

1 BENJAMIN C. MIZER
 Principal Deputy Assistant Attorney General
 2 U.S. Department of Justice
 Civil Division
 3 JOHN S. HOGAN
 Assistant Director
 4 SAMUEL P. GO
 Senior Litigation Counsel
 5 Office of Immigration Litigation
 P.O. Box 878, Ben Franklin Station
 6 Washington, DC 20044
 Telephone: 202) 353-9923
 7 Facsimile: (202) 616-4950
 E-mail: Samuel.Go@usdoj.gov

8 Attorneys for Defendants

9 **UNITED STATES DISTRICT COURT**
 10 **DISTRICT OF NEVADA**

11 JESSICA LYNN TKACZ,)
)
 12 Plaintiff,)
)
 13 vs.)
)
 14 JEH JOHNSON, Secretary, U.S. Department)
 of Homeland Security; JEANNE KENT¹,)
 15 Field Office Director, United States)
 Citizenship and Immigration Services)
 16 (“USCIS”) Las Vegas Field Office; DANIEL)
 G. BOGDEN, U.S. Attorney, Nevada,)
 17)
 18 Defendants.)

Case No. 2:14-cv-00092-RFB-CWH

**JOINT STIPULATION TO CONTINUE THE
 HEARING DATE FOR CROSS-MOTIONS
 FOR SUMMARY JUDGMENT AND
 PLAINTIFF’S MOTION TO AMEND**

[Proposed Order Filed Concurrently]

26 ¹ Pursuant to Federal Rule of Civil Procedure 25(d), Jeanne Kent, Field Office Director, USCIS Las Vegas Field Office, is substituted for her predecessor.

1 **JOINT STIPULATION TO CONTINUE THE HEARING DATE FOR CROSS-MOTIONS**
2 **FOR SUMMARY JUDGMENT AND PLAINTIFF’S MOTION TO AMEND**

3 IT IS HEREBY STIPULATED that the hearing date on the parties’ Cross-Motions for
4 Summary Judgment and Plaintiff’s Motion to Amend Complaint be continued from August 27, 2015 to
5 September 24, 2015 or September 25, 2015. Defendant’s counsel, Mr. Samuel Go, has a scheduling
6 conflict with the August 27, 2015 hearing date. On August 17, 2015, Mr. Go contacted Mr.
7 Constantinos Gus Fountas, Plaintiff’s counsel, asking Mr. Fountas if he would stipulate to continue the
8 August 27, 2015 hearing to a later date. Mr. Fountas agreed to continue the hearing date as requested,
9 and the parties thus stipulate to continue the hearing date on the parties’ Cross-Motions for Summary
10 Judgment and Plaintiff’s Motion to Amend Complaint from August 27, 2015 to September 24, 2015 or
11 September 25, 2015. Alternatively, in the event the Court is not available on the proposed dates, the
12 parties are amenable to continuing the hearing date to September 22, 2015; September 23, 2015;
13 September 29, 2015; or October 1, 2015.

14 Dated: August 18, 2015

Respectfully submitted,

15 s\ Samuel P. Go
16 SAMUEL P. GO
17 Senior Litigation Counsel
18 United States Department of Justice
19 Civil Division
20 Office of Immigration Litigation
21 P.O. Box 878, Ben Franklin Station
22 Washington, DC 20530
23 Telephone: (202) 353-9923
24 Facsimile: (202) 616-4950
25 Email: samuel.go@usdoj.gov

Attorney for Defendants

26 Dated: August 18, 2015

s\Constantinos Gus Fountas (with permission)
CONSTANTINOS GUS FOUNTAS
3340 Pepper Ln. Ste. 103
Las Vegas, NV 89120
Telephone: (702) 451-8815
Facsimile: (702) 450-9925
Email: fountaslaw@gmail.com

Attorney for Plaintiff

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing JOINT STIPULATION TO CONTINUE THE HEARING DATE FOR CROSS-MOTIONS FOR SUMMARY JUDGMENT AND PLAINTIFF'S MOTION TO AMEND was served to the following individuals on this date and by the below method of service:

Electronic Case Filing:

Constantinos Gus Fountas
Fountas & Associates
3340 Pepper Ln., Ste. 103
Las Vegas, NV 89120

Dated this 18th day of August 2015.

/s/ Samuel P. Go
SAMUEL P. GO
Senior Litigation Counsel

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

JESSICA LYNN TKACZ,)
)
 Plaintiff,)
)
 vs.)
)
 JEH JOHNSON, Secretary, U.S. Department)
 of Homeland Security; JEANNE KENT, Field)
 Office Director, United States Citizenship and)
 Immigration Services (“USCIS”) Las Vegas)
 Field Office; DANIEL G. BOGDEN, U.S.)
 Attorney, Nevada,)
)
 Defendants.)
)

Case No. 2:14-cv-00092-RFB-CWH

**ORDER GRANTING JOINT
STIPULATION TO CONTINUE THE
HEARING DATE FOR CROSS-MOTIONS
FOR SUMMARY JUDGMENT AND
PLAINTIFF’S MOTION TO AMEND**

Pursuant to joint stipulation, IT IS HEREBY ORDERED that the hearing date on the parties’ Cross-Motions for Summary Judgment and Plaintiff’s Motion to Amend Complaint be continued from August 27, 2015 to October 1, 2015 at 10:00 AM in LV Courtroom 7C.

DATED: August 20th, 2015.



HON. RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE