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

10  
11 Ramiro J. Cuadra,

12 Plaintiff,

13 v.

14 Alejandro Mayorkas, in his official capacity  
as acting Secretary of Homeland Security;  
15 U.S. Department of Homeland Security;  
Tracy Renaud, in her official capacity as  
16 acting Director of U.S. Citizenship and  
Immigration Services; U.S. Citizenship and  
17 Immigration Services; the United States of  
America; and John Does I through XX,  
18 inclusive,

19 Defendants.  
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Case No. 2:21-cv-00470-APG-VCF

**Joint Status Report and Request to  
Continue the Stay of the Proceedings an  
Additional 60 Days**

21 The parties, by and through their respective counsel, hereby stipulate and jointly  
22 move the Court to continue to stay all deadlines an additional 60 days in this matter based  
23 on the following:

24 1. On March 23, 2021, Plaintiff filed his Complaint for Relief in the Nature of  
25 Mandamus (ECF No. 1), requesting, among other things, that the Court issue a Writ of  
26 Mandamus compelling the United States Citizenship and Immigration Services ("USCIS")  
27 to adjudicate Plaintiff's I-485 application.  
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2. The deadline for the Federal Defendants to answer or otherwise plead was June 23, 2021 (ECF No. 6).

3. On June 8, 2021, the parties stipulated to stay this case's proceedings (ECF No. 7). As part of the stipulation, the parties agreed to provide the Court with a joint status report 90 days after the entry of the Court's stay order (ECF No. 7 at 2).

4. On June 9, 2021, the Court granted the parties' stipulation (ECF NO. 8).

5. In accordance with the parties' stipulation and the Court's Order, the parties file this Joint Status Report and Stipulation to request an additional 60 days.

6. Due to Plaintiff's relocation from Las Vegas to Reno, the actions of the agency have been delayed longer than originally anticipated.

7. Notwithstanding the unexpected delay, USCIS continues to plan on setting an interview date and time for the adjudication of Plaintiff's I-485 application.

8. The USCIS's interview may resolve some or all of the issues raised in the complaint.

9. Accordingly, the parties request that the Court continue to stay this matter pending resolution or final adjudication of the Plaintiff's I-485 application. If the parties are able to resolve this matter, they will promptly file a stipulation of dismissal.

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9. If the parties are unable to resolve this matter and the case is not dismissed, the parties agree to file another joint status report 60 days after the entry of the Court's order on this stipulation.

Respectfully submitted this 7th day of September 2021.

REZA ATHARI & ASSOCIATES

/s/ Luther Snavely

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CHRISTOPHER CHIOU

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/s/ Skyler H. Pearson

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**IT IS SO ORDERED:**



**UNITED STATES DISTRICT JUDGE**

**DATED:** September 7, 2021