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March 26, 2025

BY ECF

The Honorable Arun Subramanian
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Khalil, et al. v. Trustees of Columbia University*,
25 Civ. 02079 (AS)

Dear Judge Subramanian:

This letter is respectfully submitted on behalf of Plaintiff Mahmoud Khalil and the seven pseudonymous Plaintiffs, whom I represent along with Gadeir Abbas, Esq. and Nadia Bayado, Esq., from Counsel on American Islamic Relations (“CAIR”) National, Lamya Agarwala, Esq., from CAIR of New York, and Jonathan Wallace, Esq.

Per the Court’s instructions during yesterday’s hearing on the Motion for a Temporary Restraining Order and Preliminary Injunction, we write to inform the Court that we welcome the opportunity to submit a second amended complaint that addresses the issues raised by this Court. We respectfully request the Court’s leave, pursuant to Fed. R. Civ. P. Rule 15(a)(2), to do so. The Defendants’ position is set forth below.

With this Court’s permission, we propose to file the amended complaint by noon on Tuesday, April 1st as we will require time to meet the Court’s March 27th 5 p.m. deadline for additional briefing, confer with each of the eight Plaintiffs, and make the necessary additions to the complaint, or whatever date and time as determined by the Court.

As instructed, counsel for the Plaintiffs sought the position of the attorneys representing each Defendant on Plaintiffs filing of an amended complaint. Their written responses are directly quoted below:

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- “The Columbia defendants take no position based on plaintiffs’ representation that they plan to further amend their complaint to add allegations addressing the issues raised by the Court at yesterday’s hearing.”
- “The Executive Branch Defendants and the Congressional Defendants would consent to Plaintiffs amending their complaint for a second and final time, should they agree to drop their current Motion for a Temporary Restraining Order and Preliminary Injunction, which is premised on a complaint that will soon no longer be operative. Otherwise, the Executive Branch Defendants and Congressional Defendants do not consent.”

Notwithstanding the Executive Branch Defendants’ and the Congressional Defendants’ position, in light of the fact that the Court maintained the Temporary Restraining Order pending the supplemental briefing owed to the Court tomorrow and contemplating Plaintiffs’ filing of an amended complaint, it is Plaintiffs’ position that the Temporary Restraining Order should remain in place unless and until the Court decides otherwise based on the filings tomorrow afternoon and the filing of the second amended complaint on Tuesday, or at whatever time the Court determines.

Accordingly, it is respectfully requested that the Court’s grant Plaintiffs’ request, pursuant to Fed. R. Civ. P. Rule 15(a)(2), to amend their complaint a second time.

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'Amy Greer', with a long horizontal line extending to the right.

Amy Greer
Gaddeir Abbas
Nadia Bayado
Lamya Agarwala
Jonathan Wallace

Attorneys for Plaintiffs

AEG/