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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEVEDA**

YANITA KUZOVA and YAVOR
KUZOV, individually and on behalf of
all similarly situated individuals

Plaintiffs

vs.

UNITED STATES DEPARTMENT
OF HOMELAND SECURTY, et al.

Defendants

Civil Action
CASE NO.: 2:10-cv-01711-CMN-
LRL

JUDGE: NAVARRO
MAGISTRATE: JOHNSON

**PLAINTIFF YAVOR KUZOV'S
MOTION FOR DISMISSAL OF
COUNT ONE OF THE
COMPLAINT AS IT RELATES TO
HIM DUE TO NATURALIZATION**

COMES NOW Plaintiff Yavor Kuzov, through his attorney of record,
Nicolette Glazer Esq., and in support of this motion for partial dismissal of this
matter state as follows:

1. On 2 October 2010 Yanita Kuzova and Yavor Kuzov, individually
and on behalf of all similarly situated individuals, filed a lawsuit against the

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CENTURY CITY, CALIFORNIA 90067

1 named defendants in the United State District Court for the Southern District of
2 Nevada, alleging causes of actions for *de novo* judicial determination of
3 application for naturalization pursuant to 8 U.S.C. §1447(b); writ of mandamus
4 for failure to adjudicate a properly filed application for naturalization within 120
5 days after examination; unreasonable delay under the Administrative Procedures
6 Act, and attorney fees and costs under EAJA.
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9 2. After the filing of the complaint Defendant USCIS granted Plaintiff
10 Yavor Kuzov's application for naturalization, a relief USCIS had previously
11 refused to accord to Plaintiff without good cause. *See* Exhibit A.
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2 WHEREFORE Plaintiff Yavor Kuzov respectfully requests that this Court
3 dismiss Count One of the complaint [8 U.S.C. §1447(b) relief] as it relates to
4 him pursuant to FRAP, Rule 42(b) since the request has been rendered moot by
5 the grant of naturalization.
6

7 Respectfully submitted by
8 LAW OFFICES OF LARRY R. GLAZER
9 _____
10 *s/Nicolette Glazer*

11 Nicolette Glazer, CA Bar # 208713
12 1875 Century Park East, Suite #700
13 Century City, California 90067
14 ATTORNEY FOR PLAINTIFFS

15 **IT IS SO ORDERED** this 5th day of April, 2011.

16 
17 _____
18 Gloria M. Navarro
19 United States District Judge
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DECLARATION OF INTENTION



DECLARATION OF INTENTION

No. 33789107

U.S.G.S Registration No. A047642887

Personal description of holder as of date of naturalization:

Date of birth: **JANUARY 30, 1990**

Sex: **MALE**

Height: **5 feet 7 inches**

Marital status: **SINGLE**

Country of former nationality: **BULGARIA**

I certify that the description given is true, and that the photograph affixed hereto is a likeness of me.

(Complete and affix signature of holder)

It is hereby declared pursuant to an application filed with the Secretary of Homeland Security

at **ATLANTA GEORGIA**

The Secretary hereby found that:

YAVOR GEORGIEV KUZOV

residing at: **ATLANTA GEORGIA**

having complied in all respects with all of the applicable provisions of the naturalization laws of the United States, being entitled to be admitted as a citizen of the United States, and having taken the oath of allegiance at a ceremony conducted by

U.S. CITIZENSHIP AND IMMIGRATION SERVICES

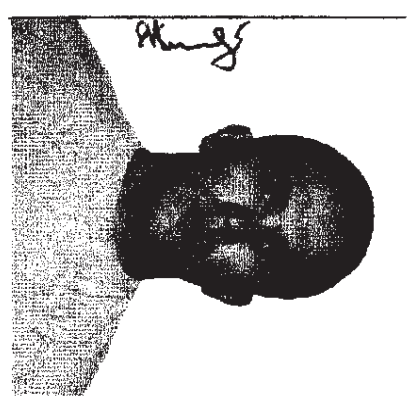
at: **FORT BENNING, GEORGIA**

on: **DEC 08 2010**

such person is admitted as a citizen of the United States of America.

Alvin M. Hughes, Director

U. S. Citizenship and Immigration Services



Yavor Kuzov

DEPARTMENT OF HOMELAND SECURITY