibiting Defendants or their agents from arresting, detaining, or transporting him outside of this jurisdiction. Given that Defendants have announced no basis for their action, it stands to reason that they cannot be harmed by the Court enjoining those actions.[3]

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[1] Laim Knox, *Student Visa Dragnet Reaches Small Colleges*, Inside Higher Ed (April 8, 2025), https://www.insidehighered.com/news/global/international-students-us/2025/04/08/trump-admin-broadens-scope-student-visa (accessed April 18, 2025).

[2] Ryan Mac & Hamed Aleaziz, *Musk's Team Is Building a System to Sell 'Gold Card' Immigrant Visas*, N.Y. TIMES (Apr. 16, 2025), https://www.nytimes.com/2025/04/16/us/politics/gold-card-visa-trump-musk.html.

[3] This motion is not accompanied by a separate memorandum of law because a full explanation of the motion is contained herein. *See* Local Civ. R. 7.04, 7.05.

FACTUAL BACKGROUND

I. F-1 Student Status

Under the Immigration and Nationality Act (INA), noncitizens can enroll in government-approved academic institutions as F-1 students. *See* 8 U.S.C. § 1101(a)(15)(F). Admitted students living abroad enter the United States on an F-1 visa issued by the U.S. Department of State, and once they enter, they are granted F-1 student status and generally permitted to remain in the United States for the duration of their program as long as the they continue to meet the requirements established by the regulations governing the F-1 classification in 8 C.F.R. § 214.2(f), such as maintaining a full course of study and avoiding unauthorized employment. The F-1 student *visa* is distinct from F-1 student *status*: the F-1 student visa refers only to the document noncitizen students receive to enter the United States, whereas F-1 student status refers to students' formal immigration classification in the United States once they enter the country.

Immigrations and Customs Enforcement (ICE), a subdivision of the Department of Homeland Security (DHS), administers the F-1 student program through its Student and Exchange Visitor Program (SEVP) and tracks information on students with F-1 student status using the Student and Exchange Visitor Information System (SEVIS). Host schools also use SEVIS to track and document the continuing status of students who are authorized to be in the United States to study pursuant to an F-1 visa or other study-related visas

Termination of F-1 student status in SEVIS is governed by SEVP regulations. 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." *See* 8 C.F.R. § 214.2(f). Students fail to maintain their F-1 student status when they do not comply with the regulatory requirements of F-1 status, such as failing to maintain a full course of study without prior approval, engaging in unauthorized employment, or other violations of the 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 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." Schools must report to SEVP, via SEVIS, when a student fails to maintain status. *See* 8 C.F.R. § 214.3(g)(2).

On the other hand, DHS's ability to initiate the termination of F-1 student status "is limited by [8 C.F.R.] § 214.1(d)." *Jie Fang v. Director U.S. Immigration & Customs Enforcement*, 935 F.3d 172, 185 n.100 (3d Cir. 2019). Under this regulation, DHS can terminate F-1 student status under the SEVIS system *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. *See* 8 C.F.R. § 214.1(d).

II. Matthew Ariwoola

Matthew Ariwoola is a PhD student at the University of South Carolina. Ex. 1 (Plaintiff Declaration) at ¶ 1. He has studied chemistry at USC since 2021, researching more efficient ways for compounds to deliver medication in the body. *Id.* at ¶¶ 1, 6. Matthew renewed his F-1 visa in 2023 and was admitted into the United States for "D/S" (the duration of his stay). *Id.* at ¶ 2. Matthew teaches over one hundred undergraduates in Introduction to Chemistry and is only months away from his scheduled graduation in December 2025. *Id.* at ¶¶ 4–5, 7. He has not participated in any protests, and he has never been convicted of a crime. *Id.* at ¶ 10. To his (and the university's) knowledge, Matthew has complied with all requirements of F-1 student status. *See id.* at ¶ 3.

On April 8, 2025, school officials notified Matthew that he was one of several USC students whose SEVIS record was terminated. *See id.* at ¶ 8. As a result, Matthew was instructed to cease his research and stop teaching his classes. *Id.* USC made similar demands of other impacted students. *See* Ex 2 (instructing another student whose SEVIS record was terminated to "depart the United States as soon as possible because you no longer have legal status in the United States"). As other courts have explained, federal law *requires* schools to remove students

whose SEVIS records are terminated. *See Liu v. Noem*, No. 25-cv-133-SE, Dkt. 13 at *3–4 (D.N.H. April 10, 2025) (finding that when a student's SEVIS record is terminated, the school "must require [the student] to disenroll from his current courses so that [the school] can remain in compliance with federal law"). Prior to being removed from his courses and research, Matthew received no additional notice from the school and no notice from the federal government whatsoever. The reason for his SEVIS termination was listed as "OTHER – Individual identified in criminal records check and/or has had their VISA revoked. SEVIS record has been terminated." *See* ECF No. 1 (Complaint) at ¶ 4. Matthew has no criminal record. Ex. 1 at ¶ 10. In 2023, he was arrested for charges out of Georgia, despite having never been there. *Id.* at ¶ 11. Those charges were voluntarily dismissed by the prosecutor. *Id*.

Matthew is devastated at the prospect of his opportunity to obtain a PhD in the United States evaporating before his eyes.

STANDARD OF REVIEW

"The standard for a temporary restraining order is the same as a preliminary injunction." *Maages Auditorium v. Prince George's Cnty.*, 4 F. Supp. 3d 752, 760 n.1 (D. Md. 2014), aff'd, 681 F. App'x 256 (4th Cir. 2017). Plaintiff "must establish [1] that he is likely to succeed on the merits, [2] that he is likely to suffer irreparable harm in the absence of preliminary relief, [3] that the balance of equities tips in his favor, and [4] that an injunction is in the public interest." *Winter v. Nat. Res. Def. Council, Inc.*, 555 U.S. 7, 20 (2008).

ARGUMENT

Defendants' termination of Plaintiff's F-1 student status under the SEVIS system was unlawful for two independent reasons: first, it violates the Due Process Clause of the Fifth Amendment under the Constitution (Count 1); and second, it violates the Administrative Procedure Act, 5 U.S.C. § 706(2)(A) as arbitrary, capricious, an abuse of discretion, and otherwise not in accordance with the law, including the regulatory regime at 8 C.F.R. § 214.1(d). *See, e.g.*, *Isserdasani v. Noem*, No. 3:25-cv-00283-wmc, Dkt. 7 at *9–10 (W.D. Wisc. April 15,

2025) (holding that plaintiff demonstrated a substantial likelihood of success on his APA claim, and was entitled to TRO, where his "SEVIS record [was] terminated for an arrest on a misdemeanor disorderly conduct charge, which was quickly dropped altogether by the charging authority.").

Recognizing the critical necessity of emergency relief, courts across the country have issued TROs in similar cases. *See* Ex. 3 (*C.S. v. Noem,* No. 2:25-cv-00477-WSS, Doc. 22 (W.D. Penn. Apr. 15, 2024)); Ex. 4 (*Roe v. Noem,* No. 2:25-cv-00040-DLC, Doc. 11 (D. Mont. Apr. 15, 2025)); Ex. 5 (*Doe v. Trump,* No. 4:25-cv-00175-AMM, Doc. 7 (D. Ariz. Apr. 15, 2025)); Ex. 6 (*Hinge v. Lyons,* No. 1:25-cv-01097-RBW, Doc. 11 (D.D.C. Apr. 15, 2025)); Ex. 7 (*Rantsantiboom v. Noem,* No. 0:25-cv-01315-JMB-JFD, Doc. 20 (D. Minn. Apr. 15, 2025)); Ex. 8 (*Wu v. Lyons,* No. 1:25-cv-01979-NCM, Doc. 9 (E.D.N.Y. Apr. 11, 2025)); Ex. 9 (*Zheng v. Lyons,* No. 1 :25-cv-10893-FDS, Doc. 8 (D. Mass. Apr. 11, 2025)); Ex. 10 (*Liu v. Noem,* No. 25-cv-133-SE, Doc. 13 (D.N.H. April 10, 2025)). Plaintiff asks that this Court do the same.[4]

I. Plaintiff is likely to succeed on the merits of his claims that the termination of his F-1 student status via SEVIS was unlawful.

Defendants' termination of Plaintiff's F-1 student status in SEVIS was unlawful for two independent reasons: first, it violates the Due Process Clause of the Fifth Amendment, U.S. Const. amend. V (Count 1); and second, it violates the Administrative Procedure Act (APA), 5 U.S.C. § 706(2)(A) as arbitrary, capricious, an abuse of discretion, and otherwise not in accordance with the law, including the regulatory regime at 8 C.F.R. § 214.1(d).

A. Due Process

Defendants' termination of Plaintiff's F-1 student status straightforwardly violates the Fifth Amendment's Due Process Clause. As an admitted noncitizen student already in the United

[4] Undersigned counsel notified Brook Andrews, acting U.S. Attorney for the District of South Carolina, and William Jordon, the civil chief in that office, about Plaintiff's requested relief by email on April 18, 2025, at 3:31pm. As of the filing of this motion, counsel has not yet received a response.

