



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*86 Chambers Street
New York, New York 10007*

April 8, 2025

BY ECF

The Honorable Mary Kay Vyskocil
United States District Judge
500 Pearl Street, Room 2230
New York, New York 10007

Re: *AAUP, et al. v. DOJ, et al.*, 25 Civ. 2429 (MKV)

Dear Judge Vyskocil:

This Office represents Defendants in the above-captioned matter. We write respectfully to request both an extension of time to respond to Plaintiffs' motion and additional pages to do so.

With respect to the requested extension of time, Defendants respectfully request a two-week extension of time, until May 1, 2025, to respond to Plaintiffs' motion for a preliminary injunction, filed on April 3, 2025. *See* ECF Nos. 24-52. If the Court grants the request, Plaintiffs' reply brief would be due on May 8, 2025. *See* Local Civil Rule 6.1.

Defendants need the additional time to properly respond to Plaintiffs' motion and the materials filed in support of their motion, which include many claims, declarations, and exhibits. Defendants' counsel is in the process of conferring with the client agencies to respond to Plaintiffs' submission but requires the additional time to do so. Further, the complex issues involved in this litigation require coordination among multiple components of the federal government, which Defendants need the additional time to accomplish. Additionally, some members of the team in this Office who are working on this matter will be observing the upcoming Passover holiday, and the undersigned AUSA will be on leave for the remainder of this week and part of next week.

Counsel for Plaintiffs have indicated that Plaintiffs do not consent to the requested extension of time (although would consent to an extension of time until April 24) because they are concerned about the harm to the Plaintiffs and their members if Defendants were to cancel, pause, or terminate additional funding to Columbia University before the Court issues its decision.

This is the Defendants' first request for an extension of time.

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With respect to the requested page enlargement, Defendants respectfully request 30 pages for their memorandum of law in opposition to Plaintiffs' motion, the same number of pages that the Court granted Plaintiffs for their memorandum of law in support of their motion. *See* ECF No. 23. This page enlargement is necessary to properly respond to Plaintiffs' memorandum of law. Plaintiffs consent to this request.

Respectfully submitted,

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