

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

BADAR KHAN SURI

Petitioner,

v.

DONALD TRUMP, *et al.*,

Respondents.

Case No. 1:25-cv-480

PETITIONER’S MOTION FOR PRELIMINARY INJUNCTION

Petitioner Badar Khan Suri respectfully moves this Court for a preliminary injunction. Fed. R. Civ. P. 65(a). As set out in detail in the accompanying Memorandum, Respondents’ actions in terminating Petitioner’s SEVIS record violate the Administrative Procedure Act and the First and Fifth Amendments to the United States Constitution. Because Petitioner can show a likelihood of success on the merits, is suffering and will continue to suffer irreparable harm absent preliminary relief, and the balance of harms and interests weighs strongly in Petitioner’s favor, Petitioner moves for a preliminary injunction (1) requiring Respondents to immediately set aside their termination of his and his children’s SEVIS records; (2) requiring Respondents to reinstate, retroactive to March 18, 2025, his J-1 exchange visitor status and his corresponding SEVIS record and his children’s J-2 status and corresponding SEVIS records; (3) enjoining Respondents or their officers, agents, servants, employees, or attorneys from terminating those records for the duration of this litigation, unless Respondents become aware of a newly discovered, independent legal ground to terminate those records; (4) requiring Respondents to provide at least 21 days advance notice to Petitioner and his counsel of any intent to terminate Petitioner’s or his children’s SEVIS

records based on newly discovered, independent legal grounds; (5) enjoining Respondents or their officers, agents, servants, employees, or attorneys from directly or indirectly enforcing, implementing, or otherwise imposing any consequence, including adverse immigration action, arising out of the termination of Petitioner's or his children's SEVIS records or J-1 or J-2 status; and (6) ordering any other relief as may be necessary. Petitioner further requests that the Court set an expedited schedule for the briefing of this Motion.

Dated: June 23, 2025

Respectfully submitted,

/s/Eden B. Heilman

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**Admitted pro hac vice*

*** Pro hac vice application forthcoming*

Counsel for Petitioner

CERTIFICATE OF SERVICE

I, Eden Heilman, hereby certify that on this date, I uploaded a copy of Petitioner's Motion for Preliminary Injunction and any attachments using the CM/ECF system, which will cause notice to be served electronically to all parties.

Date: June 23, 2025

Respectfully submitted,

/s/ Eden B. Heilman

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