

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IMRAN AHMED,

Plaintiff,

v.

MARCO RUBIO, in his official capacity as Secretary of State, SARAH B. ROGERS, in her official capacity as Under Secretary of State for Public Diplomacy, PAMELA BONDI, in her official capacity as Attorney General, KRISTI NOEM, in her official capacity as Secretary of Homeland Security, TODD M. LYONS, in his official capacity as Acting Director of U.S. Immigration and Customs Enforcement, and JUDITH ALMODOVAR, in her official capacity as Acting Field Office Director of the New York Immigration and Customs Enforcement Office,

Defendants.

Case No. 25 Civ. 10705 (LAP)

STIPULATION AND [PROPOSED] ORDER

WHEREAS, on December 24, 2025, Plaintiff filed a Complaint, ECF 1, and Order to Show Cause for Temporary Restraining Order and Preliminary Injunction, ECF 8;

WHEREAS, on December 25, 2025, the Court entered a Temporary Restraining Order (“TRO”) which, among other things, enjoined Defendants from arresting or detaining Plaintiff pending further order of the Court, ECF 14;

WHEREAS, on January 5, 2026, counsel for the parties to the above-captioned action appeared before the Court for an Interim Pretrial Conference;

WHEREAS, during that conference, counsel for Defendants consented to an extension of the TRO such that the TRO shall remain in full force and effect during the pendency of Plaintiff's Order to Show Cause; and

WHEREAS, the Court asked the parties to memorialize these agreements (including with respect to the briefing schedule).

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between the parties that:

1. The TRO entered on December 25, 2025 is extended by consent and shall remain in full force and effect during the pendency of Plaintiff's Order to Show Cause in this Court.
2. Defendants shall file any opposition to the Order to Show Cause and any motion to dismiss by January 30, 2026.
3. Plaintiff shall file his reply in further support of the Order to Show Cause and his opposition to Defendants' motion to dismiss by February 27, 2026. In that reply, Plaintiff will not be limited to responding only to the arguments made by the Defendants in their opposition to Plaintiff's Order to Show Cause.
4. Defendants shall file their reply in further support of their motion to dismiss by March 11, 2026.

5. The subparagraph in the Prayer for Relief in Plaintiff's Complaint which requests that the Court "[e]njoin Defendants from taking any enforcement action against Mr. Ahmed arising directly or indirectly from an investigation into the applicability of the Foreign Policy Ground," ECF 1 at 29, is hereby struck from the Complaint, without the need for Plaintiff to file an Amended Complaint.
6. A facsimile or scanned copy of this stipulation will be considered the same as an original and may be filed with the court electronically.

Dated: January 9, 2026
New York, New York

/s/ Roberta A. Kaplan
Roberta A. Kaplan
D. Brandon Trice
Maximilian T. Crema
Michael P. Quinn
Avita Anand
KAPLAN MARTIN LLP
1133 Avenue of the Americas | Suite 1500
New York, NY 10036
Tel.: (212) 316-9500
rkaplan@kaplanmartin.com
btrice@kaplanmartin.com
mcrema@kaplanmartin.com
mquinn@kaplanmartin.com
aanand@kaplanmartin.com

JAY CLAYTON
United States Attorney for the
Southern District of New York

By: /s/ Brandon M. Waterman
BRANDON M. WATERMAN
Assistant United States Attorney
86 Chambers Street, Third Floor
New York, New York 10007
Telephone: (212) 637-2743
brandon.waterman@usdoj.gov

Attorney for Defendants

/s/ Christopher J. Clark

Christopher J. Clark
Andrew J. Rodgers
CLARK SMITH VILLAZOR LLP
666 Third Avenue, 21st Floor
New York, NY 10019
Tel: (212) 377-0850
clark@csvgllp.com
andrew.rodgers@csvgllp.com

/s/ Norman Eisen

NORMAN EISEN**
STEPHEN JONAS**
DEMOCRACY DEFENDERS FUND
600 Pennsylvania Avenue SE #15180
Washington, D.C. 20003
202-594-9958
norman@democracydefenders.org

** *pro hac vice*

Attorneys for Plaintiff Imran Ahmed

IT IS SO ORDERED.

Hon. Loretta A. Preska
United States District Judge

Dated: January __, 2026