

The Honorable James L. Robart
United States District Judge

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

Wilman Gonzalez ROSARIO, *et al.*,

Plaintiffs,

v.

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

Defendants.

Case No. 2:15-cv-00813-JLR

JOINT STATEMENT AND STIPULATED
PROPOSED ORDER

Noted for September 14, 2018

The parties have again met and conferred regarding a plan for implementation of this Court's order. The parties have agreed on a partial implementation plan, attached as Exhibit A. The parties have not been able to come to final agreement on two points: (1) whether the Court should specify specific rates of compliance for employment authorization document (EAD) adjudication as part of an implementation order and what those rates should be; (2) the appropriate venue for filing any Federal District Court action where an EAD application is not adjudicated in compliance with this Court's order, after the individual has complied with the steps set forth in the implementation plan. The parties respectfully request that this Court permit them to simultaneously file short letter-briefs of no more than three pages addressing these two issues, and that the Court resolve this lingering dispute in accordance with the accompanying proposed order.

Plaintiffs state that they separately will move for attorneys' fees and costs under the Equal Access to Justice Act. Defendants state that the time to notice an appeal of the district

1 court's decision has not yet run, and that Plaintiffs cannot demonstrate the need for interim
2 attorneys' fees pending any appeal.

3 Respectfully submitted this 14th day of September, 2018.
4

5 /s/ Christopher Strawn

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Joint Statement
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Plaintiffs,

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UNITED STATES CITIZENSHIP AND
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Defendants.

Case No. 2:15-cv-00813-JLR

STIPULATED [PROPOSED] ORDER

Noted for September 14, 2018

[Proposed] ORDER

The parties having so stipulated and agreed, it is hereby SO ORDERED.

The parties are directed to file three-page letter briefs on their positions regarding: (1) whether the Court should specify specific rates of compliance for employment authorization document (EAD) adjudication as part of an implementation order and what those rates should be; (2) the appropriate venue for filing any Federal District Court action where an EAD application is not adjudicated in compliance with this Court’s order, after the individual has complied with the steps set forth in the implementation plan. The letter briefs of the parties are due within 7 days after the date of this order. The Court will resolve the dispute regarding the implementation plan and, as appropriate, the implementation plan.

Dated this _____ day of _____, 2018.

The Honorable James L. Robart
United States District Judge

Submitted by:

/s/ Christopher Strawn

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on September 14, 2018, I electronically filed the foregoing with the Clerk of the Court using CM/ECF. I also certify that the foregoing document should automatically be served this day on all counsel of record *via* transmission of Notices of Electronic Filing generated by CM/ECF.

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