UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

AMERICAN ASSOCIATION OF UNIVERSITY PROFESSORS, ET AL., Plaintiffs, v. MARCO RUBIO, in his official capacity as Secretary of State, and the DEPARTMENT OF STATE, ET AL., Defendants.	Civil Action No. 1:25-cv-10685-WGY

DEFENDANTS' MOTION FOR LEAVE TO FILE REPLY MEMORANDUM IN SUPPORT OF THEIR MOTION FOR A PROTECTIVE ORDER TO PRECLUDE DISCOVERY THAT CONTRADICTS LIMITATIONS SET BY THE COURT

Pursuant to Local Rule 7.1(b)(3), Defendants, by and through their counsel, respectfully move this Court for leave to file a reply memorandum in support of their June 7, 2025, motion for a protective order. Dkt. 117. On June 9, 2025, Defendants' counsel conferred with counsel for Plaintiffs, who indicated that Plaintiffs consent to this motion.

A copy of the proposed reply memorandum is attached hereto as Exhibit A. Defendants seek leave to file a reply memorandum to respond to a new argument Plaintiffs raised for the first time in their opposition memorandum filed on June 9, 2025. *See* Dkt. 118. The argument relates to whether the deliberative process privilege applies at all in this case and whether the Court's statement at the May 6, 2025, case management conference decided the issue. *See* Exh. A at 1. Accordingly, Defendants respectfully request leave to file the attached reply memorandum.

Respectfully Submitted,

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Dated: June 10, 2025

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