No. 25-1658

IN THE UNITED STATES COURT OF APPEALS
FOR THE FIRST CIRCUIT

In re MARCO RUBIO*, et al.*,

Petitioners.

MARCO RUBIO, in his official capacity as Secretary of State; U.S. DEPARTMENT OF STATE; KRISTI NOEM, in her official capacity as Secretary of Homeland Security; U.S. DEPARTMENT OF HOMELAND SECURITY; TODD LYONS, in his official capacity as Acting Director of U.S. Immigration and Customs Enforcement; DONALD J. TRUMP, in his official capacity as President of the United States; UNITED STATES OF AMERICA,

Petitioners–Defendants,

v.

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS,

Respondent,

AMERICAN ASSOCIATION OF UNIVERSITY PROFESSORS; AMERICAN ASSOCIATION OF UNIVERSITY PROFESSORS-HARVARD FACULTY CHAPTER; AMERICAN ASSOCIATION OF UNIVERSITY PROFESSORS AT NEW YORK UNIVERSITY; RUTGERS AMERICAN ASSOCIATION OF UNIVERSITY PROFESSORS-AMERICAN FEDERATION OF TEACHERS; MIDDLE EAST STUDIES ASSOCIATION,

Real-Parties-in-Interest–Plaintiffs.

MOTION FOR LEAVE TO FILE REPLY IN SUPPORT OF PETITION FOR A WRIT OF MANDAMUS

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The government respectfully requests leave to file the attached reply in support of its petition for a writ of mandamus. The government requested plaintiffs' position on this motion but, as of the time of this filing, the government has yet to receive a response.

The attached reply is well under half the word limit for a mandamus petition and response, consistent with the general rule for replies, *see* Fed. R. App. P. 27(d)(2), 32(a)(7), and addresses points raised by court's submission and the plaintiffs' supplemental answer.

Respectfully submitted,

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s/ Amanda L. Mundell
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JULY 2025

CERTIFICATE OF COMPLIANCE

Pursuant to Federal Rule of Appellate Procedure 32(g), I hereby certify that this filing complies with the limit of Federal Rule of Appellate Procedure 27(d)(2)(A) because it totals 88 words. I further certify that this petition complies with the typeface and type-style requirements of Federal Rules of Appellate Procedure 27(d)(1)(E), 32(a)(5), and 32(a)(6) because it has been prepared using Microsoft Word 2016 in a proportionally spaced typeface, 14-point Garamond font.

s/ Amanda L. Mundell
AMANDA L. MUNDELL

CERTIFICATE OF SERVICE

I hereby certify that on July 15, 2025, I electronically filed the foregoing with the Clerk of the Court by using the appellate CM/ECF system. Service has been accomplished via email to the following counsel:

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The district court has been provided with a copy of this reply in support of the petition for writ of mandamus pursuant Federal Rule of Appellate Procedure 21(a).

s/ Amanda L. Mundell
AMANDA L. MUNDELL