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7 Attorneys for Defendants

8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA
 10 SAN FRANCISCO DIVISION

11
 12 JEIMY AMAYA UNI,

13 Plaintiff,

14 v.

15 UNITED STATES DEPARTMENT OF
 16 HOMELAND SECURITY, *et al.*,

17 Defendants.

C 3:24-cv-03801-LJC

**STIPULATION TO STAY PROCEEDINGS;
~~PROPOSED~~ ORDER**

18 The parties, through their undersigned attorneys, hereby stipulate and respectfully request the
 19 Court to stay proceedings in this case for a limited time, until July 10, 2025. The parties make this joint
 20 request because they are pursuing an administrative resolution that may render further litigation of this
 21 case unnecessary.

22 1. Plaintiff filed this mandamus action seeking adjudication of her Form I-589, Application
 23 for Asylum and for Withholding of Removal. United States Citizenship and Immigration Services
 24 (“USCIS”) has scheduled the asylum interview to take place on March 12, 2025. USCIS agrees to work
 25 diligently towards completing adjudication of Plaintiff’s application, absent the need for further
 26 adjudicative action or unforeseen circumstances that would require additional time for adjudication.

27
 28 Stip to Stay Proceedings
 C 3:24-cv-03801-LJC

1 2. Plaintiff agrees to submit all supplemental documents and evidence no later than seven to
2 ten days prior to the interview, pursuant to USCIS policy. Plaintiff agrees that the failure to timely
3 submit this evidence may result in the rescheduling of the interview at no fault of USCIS.

4 3. If needed by Plaintiff or her dependent(s), Plaintiff shall bring her own interpreter to her
5 asylum interview. *See* [https://www.uscis.gov/newsroom/alerts/affirmative-asylum-applicants-must-](https://www.uscis.gov/newsroom/alerts/affirmative-asylum-applicants-must-provide-interpreters-starting-sept-13)
6 [provide-interpreters-starting-sept-13](https://www.uscis.gov/newsroom/alerts/affirmative-asylum-applicants-must-provide-interpreters-starting-sept-13). Plaintiff recognizes that failure to bring an interpreter to her
7 interview may result in the interview being rescheduled at no fault of USCIS.

8 4. Upon receipt of USCIS' decision, Plaintiff agrees to voluntarily dismiss this case.

9 5. The parties agree to bear their own attorney fees and costs.

10 Accordingly, the parties stipulate and request that the proceedings in this case be stayed until
11 July 10, 2025, at which time the parties will file a joint status report with the Court. At that time, the
12 parties may request a further continuance of the stay of proceedings, dismissal of the litigation if
13 appropriate, or placement of the case back on the Court's active docket. A stay of proceedings in this
14 case will benefit the parties and conserve the Court's resources while the parties pursue a potential
15 administrative resolution.
16

17
18 Dated: November 22, 2024

Respectfully submitted¹,

ISMAIL J. RAMSEY
United States Attorney

/s/ Elizabeth D. Kurlan

ELIZABETH D. KURLAN
Assistant United States Attorney
Attorneys for Defendants

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27 _____
28 ¹ In accordance with Civil Local Rule 5-1(i)(3), the filer of this document attests that all signatories listed below concur in the filing of this document.

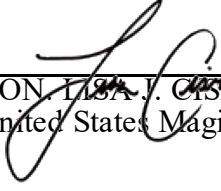
1 Dated: November 22, 2024

/s/ Laure Dachelet
LAURE DACHELET
Political Asylum Lawyers
Attorney for Plaintiff

4 ~~PROPOSED~~ ORDER

5 Pursuant to stipulation, IT IS SO ORDERED.

8 Date: November 22, 2024


HON. LISA J. CISNEROS
United States Magistrate Judge