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13 **UNITED STATES DISTRICT COURT**
14 **DISTRICT OF NEVADA**

15 Ramiro J. Cuadra,

16 Plaintiff,

17 v.

18 Alejandro Mayorkas, in his official capacity
19 as acting Secretary of Homeland Security;
20 U.S. Department of Homeland Security;
21 Tracy Renaud, in her official capacity as
22 acting Director of U.S. Citizenship and
23 Immigration Services; U.S. Citizenship and
24 Immigration Services; the United States of
25 America; and John Does I through XX,
26 inclusive,

27 Defendants.

28 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.

1 2. The deadline for the Federal Defendants to answer or otherwise plead was
2 June 23, 2021 (ECF No. 6).

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

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

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

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

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

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

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

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

4 Respectfully submitted this 7th day of September 2021.

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7 REZA ATHARI & ASSOCIATES

8
9 /s/ Luther Snavely
10 LUTHER SNAVELY
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13 CHRISTOPHER CHIOU
Acting United States Attorney

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15 /s/ Skyler H. Pearson
SKYLER H. PEARSON
Assistant United States Attorney
Attorneys for the United States

16 IT IS SO ORDERED:


17
18 UNITED STATES DISTRICT JUDGE

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20 DATED: September 7, 2021