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9 Attorneys for Defendants

10  
 11 UNITED STATES DISTRICT COURT  
 12 FOR THE CENTRAL DISTRICT OF CALIFORNIA  
 13 WESTERN DIVISION

14 YEA JI SEA,  
 15 Plaintiff,  
 16 v.  
 17 UNITED STATES DEPARTMENT OF  
 HOMELAND SECURITY, et al.,  
 18 Defendants.  
 19

No. CV-18-6267-MWF (ASx)

**DEFENDANTS' RESPONSE TO THE  
 COURT'S AUGUST 15, 2018 ORDER  
 TO SHOW CAUSE**

[Declaration of Rachel Trias filed under separate cover]

Honorable Michael W. Fitzgerald  
 United States District Judge

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1 Defendants' hereby provide their response to the Court's August 15, 2018 Order  
2 denying SPC Sea's Motion for a Preliminary Injunction and Order Defendants to Show  
3 Cause.

4 As represented at the August 14 hearing, SPC Sea had her naturalization interview  
5 on August 15, 2018. Trias Decl., Dkt. 18-1, ¶ 2. Following her interview, SPC Sea's  
6 Form N-400, Naturalization Application, was stamped approved. Id. Also on August 15,  
7 a Form N-445, Notice of Naturalization Oath Ceremony, was issued by USCIS. Id. ¶ 3.  
8 The Form N-445 instructed SPC Sea to appear for her Naturalization Oath Ceremony on  
9 Friday, August 24, 2018. Id. Copies of the N-445 were sent both to SPC Sea and to her  
10 attorney of record in her naturalization proceeding. Id. On August 24, 2018, SPC Sea  
11 took her oath of allegiance and naturalized as a U.S. citizen. Id. ¶ 4.

12 As of August 15, 2018, when USCIS provided SPC Sea with a naturalization  
13 interview and a final determination on her naturalization application, SPC Sea had  
14 received the relief she sought by her Complaint and her Motion for a Preliminary  
15 Injunction. See Compl., Dkt. 1, at 14, no. 2; Memo. Supporting Ex Parte App., Dkt. 4-1,  
16 2:1-4, 18:15-19. As SPC Sea has obtained the relief she sought through this action, her  
17 case is now moot. See Porter v. Jones, 319 F.3d 483, 489 (9th Cir. 2003); see also  
18 Alvarez v. Smith, 558 U.S. 87, 92 (2009). Defendants request that the Court dismiss this  
19 action.

20 Dated: August 27, 2018

Respectfully submitted,

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22 United States Attorney  
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 19

No. CV-18-6267-MWF (ASx)

**DECLARATION OF RACHEL TRIAS  
 IN SUPPORT OF DEFENDANTS'  
 RESPONSE TO THE COURT'S  
 AUGUST 15, 2018 ORDER TO SHOW  
 CAUSE**

Honorable Michael W. Fitzgerald  
 United States District Judge

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DECLARATION OF RACHEL TRIAS

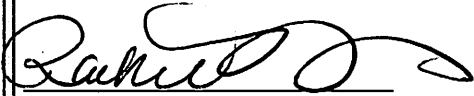
I, RACHEL TRIAS, declare the following:

1. I am employed by the United States Department of Homeland Security (“DHS”), U.S. Citizenship and Immigration Services (“USCIS”), formerly known as the Immigration and Naturalization Service (“INS”). I am employed as a Senior Immigration Services Officer (“ISO III”) at the USCIS Los Angeles County Field Office, within District 23, in the Citizenship Branch of the Adjudications Unit. I have held this position since September 2015. Prior to that, I was employed as an Immigration Services Officer (“ISO II”) from June 2008 to August 2015 for the same field office. I have been employed by the agency in various capacities since June 2008. In my capacity as an ISO III, I have access to the official files and records of DHS. In this capacity, I have reviewed the official files and records maintained by DHS relating to Yea Ji Sea (“Ms. Sea”), administrative file number A206-353-420.
2. A review of Ms. Sea’s file indicates that Ms. Sea had her naturalization interview on August 15, 2018. Following her interview, her naturalization application, Form N-400, was stamped approved on the same day.
3. Also on August 15, 2018, a Form N-445, Notice of Naturalization Oath Ceremony, was issued by USCIS, instructing Ms. Sea to appear for her Naturalization Oath Ceremony on Friday, August 24, 2018 at 8:15 AM, at the U.S District Court Central District, located at 1202 South Figueroa St. in Los Angeles, California. The applicant’s copy of the notice was forwarded to Ms. Sea, and the representative’s copy was forwarded to her attorney of record.

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4. On August 24, 2018, Ms. Sea took her oath of allegiance and naturalized as a U.S. citizen.

I declare under penalty of perjury that the forgoing is true and correct. Executed in Los Angeles, California on August 27, 2018.



Rachel Trias  
Senior Immigration Services Officer, USCIS Los Angeles County Field Office  
Los Angeles, CA