

1 Robert B. Jobe (Cal. State Bar #133089)  
 Sarah B. Castello (Cal. State Bar #244735)  
 2 LAW OFFICE OF ROBERT B. JOBE  
 550 Kearny Street, Suite 200  
 3 San Francisco, CA 94108  
 (415) 684-7293 (phone)  
 4 (415) 684-7293 (fax)  
 federal@jobelaw.com

5 Attorneys for Plaintiff.

6 UNITED STATES DISTRICT COURT  
 7 EASTERN DISTRICT OF CALIFORNIA  
 8

9 PRITPAL SINGH MANN,

10 )  
11 )  
12 )  
13 )  
14 )  
15 )  
16 )  
17 )  
18 )  
19 )  
20 )  
21 )  
22 )  
23 )  
24 )  
25 )  
26 )  
27 )  
28 )

No. 2:13-cv-00703-GEB-EFB

JOINT STIPULATION AND PROPOSED  
ORDER TO DISMISS REMAINING  
CAUSE OF ACTION AND ISSUE A  
FINAL ORDER

V.

Honorable Judge Garland E. Burrell, Jr.

GERARD HEINAUER, *et al.*,

Defendants.

Date: None  
Time: None  
Courtroom: None

18 This is an immigration case in which Plaintiff challenges the USCIS's delay in  
19 adjudicating his Form I-485, Application for Adjustment of Status. On July 3, 2014, the Court  
20 issued an Order denying Plaintiff's partial motion for summary judgement and granting  
21 Defendants' partial order for summary judgment. With this Order, the Court decided only one  
22 claim brought in Plaintiff's initial complaint.

23 The parties hereby stipulate to voluntarily dismiss the remaining claim with prejudice and  
24 agree that there are no outstanding claims in this matter. The parties also hereby request that the  
25 Court now issue a final judgment in order that Plaintiff may file a direct appeal with the U.S.  
26 Appeals Court for the Ninth Circuit. Each party is responsible for its own costs and attorney's  
27  
28

1 fees.

2  
3 Dated: August 25, 2014

Respectfully submitted,

4 LAW OFFICE OF ROBERT B. JOBE

5 /s/ Robert B. Jobe  
Robert B. Jobe  
Sarah B. Castello  
Law Office of Robert B. Jobe

7 Attorneys for Plaintiff

9 BENJAMIN B. WAGNER  
United States Attorney

11 AUDREY B. HEMESATH  
Assistant U.S. Attorney

12 STUART F. DELERY  
Assistant Attorney General

14 WILLIAM C. PEACHEY  
Director, District Court Section,  
Office of Immigration Litigation

16 WILLIAM C. SILVIS  
Assistant Director  
Office of Immigration Litigation

17 /s/ Patricia E. Bruckner  
18 PATRICIA E. BRUCKNER  
Trial Attorney  
United States Department of Justice  
Civil Division  
Office of Immigration Litigation  
District Court Section  
P.O. Box 868, Ben Franklin Station  
21 Washington, D.C. 20044  
22 (202) 532-4325  
(202) 305-7000 (fax)  
patricia.bruckner@usdoj.gov

23  
24  
25  
26  
27  
28

1 **[PROPOSED] ORDER**

2 Pursuant to stipulation and for the reasons stated therein, IT IS HEREBY ORDERED that  
3 the any and all remaining claims in this matter be dismissed with prejudice and that the Court's  
4 final order is hereby issued on this date in order that Plaintiff may file a direct appeal with the  
U.S. Appeals Court for the Ninth Circuit. Each party is responsible for its own costs and  
attorney's fees.

5 IT IS SO ORDERED.

6 Dated: August 27, 2014

7  
8   
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
GARLAND E. BURRELL, JR.  
Senior United States District Judge