States, Plaintiff has due process rights. *Zadvydas v. Davis*, 533 U.S. 678, 693 (2001) ("[t]he Due Process Clause applies to all 'persons' within the United States, including aliens, whether their presence here is lawful, unlawful, temporary, or permanent."); *see also Demore v. Kim*, 538 U.S. 510, 523 (2003) ("It is well established that the Fifth Amendment entitles aliens to due process of law in deportation proceedings."). "The essence of due process is the requirement that a person in jeopardy of serious loss be given notice of the case against him and opportunity to meet it." *Mathews v. Eldridge*, 424 U.S. 319, 348 (1976) (quotation and alteration omitted). At minimum, due process requires "the decision maker [to] state the reasons for his determination and indicate the evidence he relied on." *Goldberg v. Kelly*, 397 U.S. 254, 271 (1970).

Generally, procedural due process is not required "if government officials may grant or deny [the interest] in their discretion." *Ching v. Mayorkas*, 725 F.3d 1149, 1155 (9th Cir. 2013). But, as relevant here, Defendants do *not* have unfettered discretion to terminate a person's nonimmigrant status. Rather, termination of status "is limited by" the grounds listed in 8 C.F.R. § 214.1(d). *Jie Fang*, 935 F.3d at 185 n.100. Thus, because the grounds for status termination are "couched in mandatory terms," *Ching*, 725 F.3d at 1155, Plaintiff's "constitutional challenge cannot be answered by an argument that [the interests asserted] are a privilege and not a right." *Goldberg*, 397 U.S. at 262 (discussing procedural due process owed to welfare beneficiaries); *see cf. J.M.O. v. United States*, 3 F.4th 1061, 1064 (8th Cir. 2021) (holding that Mexican national could not assert a "constitutionally protected liberty interest in *discretionary relief*") (emphasis added); *S.N.C. v. Sessions*, No. 18-cv-7680-LGS, 2018 WL 6175902, *6 (S.D.N.Y. Nov. 26, 2018) ("Petitioner has raised substantial claims as to whether she has a protectable [due process] interest in having her application for T Nonimmigrant Status adjudicated.").

In this case, Defendants failed to satisfy the most basic demands of due process. Defendants provided *no* notice to Plaintiff or his school about the decision to terminate Plaintiff's F-1 student status. Instead, Plaintiff learned about his status termination only because his schools discovered it during an inspection of SEVIS records. *See* Ex. 1 at ¶ 8. Moreover,

Defendants recorded a vague boilerplate reason for Plaintiff's F-1 student status in SEVIS: "OTHER – Individual identified in criminal records check and/or has had their VISA revoked. SEVIS record has been terminated." Ex. 1 at ¶ 9. This brief boilerplate language cannot satisfy the requirements of the Due Process Clause for the simple reason that none of its (disjointed) phrases sufficiently notify Plaintiff of the basis of his termination, particularly when Plaintiff has never been convicted of a crime and has closely followed all applicable rules and regulations to maintain this F-1 student status. *See* Ex. 1 at ¶¶ 3, 10. As a result, Plaintiff is left to wonder what the basis or explanation for his status termination is. He has no meaningful opportunity to defend himself against hollow and inapplicable boilerplate charges.

Because Defendants deprived Plaintiff of his F-1 status without notice, explanation, or any opportunity to contest the deprivation, Plaintiff is likely to prevail on the merits of his Due Process Clause claim.

B. Administrative Procedure Act

As a preliminary matter, Defendants' termination of Plaintiff's SEVIS record—and, with it, his F-1 nonimmigrant status—is a final agency action which this Court has jurisdiction to review under the APA. *See Jie Fang*, 935 F.3d at 182 ("The order terminating these students' F-1 visas marked the consummation of the agency's decisionmaking process and is therefore a final order[.]"). Unlike an interlocutory agency decision, which provides an opportunity for challenging the agency's determination, the termination of a SEVIS record provides *no* opportunity for Plaintiff to challenge the agency action. And though Plaintiff could seek reinstatement of his status, that process does not review the agency's reasons for terminating his SEVIS record. Rather, it is governed by whether an applicant meets entirely distinct factors, *see* 8 C.F.R. § 214.2(f)(16)(i)(A)-(F), and requires the immigration court to *presume the validity* of the agency's decision to terminate status. Thus, the reinstatement process is no answer to Defendants' arbitrary, capricious, and unconstitutional termination of Plaintiff's SEVIS status.

Defendants' termination of Plaintiff's F-1 student status under the SEVIS system violates the Administrative Procedure Act (APA) in multiple ways: the termination of Plaintiff's F-1 student status was [1] not in accordance with law (including regulations), [2] arbitrary and capricious, and [3] contrary to a constitutional right. *See* 5 U.S.C. § 706(2).

1. Not in Accordance with Law

Defendants' termination of Plaintiff's F-1 student status was "not in accordance with law." 5 U.S.C. § 706(2)(A). A nonimmigrant student can lose F-1 status in two different ways: if he fails to maintain status (such as by failing to comply with governing regulations, 8 C.F.R. §§ 214.2(f), § 214.1(e)-(g)) or if DHS lawfully terminates his status. Neither happened here.

Matthew has complied with all regulations required to maintain his status. Ex. 1 at ¶ 3. For example, he has maintained a satisfactory course of study, 8 C.F.R. § 214.2(f)(6) and § 214.2(f)(16)(i)(C); has not engaged in unauthorized employment, 8 C.F.R. § 214.1(e) and § 214.2(f)(16)(i)(C); has provided "full and truthful information" to DHS, 8 C.F.R. § 214.1(f); and has not committed "a crime of violence for which a sentence of more than one year imprisonment may be imposed," 8 C.F.R. § 214.1(g). *See* Ex. 1 at ¶ 3–7, 10. In fact, Matthew has never received a traffic ticket—much less been convicted of a crime. Ex. 1 at ¶ 10.

Neither has DHS lawfully terminated his status. DHS's ability "to terminate an 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 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.[5] 8 C.F.R. § 214.1(d). None of those conditions are present. Because Defendants terminated Plaintiff's F-1 student status without a reason authorized by statute or regulation, Defendants' termination violates 5 U.S.C. §

[5] A search of the Federal Register at www.federalregister.gov on April 17, 2025, indicates that no notices have been filed in the Federal Register regarding Plaintiff.

706(2)(A) as not in accordance with the law, including 8 C.F.R. § 214.1(d).

2. Arbitrary and Capricious

Defendants' termination of Plaintiff's F-1 student status was "arbitrary [and] capricious." 5 U.S.C. § 706(2)(A). Agency action is arbitrary and capricious if the agency cannot "articulate a satisfactory explanation for its action including a rational connection between the facts found and the choice made." *Motor Vehicle Mfrs. Ass'n of U.S., Inc., v. State Farm Mut. Auto Ins. Co.*, 463 U.S. 29, 43 (1983). Here, there is no rational connection between the facts and the Government's choices. In fact, there is no connection at all: Defendants initiated a wave of F-1 student status terminations without considering Plaintiff's (or anyone else's) individual circumstances. Instead, the Government provided only a paper-thin boilerplate explanation that does not even accurately explain Plaintiff's criminal history (Plaintiff has never been convicted of a crime) or immigration status (Plaintiff's visa expired and was not revoked). Such a confounding decision is precisely the type of arbitrary and capricious agency action that the APA exists to prohibit.

3. Contrary to Constitutional Right

As explained above, Defendants failed to provide Plaintiff with adequate notice and a meaningful opportunity to be heard in violation of the Due Process Clause *See supra* Part I.A. The APA prohibits agency actions that are "contrary to constitutional right." 5 U.S.C. § 706(2)(B); *see Citizens to Pres. Overton Park, Inc. v. Volpe*, 401 U.S. 402, 414 (1971), *abrogated on other grounds by Califano v. Sanders*, 430 U.S. 99 (1977) (Section 706(2)(B) is violated "if the [agency] action failed to meet . . . constitutional requirements."); *Dep't of Com. v. New York*, 588 U.S. 752, 792 n. 5 (2019) (describing § 706(2)(B) as "addressing agency actions that violate 'constitutional' . . . requirements"). Because Defendants violated Plaintiff's constitutional right to due process of law, their termination of Plaintiff's F-1 student status also necessarily violated the APA for this separate reason.

* * *

At bottom, Defendants' termination of Plaintiff's F-1 student status violates the U.S. Constitution and the APA. Defendants provided no notice, adequate explanation, or meaningful opportunity for Plaintiff to respond. Regardless, either with or without notice, Defendants have no statutory or regulatory authority to terminate Plaintiff's F-1 student status, including under 8 C.F.R. § 214.1(d). Accordingly, Defendants acted arbitrarily, capriciously, and contrary to constitutional right—all in violation of the APA. Plaintiff is therefore likely to prevail on his claims that the termination of their F-1 student status must be set aside and enjoined.

