**UNITED STATES DISTRICT COURT**
**DISTRICT OF MASSACHUSETTS**

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| AMERICAN ASSOCIATION OF UNIVERSITY PROFESSORS, ET AL.,<br><br>Plaintiffs,<br><br>v.<br><br>MARCO RUBIO, ET AL.,<br><br>Defendants. | Case No. 1:25-cv-10685 (WGY) |

**PLAINTIFFS' MOTION TO SEAL**

Pursuant to Local Rule 7.2, Plaintiffs respectfully move the Court for leave to file under seal Plaintiff's Proposal for How to Proceed in Light of the First Circuit's Order ("Proposal"), unredacted copies of which were provided to the Court and Defendants on July 13. The Proposal and the accompanying exhibit relate to certain documents at dispute in Defendants' Petition for a Writ of Mandamus and Emergency Motion for Stay. Petition, *In re Marco Rubio, et al.*, No. 25-1658 (1st Cir. July 11, 2025). While Plaintiffs' Proposal discusses those documents only at a very high level of generality, Plaintiffs move to file their Proposal under seal out of an abundance of caution. The undersigned asked counsel for Defendants for their position on this motion last night, but Defendants have not yet taken one.

As the Court is aware, the First Circuit has stayed "any further disclosure of documents for which the government says it has claimed privilege and where waiver is the only basis stated for rejecting the claim of privilege," pending resolution of the petition. Order, *In re Marco Rubio, et al.*, No. 25-1658 (1st Cir. July 10, 2025).

If the Court grants this motion, Plaintiffs will publicly file the portions of the Proposal that do *not* discuss the documents by 6:00 p.m. EST on the next business day. To the extent that

portions of the documents in dispute in the Petition are later unsealed, Plaintiffs will unseal the relevant portions of the Proposal by 6:00 p.m. EST on the next business day. The sealed portions of the Proposal will not be used or disseminated outside of this litigation, nor outside of their intended purpose.

July 14, 2025

Respectfully submitted,

/s/ Ramya Krishnan

Ramya Krishnan
Scott Wilkens
Talya Nevins
Carrie DeCell
Xiangnong Wang
Jackson Busch
Stephany Kim
Alex Abdo
Jameel Jaffer
Knight First Amendment Institute
at Columbia University
475 Riverside Drive, Suite 302
New York, NY 10115
(646) 745-8500
ramya.krishnan@knightcolumbia.org

Ahilan T. Arulanantham (SBN 237841)
Professor from Practice
UCLA School of Law
385 Charles E. Young Dr. East
Los Angeles, CA 90095
(310) 825-1029
arulanantham@law.ucla.edu

*Counsel for Plaintiffs*

Edwina Clarke (BBO 699702)
David Zimmer (BBO 692715)
Zimmer, Citron & Clarke, LLP
130 Bishop Allen Drive
Cambridge, MA 02139
(617) 676-9423
edwina@zimmercitronclarke.com

Noam Biale
Michael Tremonte
Alexandra Conlon
Courtney Gans
Sher Tremonte LLP
90 Broad Street, 23rd Floor
New York, New York 10004
(212) 202-2603
mtremonte@shertremonte.com
nbiale@shertremonte.com

**CERTIFICATE OF SERVICE**

I, the undersigned counsel, certify that on July 14, 2025, I electronically filed the foregoing motion in the United States District Court for the District of Massachusetts using the CM/ECF system. I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

Dated: July 14, 2025

/s/ Ramya Krishnan
Ramya Krishnan