

1 SUE FAHAMI
Acting United States Attorney
2 District of Nevada
Nevada Bar No. 5634
3 CHRISTIAN R. RUIZ
Assistant United States Attorney
4 501 Las Vegas Blvd. So., Suite 1100
Las Vegas, Nevada 89101
5 Phone: (702) 388-6336
Fax: (702) 388-6787
6 Christian.Ruiz@usdoj.gov

7 *Attorneys for the Federal Defendants*

8
9 **UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

10 Alberto Mpiana Da Mesquita E Melo,

11 Plaintiff,

12 v.

13 U.S. Citizenship and Immigration Services
(USCIS), et al.,

14 Defendant.
15

Case No. 2:24-cv-01030-JAD-EJY

**Joint Stipulation and Order to
Stay the Proceedings (Fifth
Request)**

ECF No. 25

16 Plaintiff and Defendants, through their undersigned counsel, hereby stipulate and
17 jointly request that the Court stay all deadlines in this matter and hold this case in abeyance
18 for an additional period of 30 days, or until **April 6, 2025**.

19 The subject of this litigation concerns Plaintiff's I-485 application for adjustment of
20 status and I-601 application for waiver of grounds of inadmissibility. Plaintiff asserts
21 Defendants have unduly delayed the processing of his I-485 and I-601 applications.

22 The parties have conferred and may resolve this matter without continued litigation.
23 Since the last stay was granted, Defendants reopened Plaintiff's administrative applications
24 and granted his I-601 application. Plaintiff's I-485 application remains pending.

25 Plaintiff, through his counsel, is in the process of preparing a parole request for
26 submission to a third-party agency, the outcome of which may determine the outcome of
27 his I-485 application. Defendants have also requested briefing from Plaintiff to address
28 certain issues in his pending I-485 application. The parties thus request an extension of the

1 stay in the district court proceedings to allow the parties an opportunity to pursue Plaintiff's
2 parole request and conclude the administrative process. Pending the conclusion of the
3 remaining administrative processing of Plaintiff's I-485 application and parole request, this
4 litigation may become moot.

5 This is the fifth request to stay the proceedings. This request is not sought for
6 purposes of delay or any other improper purpose, but to facilitate the parties' efforts to
7 resolve the matter in a "just, speedy, and inexpensive" manner consistent with Fed. R. Civ.
8 P. 1. The parties reserve the ability to seek additional time to finalize resolution, if
9 necessary.

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1 Respectfully submitted this 10th day of March 2025.

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3 SULL & ASSOCIATES, PLLC.

4 /s/ Hardeep Sull

5 HARDEEP SULL

6 3753 Howard Hughes Parkway,

7 Suite 200

8 Las Vegas, Nevada 89169

9 (702) 953-9500

10 dee@sullglobal.com

SUE FAHAMI

Acting United States Attorney

/s/ Christian R. Ruiz

CHRISTIAN R. RUIZ

Assistant United States Attorney

Attorneys for the Federal Defendants

11
12 THE BROOKS LAW FIRM, APC

13 /s/ Carlo Brooks

14 CARLO BROOKS

15 *Pro hac vice*

16 3826 Grand View Blvd.,

17 Suite 661472

18 Los Angeles, CA 90066

19 (310) 691-9373

20 carlo@carlobrooks.com

21 *Attorneys for Plaintiff*

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23 **ORDER**

24 Based on the parties' stipulation [ECF No. 25] and good cause appearing, IT IS
25 ORDERED that THE STAY IS EXTENDED to April 6, 2025.

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27 
28 U.S. District Judge Jennifer A. Dorsey

Dated: March 10, 2025