

CHAD MIZELLE
Acting Associate Attorney General
ABHISHEK KAMBLI
Deputy Associate Attorney General
BRETT A. SHUMATE
Assistant Attorney General
Civil Division
YAAKOV M. ROTH
Principal Deputy Assistant Attorney General
Civil Division
SEAN SKEDZIELEWSKI
Counsel to the Assistant Attorney General
Civil Division
ELIANIS N. PÉREZ
Assistant Director
NICOLE P. GRANT
Senior Litigation Counsel
AYSHA T. IQBAL
Trial Attorney
Office of Immigration Litigation
General Litigation and Appeals Section
Attorneys for the United States

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF OKLAHOMA**

1. UNITED STATES OF AMERICA,

Plaintiff,

v.

1. STATE OF OKLAHOMA,

Defendant.

CIVIL No. 6:25-cv-00265-RAW

**JOINT MOTION FOR ENTRY OF
CONSENT JUDGMENT**

1. On August 5, 2025, Plaintiff filed its Complaint against Defendant, the State of Oklahoma.

2. The Parties agree that the Court has jurisdiction over this action under 28 U.S.C. §§ 1331 and 1345 and venue is proper under 28 U.S.C. § 1391.

3. In the Complaint, Plaintiff challenged Okla. Stat., tit. 70, § 3242 and Oklahoma State Regents for Higher Education (“OSRHE”) Policy § 3.18.6 as expressly preempted by federal immigration law at 8 U.S.C. §§ 1623, 1621(d).

4. Plaintiff requested that this Court enter a judgment declaring that Okla. Stat., tit. 70, § 3242 and OSRHE Policy § 3.18.6 violate the Supremacy Clause and are therefore invalid.

5. Plaintiff further requested that this Court issue a permanent injunction that prohibits the Defendant, as well as its successors, agents, and employees, from enforcing Okla. Stat., tit. 70, § 3242 and OSRHE Policy § 3.18.6.

6. Plaintiff and Defendant agree that this Court has the authority to provide the requested relief under the Supremacy Clause, U.S. Const. Art. VI, cl. 2, as well as 28 U.S.C. §§ 1651, 2201, and 2022, and its inherent equitable powers.

7. Plaintiff and Defendant agree that Okla. Stat., tit. 70, § 3242 and OSRHE Policy § 3.18.6 are preempted by 8 U.S.C. §§ 1623, 1621(d).

8. Plaintiff and Defendant request that the Court enter a final judgment declaring that Okla. Stat., tit. 70, § 3242 and OSRHE Policy § 3.18.6 violate the Supremacy Clause and are therefore invalid.

9. Plaintiff and Defendant, further request that the Court enter a permanent injunction prohibiting the Defendant, as well as its successors, agents and employees, from enforcing Okla. Stat., tit. 70, § 3242 and OSRHE Policy § 3.18.6.

10. The Parties agree that each will bear their own costs and fees.

DATED: August 5, 2025

Respectfully submitted,

CHAD MIZELLE
Acting Associate Attorney General

ABHISHEK S. KAMBLI
Deputy Associate Attorney General

BRETT A. SHUMATE
Assistant Attorney General

YAAKOV M. ROTH
Principal Deputy Assistant Attorney General

SEAN SKEDZIELEWSKI
Counsel to the Assistant Attorney General

/s/ Elianis N. Perez
ELIANIS N. PÉREZ
Assistant Director
United States Department of Justice
Office of Immigration Litigation
General Litigation and Appeals
Civil Division
P.O. Box 868, Ben Franklin Station
Washington, D.C. 20044
Telephone: (202) 616-9124
Fax: (202) 305-7000
Email: Elianis.Perez@usdoj.gov

NICOLE P. GRANT
Senior Litigation Counsel
AYSHA T. IQBAL
Trial Attorney

Attorneys for the United States

GENTNER DRUMMOND
Attorney General of Oklahoma

*s/Gentner Drummond
GENTNER DRUMMOND, OBA #16645
Attorney General

GARRY M. GASKINS, II
OBA #20212
Solicitor General

OFFICE OF THE ATTORNEY GENERAL
STATE OF OKLAHOMA
313 NE 21st Street
Oklahoma City, OK 73105
(405) 521-3921
(405) 522-4534 (fax)
gentner.drummond@oag.ok.gov
garry.gaskins@oag.ok.gov

*signed with permission

Attorneys for the State of Oklahoma