	Case 2:15-cv-00813-JLR Docum	ient 134	Filed 09/14/18	Page 1 of 7
1				rable James L. Robart d States District Judge
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7	UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON			
8	AT SI	EATTLE		
9	Wilman Gonzalez ROSARIO, et al.,	Case N	No. 2:15-cv-00813	3-JLR
10	Plaintiffs,			
11			T STATEMENT A OSED ORDER	AND STIPULATED
12				
13	UNITED STATES CITIZENSHIP AND IMMIGRATION SERVICES, et al.,	Noted	for September 14	-, 2018
14 15	Defendants.			
16	The parties have again met and conferre	ed regardi	ing a plan for imp	lementation of this
17	Court's order. The parties have agreed on a partial implementation plan, attached as Exhibit A.			ttached as Exhibit A.
18	The parties have not been able to come to final agreement on two points: (1) whether the Court			
19	should specify specific rates of compliance for employment authorization document (EAD)			
20	adjudication as part of an implementation order and what those rates should be; (2) the			ld be; (2) the
21	appropriate venue for filing any Federal District Court action where an EAD application is not			AD application is not
22	adjudicated in compliance with this Court's or	der, after i	the individual has	complied with the
23	steps set forth in the implementation plan. The parties respectfully request that this Court			
24	permit them to simultaneously file short letter-	briefs of r	no more than three	e pages addressing
25	these two issues, and that the Court resolve this	s lingering	g dispute in accord	dance with the
26	accompanying proposed order.			
27		C		

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 Northwest Immigrant Rights Project Joint Statement 615 2nd Ave., Suite 400 Case No. 2:15-cv-00813-JLR Seattle, WA 98104

(206) 957-8628

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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 Christopher Strawn, WSBA No. 32243
6	Northwest Immigrant Rights Project
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15	(415) 981-3000
10	Trina Realmuto (pro hac vice)
18	American Immigration Council 100 Summer Street, 23rd Floor
19	Boston, MA 02110 (857) 305-3600
20	
21	Attorneys for Plaintiffs and Class Members
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25	Scott D. Pollock (pro hac vice)
26	Christina J. Murdoch (pro hac vice) Kathryn R. Weber (pro hac vice)
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3	Robert Pauw, WSBA 13613 Gibbs Houston Pauw			
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5	Seattle, WA 98104-1003 (206) 682-1080			
6	Attorneys for Plaintiffs			
7				
8	Chad A. Readler			
9	Acting Assistant Attorney General			
10	William C. Peachey Director			
11				
12	/s/ Jeffrey S. Robins Jeffrey S. Robins			
13	Assistant Director U.S. Department of Justice			
14	Civil Division			
15	Office of Immigration Litigation District Court Section			
16	P.O. Box 868, Ben Franklin Station Washington, DC 20044			
17	Phone: (202) 616-1246			
18	Fax: (202) 305-7000 Email: jeffrey.robins@usdoj.gov			
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20	Attorneys for Defendants			
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1				rable James L. Robart l States District Judge	
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7					
8	UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON				
9		EATTLE	ASHINGTON		
10	Wilmon Conzoloz POS A DIO ot al	Case N	o. 2:15-cv-00813		
11	Wilman Gonzalez ROSARIO, <i>et al.</i> ,	Cuse IV	0. 2.15 CV 00015		
12	Plaintiffs,	STIPU	LATED [PROPC	SED] ORDER	
13	v.				
14	UNITED STATES CITIZENSHIP AND IMMIGRATION SERVICES, <i>et al.</i> ,	Noted 1	for September 14	, 2018	
15 16	Defendants.				
17	[Proposed] ORDER				
18	The parties having so stipulated and agreed, it is hereby SO ORDERED.				
19	The parties are directed to file three-page letter briefs on their positions regarding: (1)				
20	whether the Court should specify specific rates of compliance for employment authorization				
21	document (EAD) adjudication as part of an implementation order and what those rates should be;			;	
22	(2) the appropriate venue for filing any Federal District Court action where an EAD application				
23	is not adjudicated in compliance with this Court's order, after the individual has complied with				
24	the steps set forth in the implementation plan. The letter briefs of the parties are due within 7				
25	days after the date of this order. The Court will	resolve th	e dispute regardi	ng the implementation	
26	plan and, as appropriate, the implementation pl	an.			
27	Dated this day of, 2	2018.			
28					
	Joint Statement Case No. 2:15-cv-00813-JLR			t Immigrant Rights Project 15 2 nd Ave., Suite 400	

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orthwest Immigrant Rights Projec 615 2nd Ave., Suite 400 Seattle, WA 98104 (206) 957-8628

1		
2		The Honorable James L. Robart United States District Judge
3	Submitted by:	
4	Submitted by:	
5	/s/ Christopher Strawn	
6	Christopher Strawn, WSBA No. 32243	
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11 12	/s/ Jeffrey S. Robins Jeffrey S. Robins			
12	Assistant Director U.S. Department of Justice			
14	Civil Division Office of Immigration Litigation			
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		6		Seattle, WA 98104 (206) 957-8628

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1	CERTIFICATE OF SERVICE
2	I HEREBY CERTIFY that on September 14, 2018, I electronically filed the foregoing with the
3	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 <i>via</i> transmission of Notices of
4	Electronic Filing generated by CM/ECF.
5	
6 7	<u>/s/ Christopher Strawn</u> Christopher Strawn, WSBA No. 32243
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