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2 District of Nevada  
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8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 Pouyan Pazargadi,

11 Plaintiff,

12 v.

13 Ted H. Kim, in his official capacity as  
Associate Director of the Refugee, Asylum  
14 and International Operations Directorate of  
United States Citizenship and Immigration  
15 Services; United States Citizenship and  
Immigration Services,

16 Defendants.

Case No. 2:22-cv-01764-JCM-VCF

**Stipulation and Order to Stay Case**

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18 IT IS HEREBY STIPULATED and AGREED by and between Plaintiff Pouyan  
19 Pazargadi ("Plaintiff") and Defendants, through their respective counsel, subject to the  
20 approval of the Court, that the instant action shall be stayed pending adjudication of  
21 Plaintiff's I-589 Application for Asylum and Withholding of Removal, based on the  
22 following terms:

- 23 1. United States Citizenship and Immigration Services ("USCIS") agrees to  
24 interview Plaintiff on April 11, 2023 at 7:15 a.m.;

2. Defendants agree to diligently work towards completing adjudication within 120 days of Plaintiff's interview date, absent unforeseen or exceptional circumstances that would require additional time to complete adjudication;
3. In the event that adjudication is not completed within 120 days of the interview date, Defendants will provide a status report to the Court;
4. Plaintiff agrees to submit all supplemental documents and evidence, if any, to USCIS seven (7) to ten (10) days prior to the agreed upon scheduled interview. Plaintiff recognizes that failure to submit these documents seven (7) to ten (10) days prior to the interview may result in the interview being rescheduled at no fault of USCIS;
5. Upon receipt of the Los Angeles Asylum Office's decision, Plaintiff agrees to voluntarily dismiss the case; and
6. Each party agrees to bear his, her or its own litigation costs and attorney fees.

The proposed stay is requested in the interests of judicial economy. A stay would avoid the unnecessary and burdensome expenditure of the parties' and this Court's resources that would be required to adjudicate the jurisdictional and merits issues presented in this action. Moreover, there is no prejudice to either party if the stay is granted. There are no pending deadlines (other than Defendants' initial response to the complaint)<sup>1</sup> and therefore, a stay would not affect any current proceedings in this Court.

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<sup>1</sup> The summons and complaint were properly served on October 20, 2022, and Defendants' response thereto is currently due on December 19, 2022.

1 Accordingly, the parties respectfully request a stay of the instant action until  
2 August 23, 2023.

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4 Dated: November 15, 2022.


5 JASON M. FRIERSON  
6 United States Attorney

7 /s/ Stephen R. Hanson II  
8 Stephen R. Hanson II  
9 Assistant United States Attorney

LAW OFFICE OF  
ALEXANDER R. VAIL, L.L.C.

10 /s/ Alexander R. Vail  
11 Alexander R. Vail  
12 Attorney for Plaintiff

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14 IT IS SO ORDERED:

15   
16 UNITED STATES DISTRICT JUDGE

17  
18 DATED: November 21, 2022  
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