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**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

UNITED STATES OF AMERICA, )  
 )  
Plaintiff, )  
 )  
v. )  
 )  
VICTOR HUGO GUTAMA, )  
a/k/a Hugo Gutama, )  
 )  
Defendant. )

No.: 2:18-cv-00175-RSL

**STIPULATED MOTION TO STAY CASE**

**NOTE ON MOTION CALENDAR: 4/6/2018**

The United States of America (“United States” or “Plaintiff”) and Victor Hugo Gutama, also known as Hugo Gutama (“Defendant”), (together, the “Parties”) stipulate and jointly move, pursuant to W.D. Wash. LCR 10(g), for entry of an order staying all proceedings and deadlines in this matter, including Defendant’s answer deadline and all initial scheduling dates, for 90 days until approximately July 5, 2018. In support of their request, the Parties state the following:

1. On February 5, 2018, Plaintiff filed a Complaint to Revoke Naturalization under 8 U.S.C. § 1451(a), seeking, *inter alia*, judgment revoking and setting aside Defendant’s naturalization and cancelling his certificate of naturalization. Dkt. # 1.

- 1           2. The complaint was served on Defendant, via his attorney of record, on February 27,  
2           2018. Dkt. # 8. Pursuant to 8 U.S.C. § 1451(b), Defendant's deadline to answer or  
3           otherwise respond to the complaint is April 30, 2018.
- 4           3. On March 20, 2018, the Court entered an Order Regarding Initial Disclosures, Joint  
5           Status Report, and Early Settlement. Dkt. # 9. Pursuant to the order, the deadline for  
6           the Parties' Rule 26(f) conference was April 3, 2018; the deadline for Rule 26(a)(1)  
7           initial disclosures is April 10, 2018; and the deadline for the combined joint status  
8           report and discovery plan is April 17, 2018. *Id.* at p. 1.
- 9           4. The Parties have been engaged in discussions concerning whether this case may be  
10          resolved without further litigation. Yet, additional time is needed to complete those  
11          discussions. Accordingly, the Parties request that all deadlines be stayed in this case  
12          for 90 days while they continue their discussions and, if necessary, seek the  
13          appropriate approval for any agreement, if reached.
- 14          5. A stay in this matter would therefore serve the interests of the Parties, as well as the  
15          Court, by preserving resources until it is determined that the claims in this case can  
16          only be resolved through litigation. Moreover, the requested stay is not sought for  
17          purposes of delay or intended to prejudice any party.
- 18          6. At the conclusion of the 90-day stay period, the Parties propose to file a status report  
19          on July 5, 2018, updating the Court of any developments and/or setting forth a  
20          proposal to govern further proceedings.

21           WHEREFORE, the Parties respectfully request that the Court grant their stipulated  
22          motion and stay all proceedings and deadlines in this matter, including Defendant's answer  
23          deadline and all initial scheduling dates, for 90 days until approximately July 5, 2018.

1 Dated: April 6, 2018

2 Respectfully submitted,

3 /s/ Jay Gairson (by TMP w/ permission)

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**Attorneys for the United States**

**DATED: April 9, 2018**

IT IS SO ORDERED.



Hon. Robert S. Lasnik

UNITED STATES DISTRICT JUDGE