II. Plaintiff is facing irreparable and immediate harm and will continue to do so absent emergency injunctive relief.

Plaintiff will suffer irreparable harm if Defendants' termination of his F-1 student status is not set aside and enjoined. At the outset, the violation of Plaintiff's right to due process, *see supra* Part I.A, "for even minimal periods of time, unquestionably constitutes irreparable injury.'" *Elrod v. Burns*, 427 U.S. 347, 373 (1976); *see also Leaders of a Beautiful Struggle v. Baltimore Police Dep't*, 2 F.4th 330, 346 (4th Cir. 2021). Plaintiff also currently faces the serious risk of immediate arrest and detention for deportation—"a drastic measure and at times the equivalent of banishment of exile," *Fong Haw Tan v. Phelan*, 333 U.S. 6, 10 (1948)—because he no longer has lawful status to remain in the United States. *See* ECF No. 1 (Complaint) at ¶¶ 6, 35–36.

Furthermore, as other courts have held in this setting, "[t]he loss of timely academic process alone is sufficient to establish irreparable harm." *Isserdasani*, at *10 (citing *Liu v. Noem*, No. 25-cv-133-SE, op. at *4 (D.N.H. April 10, 2025). Here, the termination of Matthew's status caused, and will continue to cause, immediate and irreparable effects on his dream of pursuing an American education. He was instantly barred from researching or teaching his classes of more than one hundred students. Ex. 1 at ¶ 8. As a result, Matthew is ineligible to receive his regular biweekly stipend and will soon be unable to pay rent or provide for his family. *Id.* at ¶¶ 13, 15–

16. Matthew's research will also suffer. *Id.* at ¶ 17. He has spent four years studying certain compounds used in medications to transport drugs to certain parts of the body. *Id.* at ¶ 6. Those compounds are often unstable, and Matthew's research explores how to make them more stable. *Id*. Currently, Matthew has invested approximately six months of work into a specific part of his research on specific compounds; however, those compounds may decompose if they are not attended to. *Id*. at ¶ 17. That would result in the loss of months of research and the waste of expensive compounds. *Id*. Only months from graduation, Defendants' actions will prevent Matthew from his years-long goal of attaining a PhD. *Id*. at 13.

III. The balance of equities and public interest strongly favor Plaintiff.

The requested emergency relief would restore Plaintiff's ability to safely remain in the United States so that he can complete his degree in December and continue his research, both of which Matthew has been working toward for four years. Additionally, it would restore Plaintiff's ability to pay for food and shelter for himself and to provide for his family.

The public benefits too. As the court noted in *Isserdasani*, "the public, which includes the taxpayers of the [state], has an overriding interest in seeing that students at the [state university] are able to be educated and obtain degrees earned with both sweat equity and tuition payments, unless there is a good reason to deny either." That interest is even more pronounced here, where Plaintiff's research into improving medication delivery within the body will benefit anyone hoping to avoid death by debilitating illness or disease.

By contrast, Defendants have advanced no substantial interest in terminating Plaintiff's F-1 student status. Given that they cannot explain the point or purpose of their actions, they also cannot state any harm that would result from enjoining those actions. Indeed, granting emergency relief would merely maintain the status quo that has been in place for the four years that Plaintiff has been in the United States as a rules-following F-1 student.

In any event, Defendants have no interest in enforcing an unconstitutional and unlawful action: the government "is in no way harmed by issuance of" injunctive relief "which prevents

the state from enforcing restrictions likely to be found unconstitutional. If anything, the system is improved by such an injunction. . . . upholding constitutional rights surely serves the public interest." *Centro Tepeyac v. Montgomery Cnty.*, 722 F.3d 184, 191 (4th Cir. 2013) (quoting *Giovani Carandola, Ltd. v. Bason*, 303 F.3d 507, 521 (4th Cir. 2002)) (internal quotation marks and citations omitted); *see also Newsom ex rel. Newsom v. Albemarle Cty Sch. Bd.*, 354 F.3d 249, 261 (4th Cir. 2003).

Thus, the balance of equities and the public interest strongly favor a temporary restraining order and preliminary injunction.[6]

CONCLUSION

For the reasons stated above, this Court should issue a temporary restraining order, followed by a preliminary injunction, as requested in Plaintiff's motion, to protect the status quo and ensure that Plaintiff is able to continue pursuing his degree and supporting his family free from the government's arbitrary and unconstitutional actions that have so abruptly upended Plaintiff's law-abiding life and studies. Plaintiff asks that the Court grant temporary relief, set a briefing schedule for a preliminary injunction, and keep that relief in place until the Court has had an opportunity to rule on the Parties' arguments regarding a preliminary injunction.

Dated: April 18, 2025

[*signatures on following page*]

[6] Based on the equities and the public interest, the Court should also exercise its discretion not to require Plaintiff to post a security bond under Fed. R. Civ. P. 65(c) in connection with the injunctive relief sought. *See South Carolina v. United States*, 329 F. Supp. 3d 214, 238 n.35 (D.S.C. 2018), *vacated on other grounds at* 912 F.3d 720 (4th Cir. 2019) ("Courts have exercised . . . discretion to set nominal bond amounts in public interest litigation. Allowing a public interest exception prevents entities from skirting judicial oversight by requesting a high security.") (citations omitted).

Respectfully submitted,

/s/ Meredith McPhail

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UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

MATTHEW ARIWOOLA,

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KRISTI NOEM, in her official capacity as Secretary of Homeland Security; the DEPARTMENT OF HOMELAND SECURITY; and TODD LYONS, in his official capacity as Acting Director of U.S. Immigration and Customs Enforcement,

Defendants.

Case No.

Declaration of Matthew Ariwoola

I, Matthew Ariwoola, am the Plaintiff in the above-captioned case and am older than eighteen years of age. Upon my personal knowledge, I hereby submit this declaration pursuant to 28 U.S.C. § 1746 and declare as follows under penalty of perjury:

1. In 2020, I came to the United States on an F-1 nonimmigrant student visa, and in 2021, I came to South Carolina to pursue a PhD in chemistry at the University of South Carolina (USC).

2. I renewed my F-1 visa in 2023 and was admitted into the United States for the duration of my F-1 student status.

3. Throughout my time studying at USC, I have complied with all rules and regulations for F-1 student status.

4. This semester, I was responsible for teaching four separate Introduction to Chemistry (CHEM 112) classes to over one hundred students total.

5. As part of my teaching responsibilities, I led classes, held office hours, and helped students through one-on-one tutoring.

6. For the past four years, I have also conducted research as part of my course of study. My research has focused on making medications more effective by stabilizing the chemical compounds that are used to carry drugs to particular sites in the body. If successful, my research will help make medications more effective and efficient.

7. I was eligible to graduate in December 2025 and had already enrolled for my final summer and fall.

8. On April 8, 2025, USC staff notified me that my SEVIS record was terminated and that, as a result, I am barred from conducting my research or teaching my classes.

9. On SEVIS, my record is listed as "TERMINATED" as of April 8, 2025. The reason for termination is listed as "OTHER – Individual identified in criminal records check and/or has had their VISA revoked. SEVIS record has been terminated."

10. I have not participated in any protest activity, and I have never been convicted of a crime.

11. My only interaction with American law enforcement occurred in 2023, when I was wrongfully arrested on a Georgia warrant for Theft By Deception, even though I had never been to Georgia. I was never required to appear in court, and the prosecution rightfully and voluntarily dismissed the case.

12. My understanding is that my SEVIS termination means that my status is cancelled. At minimum, this is functionally true because my SEVIS termination means I cannot continue my research or teaching activities, and thus cannot maintain my F-1 status.

13. Because I will not be able to maintain my F-1 status, I will lose my stipend and will not be able to graduate in December. Four years of hard work and dedication to my classes, research, and students will be lost. That loss would be devastating to me and my family.

14. I am scared that I will be arrested, detained, and put in removal proceedings.

15. Without any further stipend disbursements, I will not be able to pay next month's rent and will be homeless.

16. I am also the breadwinner for my family, including my spouse, mother, younger brother, younger sister, and baby cousin. Without further disbursements, I will not be able to provide for my family.

17. My research, which has positive implications for the medical field, will also suffer. The chemical compounds I study may decompose, which would waste the University's financial investment and six months of effort.

18. I hope I can fulfill my dream of earning a PhD here in South Carolina.

Date: 04/18/2025

Matthew Ariwoola

From: Smith, Harlan <HARLANLS@mailbox.sc.edu>
Date: Monday, April 7, 2025 at 1:25 PM
To: [redacted]
Cc: Reid, Christopher <REIDC1@mailbox.sc.edu>
Subject: SEVIS Termiantion

Dear [redacted]:

I have attached a copy of your SEVIS record below, indicating that the record is terminated and the reason for same - you will need this information when speaking to an immigration attorney.

