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 11 **UNITED STATES DISTRICT COURT**  
**FOR THE NORTHERN DISTRICT OF CALIFORNIA**  
 12 **OAKLAND DIVISION**

13  
 14 IMMIGRANT LEGAL RESOURCE  
 CENTER, *et al.*,

15  
16 Plaintiffs,

17 v.

18  
 19 ALEJANDRO N. MAYORKAS, *et al.*,

20 Defendants.  
21  
22

Case No. 4:20-cv-5883-JSW

**DECLARATION OF**  
**JULIE STRAUS HARRIS**

1 I, Julie Straus Harris, declare as follows:

- 2 1. On August 20, 2020, Plaintiffs filed a Complaint for Declaratory and Injunctive Relief, *see* ECF  
3 No. 1. On October 14, 2020, Plaintiffs served their Complaint on the United States Attorney for  
4 the Northern District of California. *See* ECF No. 101. Pursuant to this Court's orders, all original  
5 deadlines in this case have been continued for a total of 90 days.
- 6 2. On September 29, 2020, the Court entered an order staying, pursuant to 5 U.S.C. § 705,  
7 implementation and the effective date of USCIS Immigration Fee Schedule and Changes to  
8 Certain Other Immigration Benefit Request Requirements, 85 Fed. Reg. 46,788 (Aug. 3, 2020) (the  
9 "Final Rule") in its entirety, and enjoining, on a nationwide basis, Defendants from implementing  
10 or enforcing the Final Rule or any portion thereof pending final adjudication of this matter. ECF  
11 No. 98 ("Preliminary Injunction Order").
- 12 3. On February 2, 2021, the President signed Executive Order 14,012, "Restoring Faith in Our Legal  
13 Immigration Systems and Strengthening Integration and Inclusion Efforts for New Americans,"  
14 86 Fed. Reg. 8,277 (Feb. 5, 2021) (the "EO"), attached hereto as Exhibit. The Final Rule at issue  
15 in this litigation is named in the EO at Section 3(a)(ii), which states that certain government  
16 officials, including the Secretary of Homeland Security shall "recommend steps, as appropriate  
17 and consistent with applicable law, to revise or rescind those agency actions." Section 3(b) further  
18 states that the same government officials "[w]ithin 90 days of the date of this order . . . shall each  
19 submit a plan to the President describing the steps their respective agencies will take to advance  
20 the policy set forth in section 1 of this order." Finally, Section 3(c) states that the same  
21 government officials "[w]ithin 180 days of submitting the plan described in subsection (b) of this  
22 section . . . shall each submit a report to the President describing the progress of their respective  
23 agencies towards implementing the plan developed pursuant to subsection (b) of this section and  
24 recognizing any areas of concern or barriers to implementing the plan." Additionally, Section 5(a)  
25 of the EO states that the same government officials shall "within 60 days of the date of this order,  
26 develop a plan describing any agency actions, in furtherance of the policy set forth in section 1 of  
27 this order, that they will take to: . . . (iii) make the naturalization process more accessible to all  
28 eligible individuals, including through a potential reduction of the naturalization fee and

1 restoration of the fee waiver process.” Section 5(b) of the EO further states that the same  
2 government officials “[w]ithin 180 days of the issuance of the plan developed pursuant to  
3 subsection (a) of this section . . . shall submit a report to the President describing the progress in  
4 implementing the plan, any barriers to implementing the plan, and any additional areas of concern  
5 that should be addressed to ensure that eligible individuals are able to apply for naturalization in a  
6 fair and efficient manner.”

7 4. In light of the Preliminary Injunction Order and the EO, and in the interests of judicial economy,  
8 the parties have conferred and agreed to jointly request that the Court stay this case and hold all  
9 proceedings in abeyance to allow defendant the Secretary of Homeland Security to undertake the  
10 review contemplated by the EO.

11 5. Additionally, the parties have conferred and agreed to jointly request that, should the case be stayed  
12 to allow defendant the Secretary of Homeland Security to undertake the review contemplated by  
13 the EO, the parties be permitted to file a joint status report on or before May 13, 2021, indicating  
14 whether this case and all proceedings should continue to be held in abeyance or proposing a  
15 schedule for continuing the litigation.

16 6. I declare under penalty of perjury that the foregoing is true and correct.

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18 Executed in Washington, D.C. on February 9, 2021.

19  
20 /s/ Julie Straus Harris  
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