

UNITED STATES DISTRICT
COURT DISTRICT OF
MASSACHUSETTS

PRESIDENT AND FELLOWS OF HARVARD
COLLEGE,

Plaintiff,

v.

UNITED STATES DEPARTMENT OF
HOMELAND SECURITY, *et al.*,

Defendants.

Case No. 1:25-cv-11472-ADB

STIPULATION

To simplify this case and narrow the issues in dispute, Defendants stipulate to the following:

1. Defendants agree that the May 22 letter will not be used to revoke Harvard's SEVP certification or Exchange Visitor Program designation. Defendants are currently following the procedures under 8 C.F.R. §§ 214.3, 214.4 and 22 C.F.R. Part 62.

Defendants proposed this stipulation to Plaintiff in an attempt to jointly simplify the case. Defendants also made clear that they were open to counterproposals and a meet and confer. Plaintiff did not accept.

Dated: August 6, 2025

Respectfully submitted,

BRETT SHUMATE
Assistant Attorney General
Civil Division

DREW ENSIGN
Deputy Assistant Attorney General
Office of Immigration Litigation
Civil Division

BRIDGET K. O'HICKEY
Counsel to the Assistant Attorney General
Civil Division

DAVID KIM
CATHERINE M. RENO
CHRISTINA PARASCANDOLA
Senior Litigation Counsel
Office of Immigration Litigation
General Litigation and Appeals Section

s/ Tiberius T. Davis

TIBERIUS DAVIS
Counsel to the Assistant Attorney General
Civil Division
U.S. Department of Justice
P.O. Box 878, Ben Franklin Station
Washington, DC 20044-0878
(202) 514-2000
tiberius.davis@usdoj.gov

Attorneys for Defendants

CERTIFICATE OF SERVICE

I, Tiberius Davis, hereby certify that I served a true copy of the above document upon all counsel of record via this court's electronic filing system and upon any non-registered participants via first class mail.

Dated: August 6, 2025

/s/ Tiberius Davis

TIBERIUS DAVIS

Counsel to the Assistant Attorney General