I'm also writing to remind you of our TEAMS conversation:

1) We (the ISSS) recommend that you depart the United States as soon as possible because you no longrer have legal status in the United States.
    a. Departing on your own initiative is now called "self-deportation".
    b. Individuals who no longer have legal status are subject to arrest, detention (incarceration), and deportation by federal authorities.
2) We (the ISSS) recommend that you speak with an immigration attorney to understand the legal consequences of SEVIS termination.
    a. Larry Needle: Immigration Attorney in South Carolina | Lawrence J. Needle
3) Your CPT authorization is cancelled; please resign from your internship today.
4) Please schedule a time to meet with Chris Reid w/the ISSS. He is copied on this message.
5) You need to speak to your Program Director to determine:
    a. How to successfully complete the Spring 2025, and
    b. If you are eligible to transfer academic credits to another Program (in another country).
5)

Please know that we are here to help you as much as we can in these difficult times.

If you want Chris or I to be part of a conversation with your family about this situation, please let us know.

Warm regards,

~ Harlan @ Global Carolina ISSS

Student Information

F-1 STUDENT [redacted]	**University of South Carolina - University of South Carolina-Columbia** Start Date: [redacted]	Status: **TERMINATED** Status Change Date: **April 4, 2025** SEVIS ID: [redacted]
	I-901 Fee Paid	I-20 ISSUE REASON: **CONTINUED ATTENDANCE**

TERMINATION REASON: **OTHERWISE FAILING TO MAINTAIN STATUS - Individual identified in criminal records check and/or has had their VISA revoked. SEVIS record has been terminated.**

Harlan L. Smith, M.Ed., M.A., LPC
Director

HARLANLS@mailbox.sc.edu | sc.edu/isss

Division of International Student and Scholar Support, Global Carolina

Interim Director, Office of International Services, Division of Human Resources

1705 College Street, Close-Hipp - Suite 470

Columbia SC 29208

UNIVERSITY OF South Carolina

International Student and Scholar Support | University of South Carolina

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

C. S. *and* D.T., *Plaintiffs*, v. KRISTI NOEM, *et al*, *Defendants*.	Civil Action No. 2:25-cv-477 Hon. William S. Stickman IV

ORDER OF COURT

AND NOW, this 15 day of April 2025, IT IS HEREBY ORDERED that the Motion for a Temporary Restraining Order (ECF No. 7) IS GRANTED IN PART AND DENIED IN PART for the reasons set forth on the record at the evidentiary hearing this day. A temporary restraining order is DENIED as to any governmental agency or officer altering information about Plaintiffs' status on the Student and Exchange Visitor Information System ("SEVIS"). A temporary restraining order is GRANTED in that Defendants are prohibited from upsetting the status quo as to instituting, commencing, or beginning deportation processes against the two named Plaintiffs during the pendency of the Motion for Preliminary Injunction (ECF No. 11). The bond requirement of Federal Rule of Civil Procedure 65 is waived.

IT IS FURTHER ORDERED that the Court will conduct a hearing on the Motion for Preliminary Injunction (ECF No. 11) on **Friday, April 25, 2025 at 8:00 AM**. Briefs in support of or opposition to Plaintiffs' Motion for Preliminary Injunction (ECF No. 11) shall be filed by **Wednesday, April 23, 2025 at 4:00 PM**.

BY THE COURT:

WILLIAM S. STICKMAN IV
UNITED STATES DISTRICT JUDGE

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
BUTTE DIVISION

JOHN ROE and JANE DOE, Plaintiffs, vs. KRISTI NOEM, in her official capacity as Secretary of Homeland Security; the DEPARTMENT OF HOMELAND SECURITY; and TODD LYONS, in his official capacity as Acting Director of U.S. Immigration and Customs Enforcement, Defendants.	CV 25–40–BU–DLC ORDER

Before the Court is Plaintiffs John Roe and Jane Doe's[1] ("Plaintiffs") Emergency Motion for Temporary Restraining Order and Preliminary Injunction. (Doc. 2.) For the reasons herein, the Court issues a temporary restraining order and sets a hearing on the Motion for April 29, 2025.

BACKGROUND

Plaintiffs are full-time international students currently enrolled at Montana State University, Bozeman ("MSU") (Doc. 1 ¶ 2.) Roe, a citizen of Iran, received

[1] Plaintiffs are proceeding under pseudonym to protect themselves against retaliation, doxing, and/or harassment. (Doc. 2 at 3.)

an F-1 visa to study in the United States on July 26, 2016, and Doe, a citizen of Turkey, first arrived in the United States on an F-1 visa in 2014. (Doc. 1 ¶¶ 20, 27.) Roe has been pursuing a Ph.D. in electrical engineering since 2019, and Doe a master's degree in microbiology since 2021. (*Id.* ¶ 3.) Neither student has been convicted of committing any crime or violating any immigration law in the United States, and neither student has been active in on-campus protests regarding any political issue. (*Id.*)

On April 10, 2025, Plaintiffs received an email from MSU informing them that their Student and Exchange Visitor Information System ("SEVIS") record was terminated. (Docs. 4 ¶ 17; 5 ¶ 16.) According to the email, Plaintiffs' SEVIS record indicated the following: "Individual identified in criminal records check and/or has had their VISA revoked. SEVIS record has been terminated." (Docs. 6-2 at 2; 6-3 at 2.) The email also provided that "[w]hen a student's record is terminated, that student is expected to depart the United States immediately. Unlawful presence in the United States could result in arrest, detention or deportation by federal authorities." (*Id.*)

On April 14, 2025, Plaintiffs filed this lawsuit against Kristi Noem, in her official capacity as Secretary of the Department of Homeland Security ("DHS"), DHS, and Todd Lyons, in his official capacity as Acting Director of U.S. Immigration and Customs Enforcement ("ICE") (collectively, Defendants),

alleging that DHS unlawfully terminated their F-1 student status in the SEVIS system. (Docs. 1 ¶ 15; 3 at 19.) Plaintiffs challenge DHS's termination of their F-1 student status in the SEVIS system. (Doc. 3 at 19.) Plaintiffs do not challenge the revocation of their F-1 visa. (*Id.*)

Count I alleges that Defendants violated the Due Process Clause of the Fifth Amendment to the United States Constitution by terminating Plaintiffs' SEVIS record based on improper grounds, without prior notice, and without providing Plaintiffs an opportunity to respond. (Doc. 1 ¶¶ 51–53.) Count II alleges that Defendants violated the Administrated Procedure Act ("APA") by terminating Plaintiffs' SEVIS record without statutory or regulatory authority. (*Id.* ¶¶ 54–57.) Count III alleges that Defendants violated the APA's procedural due process provision, 5 U.S.C. § 706(2)(B), by terminating Plaintiffs' SEVIS records based on improper grounds, without prior notice, and without providing Plaintiffs an opportunity to respond. (*Id.* ¶¶ 58–60.) And Count IV alleges that because Defendants failed to articulate the facts forming the basis for their decision to terminate Plaintiffs' SEVIS status, Defendants actions were "arbitrary, capricious, an abuse of discretion, or otherwise not accordance with the law." (*Id.* ¶¶ 61–63.)

Also on April 14, 2025, Plaintiffs filed an emergency motion for a temporary restraining order and preliminary injunction, seeking an order from this Court:

> (1) requiring Defendants to restore Plaintiffs' F-1 student status in SEVIS;
>
> (2) requiring Defendants Noem and Lyons to set aside the F-1 student status termination decisions as to Plaintiffs;
>
> (3) prohibiting Defendants Noem and Lyons from terminating Plaintiffs' F-1 student status absent a valid ground as set forth in 8 C.F.R. § 214.1(d), and absent an adequate individualized pre-deprivation proceeding before an impartial adjudicator for each Plaintiff, in which they will be entitled to review any adverse evidence and respond to such evidence prior to determining anew that any Plaintiff's F-1 student status should be terminated;
>
> (4) prohibiting all Defendants from arresting, detaining, or transferring Plaintiffs out of this Court's jurisdiction, or ordering the arrest, detention, or transfer of Plaintiffs out of this Court's jurisdiction, without first providing adequate notice to both this Court and Plaintiff's counsel as well as time to contest any such action; and
>
> (5) prohibiting all Defendants from initiating removal proceedings against or deporting any Plaintiff on the basis of the termination of their F-1 student status.

(Doc. 2 at 2–3.) Plaintiffs further request a waiver of the requirement for bond or security as provided for by Federal Rule of Civil Procedure 65(c). (*Id.* at 3.)

Counsel for Defendants have not yet appeared. On April 15, 2025, this Court issued an order requiring Plaintiffs to provide further information regarding efforts to notify Defendants of this matter. (Doc. 9.) Plaintiffs subsequently filed a Notice explaining that they are actively engaged in email correspondence with the United

States Attorney's Office for the District of Montana. (Docs. 10; 10-1.) As of the date of this Order, Defendants have not responded to Plaintiffs' Motion.

