

Alexander R. Vail, Esq.
 Nevada Bar # 14291
 Law Office of Alexander R. Vail, L.L.C.
 2850 West Horizon Ridge Parkway, Suite 200
 Henderson, Nevada 89052
 Phone: 702-370-5049
 Email: alexander@vailimmigrationservices.com
Attorney for Petitioner

**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

Yali SONG,

Petitioner,

vs.

Jeanne M. KENT, Director, Las Vegas Field
 Office of United States Citizenship and
 Immigration Services, in her official
 capacity; and UNITED STATES
 CITIZENSHIP AND IMMIGRATION
 SERVICES,

Respondents.

No. 2:18-cv-00919-GMN-VCF

**JOINT STIPULATION ON
 DISCOVERY / BRIEFING
 SCHEDULE**

Petitioner seeks review of an administrative decision. The parties agree that the issues and claims remaining in this action may be adjudicated by the Court through cross-motions for summary judgment and the submission of the federal agency’s Administrative Record regarding the agency action being challenged by Petitioner. Accordingly, pursuant to Local Rule 16-1(c)(1), which provides that actions for review on an administrative record shall be governed by entry of a briefing schedule, the parties stipulate as follows:

I. Rule 26(f) Discovery Issues

The parties have conferred regarding the need, if any, for discovery beyond the Administrative Record but believe that all evidence needed to resolve this issue is contained in

1 the Administrative Record maintained by the U.S. Citizenship and Immigration Services
2 (“USCIS”). Therefore, the parties do not believe discovery needs to be conducted in this case

3 Respondents will provide Petitioner’s counsel a copy of the Certified Administrative
4 Record maintained by USCIS by May 15, 2019. Respondents will also file the Certified
5 Administrative Record with the Court by May 15, 2019. To the extent possible, Respondents will
6 also provide a copy of the Certified Administrative Record in electronic format to both the Court
7 and Petitioner. Given the nature of much of the information contained in the Certified
8 Administrative Record, and notwithstanding the access-limitations contained in Fed. R. Civ. P.
9 5.2(c), the parties stipulate that the Certified Administrative Record that is filed with the Court
10 will be unredacted and submitted under seal pursuant to Fed. R. Civ. P. 5.2(f).

11 **II. Briefing Schedule**

12 Pursuant to Local Rule 16-1(c)(1), the parties agree to the following briefing schedule:

- 13 June 15, 2019: Petitioner will file her Motion for Summary Judgment.
14 July 6, 2019: Respondents will file any response to Petitioner’s Motion for Summary
15 Judgment in addition to its own Cross-Motion for Summary Judgment.
16 July 20, 2019: Petitioner will file any response to Respondents’ Cross-Motion for
17 Summary Judgment and/or reply to Respondent’s Response to
18 Petitioner’s Motion for Summary Judgment.
19 August 3, 2019: Respondents will file any reply to Petitioner’s Response to Respondents’
20 Cross-Motion for Summary Judgment.

21 Respectfully submitted this 22nd day of April, 2019.

22 LAW OFFICE OF ALEXANDER R. VAIL, LLC

23 NICHOLAS A. TRUTANICH
24 United States Attorney

25 /s/ Alexander R. Vail
26 ALEXANDER VAIL, Esq.
27 2850 West Horizon Ridge Parkway, Ste 200
28 Henderson, Nevada 89052
Attorney for Petitioner

25 /s/ Mark Woolf
26 MARK WOOLF
27 Assistant United States Attorney
28 *Attorneys for Respondents*

IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: 4-23-2019