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**UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE OF IMMIGRATION REVIEW
IMMIGRATION COURT
BALTIMORE, MARYLAND**

In the Matter of:

Julian Ngongbo

In removal proceedings

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File No.: A 123-456-789

Immigration Judge Betsy Smith

Next Hearing: September 20, 2022

MOTION TO SUBSTITUTE COUNSEL

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Pursuant to 8 C.F.R. § 1003.17(b) and Section 2.3(i) of the Immigration Court Practice Manual, Respondent, by and through undersigned counsel, requests that the Court allow Elizabeth Miller to be substituted by Jane Doe as counsel of record in her removal proceedings. In support of this motion, Respondent states the following:

1. Respondent's next master calendar hearing is scheduled for September 20, 2022 at 8am.
2. Elizabeth Miller, a volunteer with the Immigration Justice Campaign and Rocky Mountain Immigrant Advocacy Network, previously filed an EOIR-28, Notice of Entry of Appearance as Representative, in Respondent's proceedings.
3. Attorney Miller represented Respondent while he was in immigration detention in Aurora, Colorado and his case was pending at the Aurora Immigration Court. Attorney Miller lives and works in Colorado.
4. After Respondent was released from immigration detention, his case was transferred to the Baltimore Immigration Court, where it is currently pending.
5. Jane Doe works in Washington, D.C. Attorney Doe is willing and able to represent Respondent in her removal proceedings before the Baltimore Immigration Court on a *pro bono* basis.
6. Attorney Doe's Form EOIR-28 is attached to this motion.
7. Respondent consents to having Attorney Miller be substituted by Attorney Doe as counsel in his removal proceedings before the Baltimore Immigration Court.
8. Attorney Doe is prepared to proceed with this case as scheduled and this substitution will not cause undue delay or prejudice to the Department.

9. Respondent requests that Elizabeth Miller's appearance be withdraw and that Jane Doe's be entered as the attorney of record in this matter.

Dated: _____

Respectfully submitted,

Jane Doe

CERTIFICATE OF SERVICE

I, [REDACTED], hereby certify that on [REDACTED] I served a copy of the foregoing [REDACTED] to the Office of Chief of Counsel by uploading it onto ECAS, in which the government participates, therefore, no separate service is required.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]