LEGAL STANDARD

Temporary restraining orders "serv[e] the [] underlying purpose of preserving the status quo and preventing irreparable harm just so long as is necessary to hold a hearing, and no longer." *Granny Goose Foods, Inc. v. Bhd. of Teamsters & Auto Truck Drivers Local No. 70 of Alameda Cty.*, 415 U.S. 423, 439 (1974). To obtain emergency injunctive relief—whether that be a temporary restraining order or preliminary injunction—a plaintiff must establish: (1) a likelihood of success on the merits; (2) a likelihood of irreparable harm in the absence of preliminary relief; (3) that the equities balance in the plaintiff's favor; and (4) that preliminary injunctive relief would serve the public interest. *See Winter v. Natural Res. Def Council, Inc.,* 555 U.S. 7, 20 (2008).

DISCUSSION

Although Defendants have yet to appear in this case, Plaintiffs have provided the Court with copies of email correspondence between the United States Attorney's Office for the District of Montana regarding this case. (*See* Docs. 10; 10-1.) The Court finds this email exchange sufficient to demonstrate notice for purposes of issuing a temporary restraining order, and thus will continue with a discussion of the merits. *See Document Operations, L.L.C. v. AOS Legal Techs.,*

Inc., 2021 WL 3729333, at *2 (5th Cir. 2021).

I. Likelihood of Success on the Merits

Plaintiffs argue they are likely to succeed on the merits of their Complaint for two reasons: first, the termination of Plaintiffs' F-1 status under the SEVIS system violates the APA and second, the termination violates the Due Process Clause of the United States Constitution. (Doc. 3 at 19.)

Plaintiffs direct this Court to a recent decision out of the United States District Court for the District of New Hampshire, a case presenting facts much like those at issue here. *See Liu v. Noem*, 25-cv-133-SE (D. NH April 10, 2025). There, a university student sued Noem and Lyons alleging that DHS unlawfully terminated his F-1 student status in the SEVIS system. *Id.* The plaintiff alleged DHS violated his due process rights under the Fifth Amendment to the United States Constitution and violated the APA when it terminated his status in the SEVIS system. *Id.* After oral argument, the court found the plaintiff was "likely to show that DHS's termination of his F-1 student status was not in compliance with 8 C.F.R. § 214.1(d) and was arbitrary, capricious, an abuse of discretion, or otherwise not in accordance with the law." *Id.* (citing 5 U.S.C. § 706(2)(A)).

The District of New Hampshire's conclusion is persuasive. 8 C.F.R. § 214.1(d) provides that "the nonimmigrant status of an alien shall be terminated by the revocation of a waiver authorized on his or her behalf under section 212(d)(3)

or (4) of the Act; by the introduction of a private bill to confer permanent resident status on such alien; or, pursuant to notification in the Federal Register, on the basis of national security, diplomatic, or public safety reasons." None of these mechanisms have been employed in this case. 8 C.F.R. § 214.1(d) does not provide statutory or regulatory authority to terminate F-1 student status in SEVIS based upon revocation of a visa. *See Fang v. Director U.S. Immigration & Customs Enforcement*, 935 F.3d 172, 185 n. 100 (3d Cir. 2019). Moreover, Plaintiffs' academic record and lack of criminal history fails to support an alternative basis for termination of their F-1 status; at any rate, DHS's decision does not purport to rely upon such a reason.

Therefore, the Court finds that Plaintiffs are likely to succeed on the allegation that Defendants' termination of Plaintiffs' F-1 student status under the SEVIS is arbitrary and capricious, an abuse of discretion, contrary to constitutional right, contrary to law, and in excess of statutory jurisdiction. 5 U.S.C. § 706(2). Because Plaintiffs are likely to succeed on their APA cause of action, the issue of due process need not be addressed at this time.

II. Likelihood of Irreparable Harm

Plaintiff Doe has been pursuing her master's degree in biology at MSU for the past three and a half years. (Doc. 5 ¶ 9.) As part of her program, she has been employed as a teaching and research assistant. (*Id.* ¶¶ 9–11.) Doe is scheduled to

complete her master's degree program and graduate with distinction on May 8, 2025. (*Id.* ¶ 12–15.) Plaintiff Roe has been pursuing his Ph.D. in electrical engineering/physics at MSU for the past six years. (Doc. 4 ¶ 7.) As part of his program, Roe has been employed by MSU as a research assistant and works approximately 60 to 65 hours per week. (*Id.* ¶ 8.) Losing F-1 status places Plaintiffs' education, research, financial stability, and career trajectories at imminent risk of irreparable harm. (Docs. 4 ¶ 22; 5 ¶ 21.) Plaintiffs also face the risk of immediate detention or removal from the United States.

In consideration of the above, Plaintiffs have successfully shown that, absent the relief provided for by a TRO, they will suffer irreparable harm for which an award of monetary damages would be insufficient.

III. Balance of Hardships and Public Interests

With respect to public interest, "when the government is a party, the analysis of the balance of the hardships and the public interest merge." *Nat'l Urban League v. Ross*, 484 F. Supp. 3d 802, 807 (N.D. Cal. 2020) (citing *Drakes Bay Oyster Co. v. Jewell*, 747 F.3d 1073, 1092 (9th Cir. 2014)). The relief requested restores Plaintiffs ability to remain in the United States to complete their degrees, and granting temporary relief in this instance will maintain the status quo. Although Defendants have yet to respond, the Court finds it compelling that Plaintiffs have not been convicted of any crime while in the United States. On balance, the

equities tip in Plaintiffs' favor at this stage of the proceedings. A TRO will preserve the status quo for the short duration until a hearing can be held in this matter.

Finally, it is unlikely any harm will come to Defendants as a result of this temporary restraining order. Therefore, the Court exercises its discretion to waive the bond requirement provided for by Rule 65(c). *See Johnson v. Couturier*, 572 F.3d 1067, 1086 (9th Cir. 2009).

CONCLUSION

Accordingly, IT IS ORDERED that Plaintiffs' Motion (Doc. 2) is GRANTED. Defendants Kristi Noam, the Department of Homeland Security, and Todd Lyons are temporarily enjoined for a period of fourteen days from the date of this Order as follows:

(1) Defendants shall restore Plaintiffs' F-1 student status in the Student and Exchange Visitor Information System;

(2) Defendants shall set aside the F-1 student status termination determination as to Plaintiffs;

(3) Defendants shall not terminate either Plaintiff's student status under the Student and Exchange Visitor Information System absent a valid ground as set forth in 8 C.F.R. § 214.1(d), and absent an adequate individualized pre-deprivation proceeding before an impartial adjudicator for each

Plaintiff;

(4) Defendants are prohibited from arresting, detaining, or transferring either Plaintiff out of this Court's jurisdiction, or ordering the arrest, detention or transfer of either Plaintiff out of this Court's jurisdiction, without first providing adequate notice to both this Court and Plaintiffs' counsel as well as appropriate time to contest any such action; and

(5) Defendants are prohibited from initiating removal proceedings against or deporting either Plaintiff on the basis of the termination of their F-1 student status.

IT IS FURTHER ORDERED that the security required by Federal Rule of Civil Procedure 65(c) is waived.

IT IS FURTHER ORDERED that Plaintiffs shall file, under seal, identifying information including full name, address, and date of birth, and any other information necessary for Defendants to reinstate their F-1 student status in the Student and Exchange Visitor Information System.

IT IS FURTHER ORDERED that Defendants shall file their response to Plaintiffs' Motion (Doc. 2) on or before April 21, 2025. Plaintiffs shall file their reply brief on or before April 25, 2025.

IT IS FURTHER ORDERED that a hearing on Plaintiffs' Motion (Doc. 2) shall be held on **April 29, 2025, at 9:00 a.m.** at the Russell Smith Federal

Courthouse in Missoula, Montana.

IT IS FURTHER ORDERED that the parties shall file respective notices by 5:00 p.m. on April 22, 2025, of any witnesses they intend to call at the hearing along with a brief summary of their expected testimony and the expected length of their testimony.

DATED this 15th day of April, 2025 at 4:45 p.m.

Dana L. Christensen, District Judge
United States District Court

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

Arizona Student DOE #2, Plaintiff, v. Donald J Trump, et al., Defendants.	No. CV-25-00175-TUC-AMM **ORDER**

Pending before the Court is Plaintiff's Emergency Ex Parte Motion for a Temporary Restraining Order (TRO). (Doc. 2).

