

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

AMERICAN ASSOCIATION OF  
UNIVERSITY PROFESSORS—HARVARD  
FACULTY CHAPTER, et al.

*Plaintiffs,*

v.

UNITED STATES DEPARTMENT OF  
DEPARTMENT OF JUSTICE, et al.,

*Defendants.*

Case No. 1:25-CV-10910-ADB

**JOINT MOTION TO STAY DEFENDANTS' DEADLINE TO FILE ANSWER OR  
OTHERWISE RESPOND TO FIRST AMENDED COMPLAINT**

Plaintiffs American Association of University Professors—Harvard Faculty Chapter, et al. and Defendants United States Department of Justice, et al. (collectively, the “Parties”) hereby move this Court to stay Defendants’ deadline to file their Answer or otherwise respond to Plaintiffs’ Amended Complaint, ECF No. 50,<sup>1</sup> until 30 days after the Court has ruled on the parties’ dispositive motions.

In support of the motion, the parties state as follows:

1. Following the Court’s April 28, 2025 Status Conference in the related case, *President and Fellows of Harvard College v. U.S. Dep’t of Health and Human Services, et al.*, No. 25-cv-11048, the Court set a deadline of May 5 for Plaintiffs in this case to file an Amended Complaint, and May 19, 2025 for Defendants in this case to produce the Administrative Record

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<sup>1</sup> Plaintiffs’ (unopposed) Motion for Leave to File Second Amended Complaint (ECF No. 55) is currently pending with the Court. Should the Court allow Plaintiffs’ Motion, the Parties jointly request the same relief with respect to Defendants’ deadline to file their Answer or otherwise respond to Plaintiffs’ Second Amended Complaint (currently filed as ECF No. 55-1).

in this case, ECF No. 49. The Court set a briefing schedule in this case to match that which the Court set in the related *Harvard* case.

2. On May 5, 2025, Plaintiffs filed their Amended Complaint. ECF No. 50.

3. Shortly after Plaintiffs filed their Amended Complaint, Harvard subsequently received a letter from Defendant Linda E. McMahon (dated May 5, 2025) informing Harvard that any future grant applications submitted by Harvard would be denied.

4. Harvard has also received grant award termination letters from several Defendants, including the National Institutes of Health (dated May 6, 2025), the United States Department of Agriculture (dated May 9, 2025); and the Department of Defense, Department of Energy, Department of Housing and Urban Development, and the National Science Foundation (dated May 12, 2025).

5. On May 16, 2025, Plaintiffs filed their unopposed Motion for Leave to File Second Amended Complaint and attached as an Exhibit their proposed Second Amended Complaint, which added allegations addressing each of these letters. ECF Nos. 55, 55-1.

6. The parties have conferred and agreed that all non-privileged materials directly or indirectly considered in the issuance of these letters shall be included in the Administrative Record that will be produced by Defendants on May 19, 2025. In light of this agreement, the current briefing schedule continues to be amenable to the parties.

7. In addition, the parties have conferred and have agreed to stay Defendants' deadline to file their Answer or otherwise respond to Plaintiffs' Amended Complaint, ECF No. 50, of Plaintiffs' Second Amended Complaint (currently, ECF No. 55-1) until 30 days after the Court has ruled on the parties' dispositive motions.

8. In light of the Parties' agreements, the Parties respectfully request that the Court enter an Order staying Defendants' deadline to answer or otherwise respond to Plaintiffs' Amended Complaint or Second Amended Complaint until 30 days after the Court has ruled on the parties' dispositive motions.

Dated: May 20, 2025

Respectfully submitted,

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By: /s/ Joseph M. Sellers

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**CERTIFICATE OF SERVICE**

I hereby certify that this document, filed through the CM/ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

Dated: May 20, 2025

By: /s/ Anuj Khetarpal  
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