

1 Amy Rose
 Nevada Bar 12081
 2 Lauren Kaufman
 Nevada Bar 14677C
 3 AMERICAN CIVIL LIBERTIES UNION OF NEVADA
 4 601 South Rancho Dr. Suite B-11
 Las Vegas, NV 89106
 Telephone 702-366-1536
 5 Fax 702-366-1331

6 Alexandra Chrysanthis
 Nevada Bar 3231
 PRUDHOMME LAW OFFICES
 8 633 South 4th Street Suite 7
 Las Vegas, NV 89101
 alexandra@prudhommelawoffice.com
 Telephone 702-413-6100
 10 Fax 702-413-6664

11 Attorneys for Petitioner

UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA

12 MOHAMMAD AL FALAHI,

Case No.: 2:16-cv-02921

14 Petitioner,

**STIPULATION TO WITHDRAW AMY
 ROSE AS ATTORNEY OF RECORD**

16 vs.

17 UNITED STATES CITIZENSHIP AND

18 IMMIGRATION SERVICE, an entity,

19 Respondent.

20
 21 Petitioner’s counsel, Amy Rose’s continued representation of Mohammad Al Falahi is
 22 no longer tenable as her permanent relocation to California has necessitated that she leave her
 23 position at the American Civil Liberties Union of Nevada.

24 Amy Rose has good cause to withdraw as counsel under the Nevada Rules of
 25 Professional Conduct 1.16(b), which provides that a lawyer may withdraw from representation
 26 where:
 27

28 (1) Withdrawal can be accomplished without material adverse effect on the

1 interests of the client;

2 ...

3 (7) Other good cause exists

4
5 The withdrawal of Amy Rose from this case can be accomplished without adverse effect
6 on the interests of the client because Amy Rose's withdrawal will not delay proceedings in this
7 matter. The Petitioner, Mohammad Al Falahi and the current staff attorney at the ACLU of
8 Nevada, Lauren Kaufman, have agreed to all current timelines pending in this action

9
10 On May 15, 2019, Joseph Carilli, Jr., opposing counsel, stated that he did not oppose the
11 withdrawal of Amy Rose in the current matter.

12
13 It is hereby stipulated and agreed that Amy Rose is no longer affiliated with the American
14 Civil Liberties Union of Nevada, and as such, hereby withdraws her appearance in the above-
15 captioned matter, and requests that: (1) her name be removed from any applicable service lists
16 herein; and (2) that the Clerk terminate the delivery of all notices addressed to rose@aclunv.org
17 in the above captioned case.

18
19 All other current attorneys of the record shall continue to receive all applicable notices.

20
21 Dated this 16th day of May, 2019

Dated this 16th, day of May, 2019

22
23 /s/ Amy Rose
24 Amy Rose
25 Counsel for the Petitioner

/s/ Lauren Kaufman
Lauren Kaufman
Counsel for the Petitioner

26
27 Dated this 15th, day of May, 2019

Dated this 15th, day of May, 2019

28
/s/ Mohammad Al Falahi
Mohammad Al Falahi
Petitioner

/s/ Joseph Carilli
Joseph Carilli, Jr.
Counsel for the Respondent

IT IS SO ORDERED.

Stipulation

UNITED STATES MAGISTRATE JUDGE
DATED: 5-17-2019

1 **CERTIFICATE OF SERVICE**

2

3 I hereby certify that on the 16th, day of May 2019, I caused to be served a true and

4 correct copy of the Stipulation to Withdraw as Amy Rose as Attorney of Record to be served to

5 all the parties listed below by U.S. mail postage pre-paid and through the Courts CM/ECF

6 electronic filing system.

7

8 JOSEPH F. CARILLI, JR.
9 N.H. Bar Identification No. 15311
10 Trial Attorney
11 United States Department of Justice
12 Civil Division
13 Office of Immigration Litigation
14 District Court Section
15 P.O. Box 868, Ben Franklin Station
16 Washington, D.C. 20044
17 Telephone: (202) 616-4848
18 E-mail: joseph.f.carilli2@usdoj.gov

19

20

21

22

23

24

25

26

27

28

29 /s/ Tamika Shauntee

30 An employee of the ACLU of Nevada