Although "very few circumstances justify[] the issuance of an ex parte TRO," *Reno Air Racing Ass'n, Inc. v. McCord*, 452 F.3d 1126, 1131 (9th Cir. 2006), the Court has reviewed the pertinent briefs, record, and authority (*see* Docs. 1 through 6) and finds that Plaintiff has met all the requirements for a TRO. *See* Fed. R. Civ. P. 65(b) (Court may only issue a TRO without notice to the adverse party if (1) "specific facts in an affidavit or a verified complaint clearly show that immediate and irreparable injury, loss, or damage will result to the movant before the adverse party can be heard in opposition;" and (2) "the movant's attorney certifies in writing any efforts made to give notice and the reasons why it should not be required."); *Winter v. Nat. Res. Def. Council, Inc.*, 555 U.S. 7, 22 (2008) (Plaintiff seeking a TRO "must establish that he is likely to succeed on the merits, that he is likely to suffer irreparable harm in the absence of preliminary relief, that the balance of equities tips in his favor, and that an injunction is in the public interest."); *All. for the Wild*

Rockies v. Cottrell, 632 F.3d 1127, 1132 (9th Cir. 2011) (In the Ninth Circuit, "'serious questions going to the merits' and a hardship balance that tips sharply toward the plaintiff can support issuance of an injunction, assuming the other two elements of the *Winter* test are also met.").[1]

In light of the exigent circumstances, the Court issues this necessarily brief Order. Plaintiff's Emergency Ex Parte Motion for a Temporary Restraining Order is **granted** to preserve the status quo until the Court can receive further briefing and hold a hearing on **April 29, 2025 at 10:00 a.m.**[2] The Government shall file a response to Plaintiff's Emergency Motion for a Temporary Restraining Order by no later than **April 21, 2025**, and Plaintiff shall file a reply by no later than **April 24, 2025**.

IT IS FURTHER ORDERED as follows:

(a) Defendants are temporarily enjoined for fourteen days from arresting and detaining Plaintiff pending these proceedings, transferring Plaintiff away from the jurisdiction of this District pending these proceedings, or removing Plaintiff from the United States pending these proceedings;

(b) Defendants' actions in terminating Plaintiff's SEVIS record shall have no legal effect and shall not obstruct Plaintiff in continuing to pursue their academic and employment pursuits that Plaintiff is authorized to pursue as an international student in F-1 status.

(c) Plaintiff is not required to give security, *see* Fed. R. Civ. P. 65(c), as this Order

---

[1] Based on the limited information currently before the Court, the record reflects: (a) Plaintiff is a graduate student in lawful F-1 status; (b) Plaintiff is in full compliance with all requirements to lawfully remain in the United States pursuant to their F-1 status; (c) the Government has unlawfully terminated Plaintiff's Student and Exchange Visitor Information System ("SEVIS") record and revoked Plaintiff's F-1 visa in order to arrest, detain, or transfer Plaintiff far from Plaintiff's home, school, employer, and community without any hearing. Accordingly, in light of this record, Plaintiff has satisfied the requirements for a TRO at this very early stage of the litigation.

[2] The Court notes that United States District Judge Martinez is temporary unavailable. As such, United States District Judge Soto has temporarily stepped into this case to handle the pending emergency motion. However, this case remains with Judge Martinez, and Judge Martinez will be presiding over this case going forward (including the hearing set for April 29, 2025).

should not result in any financial damage to Defendants.

(d) Plaintiff shall serve Defendants with this Order forthwith.[3]

Dated this 15th day of April, 2025.

Honorable James A. Soto
United States District Judge

[3] This Order was filed at approximately 3:12 p.m. on April 15, 2025.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

CHANDRAPRAKASH HINGE, Plaintiff, v. TODD M. LYONS, Acting Director, United States Immigration and Customs Enforcement, Defendant.	Civil Action No. 25-1097 (RBW)

ORDER

In light of the plaintiff's Application for Temporary Restraining Order or in the Alternative Preliminary Injunction, ECF No. 2, and the parties' Joint Response to Court Order, ECF No. 13, it is hereby

ORDERED that the plaintiff's Application for Temporary Restraining Order or in the Alternative Preliminary Injunction, ECF No. 2, is **GRANTED IN PART AND DENIED WITHOUT PREJUDICE IN PART**. The motion is **GRANTED** to the extent outlined in this Order, in accordance with the proposed language that was jointly filed by the parties in their Joint Response to Court Order, ECF No. 13. The motion is **DENIED** in all other respects. It is therefore

ORDERED that the defendant shall return the plaintiff's record in the Student and Exchange Visitor Information System ("SEVIS") to the Active status. It is further

ORDERED that the defendant may not change or otherwise modify the plaintiff's record in SEVIS solely on the basis of his arrest on July 3, 2024, for a violation of Texas Transportation

Code 545.401(b) and subsequent dismissal of charge on April 9, 2025, by the Dallas County Criminal Court.

SO ORDERED this 17th day of April, 2025.

REGGIE B. WALTON
United States District Judge

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Rattanand Ratsantiboon,

Plaintiff,

v.

Kristi Noem, *Secretary of Department of Homeland Security, in her official capacity*; Todd Lyons, *Acting Director Immigration & Customs Enforcement, in his official capacity*; and U.S. Immigration & Customs Enforcement,

Defendants.

File No. 25-CV-01315 (JMB/JFD)

ORDER

This matter is before the Court on Plaintiff Rattanand Ratsantiboon's motion for a temporary restraining order (TRO) against Defendants Kristi Noem, Todd Lyons, and U.S. Immigration & Customs Enforcement (ICE) (together, Defendants). (Doc. No. 12.) Ratsantiboon asks the Court to enter a TRO ordering the following: (1) enjoining Defendants from terminating Ratsantiboon's F-1 student status in the Student and Exchange Visitor (SEVIS) system; and (2) requiring Defendants to set aside their termination decision as to Ratsantiboon. For the reasons stated below, the Court grants Ratsantiboon's motion.

BACKGROUND

Ratsantiboon is a citizen of Thailand who has resided in the United States since September 1, 2014, when he was lawfully admitted into the United States under an F-1 visa. (Doc. No. 13 ¶ 2; Doc. No. 12 at 2.) Ratsantiboon is currently enrolled as a full-time

nursing student at Metropolitan State University. (Doc. No. 13 ¶ 1.) Ratsantiboon has two prior criminal convictions: a careless driving offense on May 8, 2018, and a third-degree Driving While Impaired offense on August 2, 2018. (*Id.* ¶¶ 6–7.) He has never been subjected to any academic disciplinary action related to these offenses. (*Id.* ¶ 8.)

On March 28, 2025, ICE marked Ratsantiboon's student status as "terminated" within the SEVIS system. (*Id.* ¶ 8.) ICE entered the reason for termination as "Otherwise Failing to Maintain Status – Student identified in criminal records check. Terminated pursuant to INA 237(a)(1)(C)(i) / 8 USC 1227(a)(1)(C)(i)." (*Id.* ¶ 5.) ICE did not inform Ratsantiboon that his status had been terminated; he learned of his altered status only through a school official. (*Id.* ¶ 9.) On April 8, 2025, Metropolitan State University attempted to issue a new I-20 document for Ratsantiboon. However, ICE blocked the effort, this time providing the reason for termination as "OTHER- Individual identified in criminal records check and/or has had their VISA revoked. SEVIS record has been terminated." (*Id.* ¶ 10.) This entry was backdated to March 28, 2025. (*Id.*)

On April 8, 2025, Ratsantiboon filed this action. (Doc. No. 1.) In his four-count Complaint, Ratsantiboon seeks declaratory and injunctive relief on grounds that Defendants violated the Administrative Procedure Act (APA) when they terminated his SEVIS record on improper grounds, without prior notice, without an articulated basis for their decision, and without providing Ratsantiboon an opportunity to respond. Ratsantiboon contends that Defendants acted in an arbitrary and capricious manner, inconsistent with the intent and plain language of the Immigration & Nationality Act and in violation of the Due Process Clause of the Fifth Amendment.

DISCUSSION

Ratsantiboon now moves for a TRO to temporarily enjoin Defendants from terminating his student status in the SEVIS system and to require Defendants to set aside their termination decision. Based on the record presented to the Court at this stage, the Court concludes that the applicable factors favor immediate temporary relief.

When considering a motion for a TRO, courts consider the following four factors: "(1) the threat of irreparable harm to the movant; (2) the state of balance between this harm and the injury that granting the injunction will inflict on other parties litigant; (3) the probability that movant will succeed on the merits; and (4) the public interest." *Dataphase Sys., Inc. v. C L Sys., Inc.*, 640 F.2d 109, 114 (8th Cir. 1981); *see also Tumey v. Mycroft AI, Inc.*, 27 F.4th 657, 665 (8th Cir. 2022) ("[T]he standard for analyzing a motion for a temporary restraining order is the same as a motion for preliminary injunction."). No one factor is determinative, and courts "flexibly weigh the case's particular circumstances to determine whether the balance of equities so favors the movant that justice requires the court to intervene." *Hubbard Feeds, Inc. v. Animal Feed Supplement, Inc.*, 182 F.3d 598, 601 (8th Cir. 1999) (quotation omitted). The moving party bears the burden to establish these factors. *E.g.*, *Watkins Inc. v. Lewis*, 346 F.3d 841, 844 (8th Cir. 2003).

Based on the record presented to the Court at this time, the Court concludes that the first factor favors granting the requested TRO: Ratsantiboon faces irreparable harm in the absence of temporary relief. Ratsantiboon is currently engaged in the middle of his spring semester, for which he has already paid tuition in full. (Doc. No. 13 ¶¶ 1, 13.) The termination of Ratsantiboon's F-1 student status in the SEVIS system renders him

immediately ineligible to attend classes and sit for his final examinations. Ratsantiboon thus faces the imminent prospect of losing credit for the coursework he has thus far performed. (Doc. No. 8 at 3.) In addition, the termination of Ratsantiboon's SEVIS record forces him to live in uncertain legal status while he pursues this matter (Doc. No. 13 ¶ 14), which can constitute a separate irreparable harm. *See Melendres v. Arpaio*, 695 F.3d 990, 1002 (9th Cir. 2012) (concluding that plaintiffs' reasonable fear of being subject to unlawful detention absent a preliminary injunction may constitute irreparable harm).

This harm plainly outweighs the risk of injury to Defendants. Ratsantiboon stands to lose his lawful status in his present country of residence, a semester's worth of course credits, and future career prospects. By contrast, the temporary nature of the requested relief poses minimal harm to Defendants. *See Nebraska v. Biden*, 52 F.4th 1044, 1047 (8th Cir. 2022) (concluding that "the equities strongly favor an injunction considering the irreversible impact [the challenged agency] action would have as compared to the lack of harm an injunction would presently impose").

The third *Dataphase* factor, probability of success on the merits, also favors granting the requested relief at this time. Ratsantiboon alleges that Defendants violated the APA when they marked his student status as terminated in violation of their own regulations. *See* 8 C.F.R. § 214.1(d) (stating that nonimmigrant status may be terminated under the following three circumstances: (1) the revocation of a waiver authorized on the individual's behalf; (2) the introduction of a private bill to confer permanent resident status; or (3) pursuant to notification in the Federal Register on the basis of national security, diplomatic, or public safety reasons). None of those three circumstances appear to be

present in this case, as the record before the Court indicates that no waiver has been revoked, no private bill has been introduced, and no notification in the Federal Register has been published. An agency's unexplained refusal to follow its own regulations effecting individuals' procedural benefits poses a high probability that the agency is not acting in accordance with the APA. *United States ex rel. Accardi v. Shaughnessy*, 347 U.S. 260, 265 (1954); *see also Webster v. Doe*, 486 U.S. 592, 602 n.7 (1988) (noting that "the Agency's failure to follow its *own regulations* can be challenged under the APA" (emphasis in original)); *Fed. Defs. of N.Y., Inc. v. Fed. Bureau of Prisons*, 954 F.3d 118, 130 (2d Cir. 2020) ("Under deeply rooted principles of administrative law, not to mention common sense, government agencies are generally required to follow their own regulations."); *Leslie v. Att'y Gen. of U.S.*, 611 F.3d 171, 175 (3d Cir. 2010) (observing the "the long-settled principle that rules promulgated by a federal agency that regulate the rights and interests of others are controlling upon the agency" (citing *Columbia Broad. Sys., Inc. v. United States*, 316 U.S. 407, 422 (1942))).

Lastly, the Court concludes that there is substantial public interest in ensuring that governmental agencies abide by federal laws, *Texas v. United States*, 40 F.4th 205, 229 (5th Cir. 2022), and there is no identifiable public interest in permitting federal officials to act outside of the law. *Missouri v. Trump*, 128 F.4th 979, 997 (8th Cir. 2025).

Therefore, the balance of the *Dataphase* factors favors granting the requested interim relief at this time. Further, the Court exercises its discretion to waive the bond requirement set forth in Rule 65(c) of the Federal Rules of Civil Procedure at this time.

See Richland/Wilkin Joint Powers Auth. v. U.S. Army Corps of Eng'rs, 826 F.3d 1030, 1043 (8th Cir. 2016).

A motion hearing will be held on April 28, 2025, at 11:00 a.m., to address whether to extend the interim relief ordered, and if so, for how long. This Order shall remain in effect at least until the hearing on April 28, 2025, and absent objection by the moving party, the Court may consider construing Ratsantiboon's motion as a request for a preliminary injunction to remain in place during the pendency of this case. Defendants are ordered to respond to Ratsantiboon's motion for injunctive relief (Doc. No. 12) on or before April 22, 2025. Ratsantiboon may reply on or before April 25, 2025.

ORDER

Based on the foregoing, and on all of the files, records, and proceedings herein, IT IS HEREBY ORDERED THAT:

1. Plaintiff Rattanand Ratsantiboon's motion for an emergency temporary restraining order (Doc. No. 12) is GRANTED.

2. Defendants are required to temporarily set aside their determination to mark Ratsantiboon's F-1 student status as terminated. Defendants shall reinstate Ratsantiboon's student status and SEVIS authorization, retroactive to March 28, 2025.

3. Defendants are also temporarily enjoined from taking any further action to terminate Ratsantiboon's student status or revoke his visa.

4. This Order takes effect immediately and shall continue until its expiration in fourteen days.

Dated: April 15, 2025

/s/ *Jeffrey M. Bryan*
Judge Jeffrey M. Bryan
United States District Court

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

XINYUAN WU, *et al.*,

Plaintiffs,

– against –

TODD M. LYONS,

Defendant.

TEMPORARY RESTRAINING ORDER
25-cv-01979 (NCM)

NATASHA C. MERLE, United States District Judge:

WHEREAS, upon review of plaintiffs' motion for a temporary restraining order, the accompanying declarations and the exhibits attached thereto, the memorandum of law submitted in support, as well as the parties' arguments raised during the April 11, 2025, hearing on plaintiffs' motion, and for good cause shown; and

WHEREAS, for the reasons set forth on the record, the Court finds that plaintiffs have shown by a preponderance of the evidence a likelihood of success on the merits of their claim pursuant to the Administrative Procedure Act, 5 U.S.C. §§ 551, *et seq.*, that plaintiffs will likely suffer irreparable harm which cannot be remedied by money damages, and that the balance of hardships and public interest weigh in favor of temporary injunctive relief; it is hereby

ORDERED that, pending further order of this Court, defendant is enjoined from terminating plaintiff Wu's Student and Exchange Visitor Information System ("SEVIS") record and F-1 visa status; and it is further

ORDERED that, pending further order of this Court, defendant must set aside its decision to terminate plaintiffs' visa statuses and plaintiff Wu's SEVIS record; and it is further

ORDERED that this temporary restraining order shall be in effect for a period of fourteen (14) days from the entry hereof, after which it shall expire absent further order of the Court; and it is further

ORDERED that the bond requirement of Rule 65(c) is waived; and it is finally

ORDERED that by April 16, 2025, the parties shall meet and confer and submit an appropriate briefing schedule for plaintiffs' motion for a preliminary injunction, which must conclude no later than April 22, 2025, so that the Court may hold a hearing by April 24, 2025, if necessary.

/s/ Natasha C. Merle
NATASHA C. MERLE
United States District Judge

Issued: April 11, 2025
Brooklyn, New York

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

HUADAN ZHENG, a/k/a CARRIE ZHENG,	)	
Plaintiff,	)	
v.	)	**Civil Action No. 25-cv-10893-FDS**
TODD LYONS, Acting Director, U.S. Immigration and Customs Enforcement,	)	
Defendant.	)	

TEMPORARY RESTRAINING ORDER

SAYLOR, C.J.

After reviewing the complaint, the application for a temporary restraining order, and related filings, for good cause shown, and pursuant to Fed. R. Civ. P. 65, the Court hereby orders as follows:

1. Defendant Todd Lyons, Acting Director, United States Immigration and Customs Enforcement, and any agents acting under his authority or control, are temporarily restrained (a) from arresting or detaining plaintiff Huadan Zheng, a/k/a Carrie Zheng, under 8 U.S.C. § 1226(a), or otherwise for being unlawfully present in the United States without legal permission or authority, based on the termination or revocation of her F-1 student visa, or (b) if plaintiff has already been arrested or detained, transferring her outside the District of Massachusetts, until 5:00 p.m. on Wednesday, April 16, 2025. This order is subject to such further extension by the Court as may be appropriate

2. This order is issued without notice to the United States because there are specific facts set out in the affidavits and pleadings that clearly show that immediate and irreparable injury, loss, or damage will result to the movant before the United States can be heard in opposition and the

movant's attorney has certified in writing any efforts made to give notice to the United States and the reasons why it should not be required.

3. Plaintiff is ordered to serve a copy of this Temporary Restraining Order, the Complaint, the Summons, and the Motion and Application for Temporary Restraining Order and related filings on the United States Attorney for the District of Massachusetts by 11:59 p.m. on Friday, April 11, 2025, and to complete service in accordance with Fed. R. Civ. P. 4(i)(2) by 5:00 p.m. on Monday, April 14, 2025.

4. Defendant shall file any opposition or response to the application for a temporary restraining order by the close of business on Wednesday, April 16, 2025.

5. A hearing shall be held on Thursday, April 17, 2025, at 3:30 p.m., in Courtroom 10.

So Ordered.

