

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

CHINMAY DEORE, et al.,

Plaintiffs,

v.

KRISTI NOEM, et al.,

Defendants.

Case No. 2:25-cv-11038

Hon. Stephen J. Murphy, III

Mag. J. David R. Grand

**PLAINTIFFS' SUPPLEMENTAL STATEMENT**

On April 10, 2025, Plaintiffs filed a Verified Complaint (ECF No. 1, PageID.1) and an Emergency Motion for Temporary Restraining Order and Preliminary Injunction (ECF No. 2, PageID.49) (hereinafter the “Motion”).<sup>1</sup> In their Verified Complaint and the Motion, Plaintiffs made clear that they are not challenging the revocation of their F-1 visas in this case, assuming—without actually knowing—that their visas had been revoked. Plaintiffs file this supplemental statement to advise the Court that, since filing the Verified Complaint and Motion, two Plaintiffs, Qiuyi Yang and Yogesh Joshi, have learned that the U.S. Department

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<sup>1</sup> Counsel for Defendants has not yet appeared in this matter. Plaintiffs’ counsel has spoken to the U.S. Attorney’s Office for the Eastern District of Michigan, who has confirmed that they are aware of this matter. Plaintiffs’ counsel will send a copy of this Supplemental Statement to the U.S. Attorney’s Office via electronic mail. Plaintiffs are also working diligently to effect service pursuant to Fed. R. Civ. P. 4.

of State has, in fact, formally revoked their F-1 visas.

Both Plaintiffs have received an email from the consulates that first issued their F-1 visas notifying them that their visa was revoked “under Section 221(i) of the United States Immigration and Nationality Act, as amended.” *See* Exhibits A and B. The email to Qiuyi Yang is dated April 10, 2025, six days after she learned that her F-1 student status had been terminated. *See* Verified Compl, Ex. E, PageID.46.<sup>2</sup> The email to Yogesh Joshi is dated April 11, 2025, three days after he learned that his F-1 student status had been terminated. *See* Verified Compl, Ex. C, PageID.41.<sup>3</sup> As of this filing, Xiangyun Bu has not received a revocation email from his consulate. Chinmay Deore was never issued an F-1 visa, as he changed to F-1 status while already in the country. *See* Verified Compl., ¶42 (ECF No. 1, PageID.16).

Plaintiffs apprise this Court of these developments out of an abundance of caution, because of the fast-moving nature of this case, and to ensure that the Court has before it the latest facts known to Plaintiffs. However, **these factual developments are not material to Plaintiffs’ claims**. As Plaintiffs explained in their Verified Complaint and Motion, the revocation of a visa is not a valid basis for

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<sup>2</sup> The email to Qiuyi Yang is date-stamped before Plaintiffs filed the Verified Complaint and Motion, but regrettably, she did not discover the email until after filing in a secondary email address inbox.

<sup>3</sup> The email to Yogesh Joshi was sent after Plaintiffs filed the Verified Complaint and Motion.

the agency-initiated termination of F-1 student status. *See* Verified Compl., ¶¶33-34 (ECF No. 1, PageID.13); Motion, pp. 19-20 (ECF No. 2, PageID.76). Thus, whether or not any Plaintiff's visa has been revoked, Defendants have unlawfully terminated their F-1 student status without invoking or satisfying any of the bases for termination set forth in 8 C.F.R. § 214.1(d).

These developments also underscore the need for emergency relief. Federal government agencies are taking additional (*post-hoc*) steps to button-up their arbitrary status terminations and put Plaintiffs at further risk of unlawful arrest, detention, and deportation.

Respectfully submitted,

By: /s/ Ramis J. Wadood

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