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6 UNITED STATES DISTRICT COURT
7 WESTERN DISTRICT OF WASHINGTON
8 AT SEATTLE

9 TENAYE ALEMU,

10 Plaintiff,

11 v.

12 UNITED STATES CITIZENSHIP AND
13 IMMIGRATION SERVICES, *et al.*,

14 Defendants.

No. 2:24-cv-00091-JHC

STIPULATED MOTION TO HOLD CASE IN
ABEYANCE AND ORDER

15
16 Plaintiff brought this litigation pursuant to the Administrative Procedure Act and
17 Mandamus Act seeking, *inter alia*, to compel U.S. Citizenship and Immigration Services
18 (“USCIS”) to adjudicate her Form I-589, Application for Asylum and for Withholding of Removal.
19 Defendants’ response to the Complaint is currently due on April 1, 2024. The parties are currently
20 working towards a resolution to this litigation. For good cause, the parties request that the Court
21 hold the case in abeyance until Thursday, September 19, 2024.

22 Courts have “broad discretion” to stay proceedings. *Clinton v. Jones*, 520 U.S. 681, 706
23 (1997). “[T]he power to stay proceedings is incidental to the power inherent in every court to
24 control the disposition of the causes on its docket with economy of time and effort for itself, for
25 counsel, and for litigants.” *Landis v. N. Am. Co.*, 299 U.S. 248, 254 (1936); *see also* Fed. R. Civ.
26 P. 1.

With additional time, this case may be resolved without the need of further judicial

1 intervention. USCIS has scheduled Plaintiff Tenaye Alemu’s asylum interview for May 22, 2024.
2 USCIS agrees to work diligently towards completing the adjudication within 120 days of the
3 interview, absent unforeseen or exceptional circumstances that would require additional time for
4 adjudication. If the adjudication is not completed within that time, USCIS will provide a status
5 report to the Court.

6 Plaintiff will submit all supplemental documents and evidence, if any, to USCIS seven to
7 ten days prior to the interview date. Plaintiff recognizes that failure to submit documents prior to
8 the interview may require the interview to be rescheduled and the adjudication delayed. If needed,
9 Plaintiff will bring an interpreter to the interview; otherwise, the interview will need to be
10 rescheduled and the adjudication delayed. After the interview, USCIS will need time to adjudicate
11 Plaintiff’s asylum application. Once the application is adjudicated, Plaintiff will dismiss the case
12 with each party to bear their own litigation costs and attorneys’ fees. Accordingly, the parties
13 request this abeyance to allow USCIS to conduct Plaintiff’s asylum interview and then process her
14 asylum application.

15 As additional time is necessary for this to occur, the parties request that the Court hold the
16 case in abeyance until September 19, 2024. The parties will submit a joint status report on or before
17 September 19, 2024, if the case is still unresolved.

1 Dated: March 25, 2024

Respectfully submitted,

2 BRIAN M. BOYNTON
Principal Deputy Assistant Attorney General
3 Civil Division

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Attorneys for Plaintiffs

15 *Attorneys for Defendants*

16 ***I certify that this memorandum contains***
17 ***383 words, in compliance with the Local***
Civil Rules.

1 **ORDER**

2 The case is held in abeyance until September 19, 2024. The parties shall submit a joint
3 status report on or before September 19, 2024, if the case is still unresolved. It is so ORDERED.

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5 DATED this 26th day of March, 2024.

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9 JOHN H. CHUN
10 United States District Judge