/s/ F. Dennis Saylor IV
F. Dennis Saylor IV
Chief Judge, United States District Court

Dated at Boston, Massachusetts, April 11, 2025, 3:15 p.m.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

Xiaotian Liu

v. Case No. 25-cv-133-SE

Kristi Noem et al.

O R D E R

On April 7, 2025, Plaintiff Xiaotian Liu brought suit against Kristi Noem, the Secretary of the Department of Homeland Security, and Todd Lyons, the Acting Director of Immigration and Customs Enforcement, alleging that DHS unlawfully terminated his F-1 student status in the Student and Exchange Visitor ("SEVIS")[1] system. He alleges, among other things, that DHS violated his due process rights under the Fifth Amendment and violated the Administrative Procedure Act when it terminated his status in the system. Liu filed a motion for a temporary restraining order with his complaint, requesting a TRO "(i) enjoining Defendants from terminating Plaintiff's F-1 student status under the Student and Exchange Visitor (SEVIS) system and (ii) requiring Defendants to set aside their termination determination." Doc. no. 2 at 1.

The court held a brief video hearing on April 7. Although Liu filed a motion for a TRO, his attorneys communicated with the defendants' attorney, who was able to attend the hearing. The parties agreed that the court should not consider the motion for a TRO at that hearing and that they would confer regarding a potential briefing schedule and provide the court with a status update on or before April 9.

[1] SEVIS is "the web-based system that [DHS] uses to maintain information regarding: . . . F-1 . . . students studying in the United States[.]" About SEVIS, Department of Homeland Security, https://studyinthestates.dhs.gov/site/about-sevis (last visited April 10, 2025).

On the evening of April 8 and the early morning of April 9, Liu filed two addenda to his motion for a TRO. See doc. nos. 7 and 8. In the latter addendum, Liu stated that because of the "potential immigration detention and deportation in light of the F-1 student status termination, on April 7, 2025, Plaintiff's counsel attempted to receive assurance from Defendants' counsel that Defendants would not arrest, detain, or place him in removal proceedings during the pendency of [litigation regarding the] temporary restraining order and preliminary injunction." Doc no. 8 at 3. Liu added that his "counsel could not receive such assurances from Defendants' counsel." Id. He therefore notified the defendants' counsel that he would pursue his motion for a TRO immediately and he requested an emergency hearing. The court held that hearing on April 9, and counsel for both Liu and the defendants appeared.

As explained at the hearing, although the defendants were given notice and an opportunity to be heard, the court does not convert the motion for a TRO into a motion for a preliminary injunction. The defendants' counsel acknowledged at the hearing that he had not had adequate time to investigate certain of Liu's factual allegations or evaluate properly the legal bases on which Liu's motion rests. Therefore, the court construes Liu's motion as a request for the provisional remedy of a TRO with notice, which essentially seeks to avoid irreparable harm until the defendants are able to review the factual record and develop their legal arguments sufficiently to address the request for preliminary relief.

In evaluating a motion for a TRO, the court considers the same four factors that apply to a motion for a preliminary injunction. Karlsen v. Town of Hebron, Civ. No. 18-cv-794-LM, 2018 WL 11273651, at *1 (D.N.H. Sept. 28, 2018). Those four factors include "(i) the likelihood that the movant will succeed on the merits; (ii) the possibility that, without an injunction, the movant will suffer irreparable harm; (iii) the balance of relevant hardships as between the parties; and

(iv) the effect of the court's ruling on the public interest." Coquico, Inc. v. Rodríguez-Miranda, 562 F.3d 62, 66 (1st Cir. 2009). "The first of these four factors normally weighs heaviest in the decisional scales." Id. When, as here, the defendants are government officials sued in their official capacities, the balance of the hardships and the public interest factors merge. Does 1-6 v. Mills, 16 F.4th 20, 37 (1st Cir. 2021).

After considering Liu's motion for a TRO, the exhibits attached thereto, and the addenda, as well as the parties' oral argument during the April 9 hearing, the court granted Liu's motion for a TRO on the record at the hearing.

Liu has shown a likelihood of success on the merits of his claim in Count 2, that DHS violated the APA when it terminated his F-1 student status in the SEVIS system. Based on the record before the court, Liu is likely to show that DHS's termination of his F-1 student status was not in compliance with 8 C.F.R. § 214.1(d) and was arbitrary, capricious, an abuse of discretion, or otherwise not in accordance with the law. See 5 U.S.C. § 706(2)(A). The defendants did not offer any legal or factual argument contradicting Liu's likelihood of success on the merits of Count 2 during the hearing.[2]

Because DHS terminated Liu's F-1 student status in the SEVIS system, he is no longer authorized to work as a research assistant or participate in any research, and he is no longer eligible to receive any stipend from his Ph.D. program at Dartmouth College. There is uncontroverted evidence that due to his inability to participate in research, Dartmouth must require him to disenroll from his current courses so that Dartmouth can remain in compliance

[2] Because the court finds that Liu has shown a likelihood of success on the merits of his APA claim in Count 2, it does not address at this time his claim in Count 1 that DHS violated his due process rights under the Fifth Amendment when it terminated his F-1 status in the SEVIS system.

with federal law. Additionally, it may be too late to forestall this requirement by the time the defendants are prepared to be heard on the preliminary injunction. These circumstances will derail Liu's academic trajectory and ability to complete his Ph.D. program in a timely fashion. This loss of timely academic progress alone is sufficient to establish irreparable harm. Further, the change in Liu's status in the SEVIS system may expose him to a risk of detention or deportation. The defendants' inability to agree that he would not be detained or deported as a result of his status change before the defendants could be prepared to be heard on Liu's request for preliminary relief is an acknowledgement of the existence of this risk. The evidence before the court further establishes that the uncertain link between Liu's SEVIS status and the possibility of detention and deportation is causing him emotional harm. Liu has shown that, without a TRO, he will suffer irreparable harm for which an award of monetary damages would not be sufficient.

The balance of the hardships and whether injunctive relief is in the public interest both weigh in Liu's favor. The only argument that the defendants offered on these factors was a concern that a TRO in this case may interfere with ICE's ability to carry out its duties. Though the defendants did not challenge for the purposes of the April 9 hearing the allegation that Liu's SEVIS status had changed, they could not confirm that his status had changed, or if it had, whether it had been changed intentionally or as the result of an error. Nor could the defendants confirm that ICE had included Liu in any priority. At best, the defendants ask the court to avoid unintentionally interfering with ICE's ability to carry out some unstated duty. For his part, Liu points to the irreparable injury that he contends supports his request for immediate relief, as well as Congress's expressed intent to allow foreign students to pursue educational opportunities in

the United States without interference. The court finds that these two factors weigh in Liu's favor.

A TRO is necessary to avoid irreparable harm in this case. It is made more appropriate given its anticipated short duration, which is only long enough to afford the defendants the time they have requested to prepare their factual and legal responses to Liu's requests for preliminary relief.

After considering the relevant factors, the court exercises its discretion to waive the bond requirement embedded in Rule 65(c) of the Federal Rules of Civil Procedure. See Crowley v. Local No. 82, Furniture & Piano Moving, Furniture Store Drivers, Helpers, Warehousemen, & Packers, 679 F.2d 978, 1001 (1st Cir. 1982), rev'd on other grounds, 467 U.S. 526 (1984).

Conclusion

For the foregoing reasons, the plaintiff's motion for a temporary restraining order (doc. no. 2) is granted. The parties shall meet and confer regarding an appropriate briefing and argument schedule for the preliminary injunction hearing, with the hearing scheduled no later than April 23, 2025.

All defendants are (i) enjoined from terminating Mr. Liu's F-1 student status under the SEVIS [Student and Exchange Visitor] system, and (ii) required to set aside their termination determination. This order shall remain in effect until further order of the court.

SO ORDERED.

Samantha D. Elliott
United States District Judge

April 10, 2025
cc: Counsel of Record.

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

MATTHEW ARIWOOLA, *Plaintiff,* v. KRISTI NOEM, in her official capacity as Secretary of Homeland Security; the DEPARTMENT OF HOMELAND SECURITY; and TODD LYONS, in his official capacity as Acting Director of U.S. Immigration and Customs Enforcement, *Defendants.*	Case No. **Declaration of Meredith McPhail**

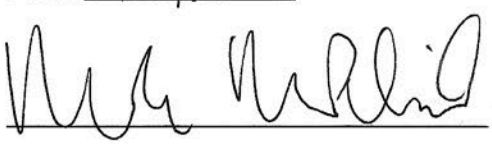
I, Meredith McPhail, certify under penalty of perjury that the following statements are true and correct pursuant to 28 U.S.C. § 1746.

1. My name is Meredith McPhail, and I am older than eighteen years of age. The statements in this declaration are based upon my own personal knowledge.

2. "Exhibit 2" is an email exchange between employees at the University of South Carolina and a recently-terminated F-1 nonimmigrant student from the University of South Carolina.

3. I obtained consent from the redacted recipient to share Exhibit 2 subject to the redactions included therein.

Date: 4/18/25



Meredith McPhail