

The Honorable Lauren King

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IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

ABDIQAFAR WAGAFE, *et al.*, on behalf of  
himself and other similarly situated,

Plaintiffs,

v.

JOSEPH R. BIDEN, President of the United  
States, *et al.*,

Defendants.

CASE NO. C17-00094-LK

**STIPULATION FOR ORDER  
STAYING ADJUDICATION OF  
ADJUSTMENT CLASS CLAIMS;  
ORDER THEREON**

WHEREAS in this action two classes of litigants, the “Adjustment Class” and the  
“Naturalization Class,” assert a variety of challenges to USCIS’ “Controlled Application Review and  
Resolution Program” (CARRP); and

WHEREAS the claims of the two classes are largely identical; and

WHEREAS the Defendants contend the Adjustment Class claims face certain jurisdictional  
issues that do not affect the Naturalization Class claims; and

WHEREAS the parties have met and conferred and mutually agree that it will promote  
efficiency and conservation of judicial resources to stay the litigation as to the Adjustment Class  
claims in favor of proceeding first to an adjudication of the Naturalization Class claims; and

1 WHEREAS the parties believe that resolving the Naturalization Class claims may pave the  
2 way for a resolution of the Adjustment Class claims and thereby avoid the need for the Court to  
3 confront a jurisdictional question potentially unnecessary to the resolution of this lawsuit;

4 NOW THEREFORE the parties through their respective counsel of record do hereby  
5 stipulate and agree that the Court may make and enter the following order:

6 1. The order setting a deadline for Defendants to file their motion concerning the  
7 application of *Patel v. Garland* to Plaintiffs' claims (Dkt. # 608) is vacated.

8 2. The claims of the Adjustment Class are stayed until further order of the Court.

9 3. The stay of the Adjustment Class claims may be terminated by the Court upon the  
10 request by either Plaintiffs or Defendants.

11 4. The parties shall jointly notify the Court, within 90 days of the date of this Order, and

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1 every 90 days thereafter, whether they wish the stay of the Adjustment Class claims to continue.

2 5. Defendants shall notify the Court within 15 days of issuance that USCIS has issued  
3 its new policy to replace CARRP.

4 **SO STIPULATED.**

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6 DATED: October 24, 2022.

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1 **SO STIPULATED.**

2 DATED: October 24, 2022.

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**ORDER**

IT IS SO ORDERED.

DATED: October 28, 2022.

  
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Lauren King  
United States District Judge