

**UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF MASSACHUSETTS**

DR. SHIVA AYYADURAI

Plaintiff,

v.

WILLIAM FRANCIS GALVIN, in his official
capacity as Secretary of the Commonwealth of
Massachusetts;

TODD BLANCHE, in his official capacity as
Acting Attorney General of the United States; and

HARMEET K. DHILLON, in her official capacity
as Assistant Attorney General for the Civil Rights
Division.

Defendants.

Civil Action Case No. 1:26-cv-
13329-BEM

**PLAINTIFF’S MOTION FOR PERMISSION TO FILE REPLY BRIEF IN SUPPORT
OF EMERGENCY MOTION FOR PRELIMINARY INJUNCTION**

Plaintiff Dr. Shiva Ayyadurai, proceeding pro se, respectfully moves this Court pursuant to Local Rule 7.1(b)(3) for leave to file a Reply Brief in support of his Emergency Motion for Preliminary Injunction (Dkt. 2).

In support of this Motion, Plaintiff states as follows:

1. On August 6, 2026, Defendant William Francis Galvin filed an Opposition to Plaintiff’s Motion for Preliminary Injunction.

2. Federal Defendants Todd Blanche and Harmeet K. Dhillon **failed to file an opposition or request an extension prior to the Court's August 7, 2026 deadline** (Dkt. 7).
3. A brief Reply is necessary to address jurisdictional misstatements regarding Rooker-Feldman and to clarify that 42 U.S.C. § 1983 provides the explicit federal cause of action to enforce the preservation mandates of 52 U.S.C. § 20701.
4. Plaintiff's proposed Reply Brief is concise, non-repetitive, and directly aids the Court in resolving the emergency motion prior to the 2026 election cycle.
5. A true and accurate copy of Plaintiff's Proposed Reply Brief is attached hereto as **Exhibit A.**

WHEREFORE, Plaintiff respectfully requests that the Court grant leave to file the attached Reply Brief and direct the Clerk to enter Exhibit A on the official docket.

Respectfully submitted,

Dated: August 16, 2026



Dr. Shiva Ayyadurai, Pro Se
701 Concord Avenue
Cambridge, MA 02138
E: vashiva@cytosolve.com