

FOR THE DISTRICT OF MASSACHUSETTS

Rümeysa Öztürk,

Plaintiff,

v.

PATRICIA HYDE, et al.,

Defendants.

Civil Action No. 1:25-cv-12334-DJC

DECLARATION OF RÜMEYSA ÖZTÜRK

I, Rümeysa Öztürk, declare as follows:

1. I am a doctoral student at Tufts University in the final year of my Ph.D. I have submitted previous declarations in this case focused on my March 25, 2025 detention and details regarding my custody.
2. Although I did not learn of it at the time, I now know that immigration authorities terminated my record in the SEVIS system on March 25, 2025, after they unlawfully detained me. I am submitting this declaration in support of my request that the Court grant preliminary injunctive relief that would require the reactivation of my SEVIS record.
3. I am pursuing this relief at this time because I wish to work as a research assistant on a project with my advisor, Associate Professor Sara Johnson. It is my understanding that I can do so only if my SEVIS record is reactivated. This request is time sensitive because I am already missing out on important stages in the development of this project, and because I expect to graduate from Tufts

University in February or May 2026, and these are thus the final months in which I will have any opportunity to engage in on-campus research assistant work.

4. Research assistantships like this one have been important throughout the course of my graduate studies, both as an essential part of my graduate education and as a source of income.

5. The particular project that I want to work on with Professor Johnson is grant-funded and involves the evaluation of a podcast for youth. I first heard about the project some months before I was detained, and although it had not yet been funded at that time, my advisor and I were immediately looking forward to the possibility of my working on it as a research assistant.

6. This particular research assistantship opportunity has been especially interesting to me because my expertise and skill set align closely with the project, and I can both learn from and contribute significantly to this project.

7. The project involves examining how children learn from and are influenced by media, the subject at the heart of my scholarship. Because my research has focused more on television programming and social media and this project involves podcasts, I know that this project will broaden my experience in my field of study in important ways. I am also confident that, based on my skill set, passion, and specialized expertise in the field of children's and adolescents' media, I am well-positioned to provide significant and demonstrable contributions to this project.

8. The fact that this work involves program evaluation is also of interest to me. The ability to evaluate the effect of media content and curriculum on children is an important research skillset in the field of child and youth development, so much so that at the time I was taken into custody, I was auditing a course on Program Evaluation. Working as a research assistant on this particular project will allow me to deepen my program evaluation skills.

9. In addition to ways that this project will further my graduate education, this work would afford me an opportunity to work on a sustained project with my “lab mates” (meaning the small group of scholars that I am part of, supervised by Professor Johnson). Collaboration and peer learning are other important aspects of doctoral studies.

10. I know that I am missing out on an important educational opportunity by being unable to work as a research assistant on this project. Because I expect to complete my Ph.D program in the coming months, I also will not have the chance to work as a research assistant or teaching assistant any more during my time at Tufts if my SEVIS record is not reactivated soon.

11. Since March 25, I have already lost many research and teaching opportunities, along with a significant amount of time, conferences, and other educational opportunities. For example, teaching is an important experience for graduate students, and because of my detention and termination of my SEVIS, I did not teach a class that I was scheduled to teach to high school students this summer. As a student in the last year of my doctoral studies, these are the last months in

which I can benefit from the experiences that I stand to gain through a research assistantship like the opportunity I now have with Professor Johnson.

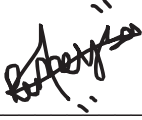
12. It has been disheartening to me that, even though I have been back in campus since May, I have not been able to work as a research assistant or teaching assistant at my university because of the termination of my SEVIS record. The termination of that record has caused me direct educational harm and a loss of career opportunities. As a woman and an international scholar who has experience as an international student in other countries, I had never before felt discouraged about my education until my detention on March 25. Since my release, the ongoing harm of having to forego educational and career opportunities due to my terminated SEVIS record has compounded the sense of loss and injustice that I feel.

13. I understand that there is a regulation that lists certain reasons why the government may terminate a student's status, all of which are inapplicable to me. I have not received any waiver of inadmissibility, nor had any such waiver revoked; no private bill has been introduced on my behalf to confer me permanent resident status; and no notice has been published in the Federal Register revoking my student status.

14. If my SEVIS record were reactivated, I would immediately seek to join Professor Johnson's project as a research assistant, while continuing my progress towards the completion of my Ph.D.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed on October 16, 2025 in Somerville, Massachusetts.

A handwritten signature in black ink, appearing to read 'Rümeysa Öztürk', is written above a horizontal line.

Rümeysa Öztürk