

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

)	
CHRISTINA CARRIERA,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 1:18-cv-02406-APM
)	
UNITED STATES CITIZENSHIP AND)	
IMMIGRATION SERVICES,)	
)	
Defendant.)	
)	

JOINT MOTION TO HOLD CASE IN ABEYANCE

COME NOW Plaintiff and Defendant (“parties”), by and through their undersigned counsel, and hereby move the Court for an Order holding the instant matter in abeyance for one-hundred twenty (120) days, to April 8, 2019, at which time the parties will file a joint status report with the Court or dismiss the litigation, as appropriate.

As grounds for this motion, the parties state as follows:

1. On October 21, 2018, Plaintiff filed her Complaint in this matter. ECF No. 1. On November 1, 2018, Plaintiff served the Complaint on Defendant. In accordance with the Federal Rule of Civil Procedure 12(a)(2), Defendant’s response to Plaintiff’s Complaint is due on or around December 31, 2018.
2. On November 28, 2018 and November 30, 2018, the parties conferred regarding the instant matter. During these discussions, Defendant’s counsel indicated to Plaintiff’s counsel that USCIS was amenable to reopening its August 30, 2018, decision denying Plaintiff’s May 21, 2018 visa petition, issuing a Notice of Intent to Deny (“NOID”) to Plaintiff, and giving Plaintiff the opportunity to respond to the NOID.

3. Pursuant to these discussions, the parties agreed to hold the instant matter in abeyance for one-hundred twenty (120) days, to April 8, 2019, at which time the parties will file a joint status report with the Court or dismiss the litigation, as appropriate. While the matter is held in abeyance, the parties intend for the following process to occur:
 - a. Defendant will issue the NOID within thirty (30) days of entry of the Court's Order granting the instant motion;
 - b. Plaintiff will mail her response to the NOID within thirty (30) days of receiving the NOID, and Plaintiff's counsel will provide a tracking number to Defendant's counsel (Samuel Go) for Plaintiff's response to the NOID; and
 - c. Defendant will issue a decision within sixty (60) days of receiving Plaintiff's response to the NOID.
4. Pursuant to LCvR 7(m), counsel for Defendant, Samuel Go, met and conferred with counsel for Plaintiff, Michael Piston, on November 28, 2018 and November 30, 2018.

WHEREFORE, the parties respectfully move this Court to enter an Order holding the instant matter in abeyance for one-hundred twenty (120) days.

DATED: December 4, 2018

Respectfully submitted,

JOSEPH H. HUNT
Assistant Attorney General

WILLIAM C. PEACHEY
Director

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Attorneys for Defendant

CERTIFICATE OF SERVICE

I certify that on December 4, 2018, I electronically filed the foregoing JOINT MOTION TO HOLD CASE IN ABEYANCE with the Clerk of Court by using the CM/ECF system, which will provide electronic notice and an electronic link to this document to the following attorney of record:

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DATED: December 4, 2018

s/ Samuel P. Go

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