

**IN THE 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 EXPEDITED BRIEFING ON HIS MOTION FOR
LEAVE TO FILE SECOND AMENDED PETITION FOR WRIT OF HABEAS CORPUS
AND COMPLAINT AND MOTION FOR PRELIMINARY INJUNCTION**

Petitioner Badar Khan Suri respectfully requests that the Court enter an expedited briefing schedule for his Motion for Leave to File Second Amended Petition for Writ of Habeas Corpus and Complaint, ECF 78, and Motion for Preliminary Injunction, ECF 79, seeking to enjoin Respondents from terminating Dr. Khan Suri's SEVIS record and J-1 exchange visitor status so that he may return to his post-doctoral program at Georgetown University. Specifically, Petitioner requests that any response by Respondents to the motion for leave to amend the petition and complaint be due on June 27, 2025, with Petitioner's reply, if necessary, due three days later, on June 30, 2025. Petitioner further requests that Respondents' opposition to the motion for preliminary injunction be due on July 7, 2025, with Petitioner's reply due seven days later, on July 14, 2025. If the Court believes that a hearing would aid its resolution of the motion for preliminary injunction, Petitioner respectfully requests that the Court schedule the hearing for the earliest available date after briefing is complete. Counsel for Petitioner has conferred with counsel for Respondents who consent to the proposed briefing schedule but indicate they are unavailable for a hearing on July 17-18.

Petitioner seeks this schedule due to the need for a ruling sufficiently in advance of the 2025-26 academic year at Georgetown University so that he may have his SEVIS record and J-1 status reinstated, return to his post-doctoral program, teach his class on majoritarianism and minority rights in South Asia this fall, and resume his research on religious intolerance and pluralism. An order granting the preliminary injunction at least several weeks before Georgetown's academic year begins on August 27, 2025, would enable Dr. Khan Suri to take the steps necessary to have his Georgetown credentials reinstated and begin preparations for the fall academic semester. The schedule Petitioner proposes would allow full briefing on the issues involved and gives the Court time to consider them and issue a ruling prior to this date.

Because Dr. Khan Suri's career and financial livelihood depend on his ability to return to his post-doctoral program at Georgetown, Petitioner respectfully requests the Court enter the following schedule on his Motion for Leave to File Second Amended Petition for Writ of Habeas Corpus and Complaint, ECF 78, and Motion for Preliminary Injunction, ECF 79, or otherwise shorten the briefing scheduled contemplated by Local Rule 7(F)(1):

- Respondents' Opposition, if filed, to Motion for Leave: **Due Fri, June 27, 2025.**
- Petitioner's Reply, if necessary, to Motion for Leave: **Due Mon, June 30, 2025.**
- Respondents' Opposition to Motion for Preliminary Injunction: **Due Mon, July 7, 2025.**
- Petitioner's Reply to Motion for Preliminary Injunction: **Due Mon, July 14, 2025.**

Dated: June 23, 2025

Respectfully submitted,

/s/Eden B. Heilman

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** 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 Expedited Briefing 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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