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8 Attorneys for Defendants

9 UNITED STATES DISTRICT COURT  
10 NORTHERN DISTRICT OF CALIFORNIA  
11 OAKLAND DIVISION

12 RAMIRO M. JERONIMO AGUILAR,

13 Plaintiff,

14 v.

15 UR JADDOU, in her official capacity as  
16 Director of United States Citizenship Services  
(USCIS), USCIS,

17 Defendants.

4:23-cv-04380 DMR

**STIPULATION TO STAY PROCEEDINGS;  
ORDER**

18  
19 The parties, through their undersigned attorneys, hereby stipulate and respectfully request the  
20 Court to stay proceedings in this case for a limited time, until April 17, 2024. The parties make this joint  
21 request because they are pursuing an administrative resolution that may render further litigation of this  
22 case unnecessary.

23 Plaintiff filed this mandamus action seeking adjudication of their Form I-589, Application for  
24 Asylum and for Withholding of Removal. United States Citizenship and Immigration Services  
25 (“USCIS”) has scheduled the asylum interview to take place on December 19, 2023, and it agrees to  
26 work diligently towards completing adjudication of Plaintiff’s petition, absent the need for further  
27 adjudicative action or unforeseen circumstances that would require additional time for adjudication. If  
28

Stip to Stay Proceedings  
4:23-cv-04380 DMR

1 USCIS cancels or reschedules Plaintiff's interview, USCIS will reschedule the interview for a date not  
2 more than four weeks from the originally scheduled date, absent unforeseen or exceptional  
3 circumstances.

4       Upon receipt of USCIS' decision, Plaintiff agrees to voluntarily dismiss this case and, in that  
5 event, the parties agree to bear their own attorney's fees and costs. Accordingly, the parties stipulate and  
6 request that the proceedings in this case be stayed until April 17, 2024, at which time the parties will file  
7 a joint status report with the Court. At that time, the parties may request a further continuance of the stay  
8 of proceedings, dismissal of the litigation if appropriate, or placement of the case back on the Court's  
9 active docket. A stay of proceedings in this case will benefit the parties and conserve the Court's  
10 resources while the parties pursue a potential administrative resolution.

12 Dated: November 14, 2023

Respectfully submitted<sup>i</sup>,

13 ISMAIL J. RAMSEY  
14 United States Attorney

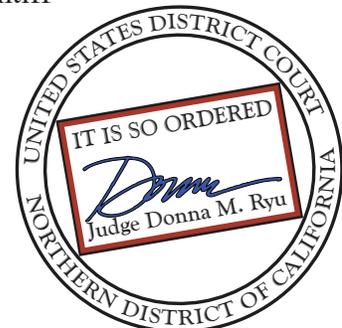
15 /s/ Elizabeth Kurlan  
16 ELIZABETH D. KURLAN  
17 Assistant United States Attorney  
Attorneys for Defendants

18 Dated: November 14, 2023

19 /s/ Jessica Arena  
20 JESSICA T. ARENA  
Law Office of Jessica T. Arena  
Attorney for Plaintiff

21 **ORDER**

22 Pursuant to stipulation, IT IS SO ORDERED.



24 Date: November 15, 2023

25  
26 HON. DONNA M. RYU  
United States Chief Magistrate Judge

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