

XXXXXX, *Attorney for Respondent*
XXXXXX

**UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
DENVER IMMIGRATION COURT
DENVER, CO**

IN THE MATTER OF:

XXXXXX

Respondent

In Removal Proceedings.

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File No. A XXXXXXXX

Immigration Judge XXXXXX

Next Hearing: XXXXXX

RESPONDENT'S MOTION TO CHANGE VENUE

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RESPONDENT'S MOTION TO CHANGE VENUE

Comes now the Respondent, XXXXX, and moves this Honorable Court to change the venue of her removal proceedings from Denver, CO to San Francisco, CA. She seeks this change of venue pursuant to 8 CFR § 1003.20.

In support of her motion, Respondent states as follows:

- 1) On May 24, 2018, an officer of the U.S. Immigration and Customs Enforcement (ICE) granted Respondent's Request for Parole and she was released from the Cibola County Correctional Center.
- 2) Respondent's parole sponsor, XXXXXX, resides at XXXXX. Mr. XXX is a U.S. citizen and has agreed to support Respondent during the remainder of her immigration proceedings. Accordingly, Respondent will now reside with Mr. XXXXX in XXXX. Attached is a Change of Address reflecting this change.

- 3) Respondent has begun to search for new pro bono representation in her current jurisdiction.
- 4) Because Respondent is no longer detained in the Cibola County Correctional Center and because she will now reside in Santa Rosa, CA, she no longer falls under the jurisdiction of the Denver Immigration Court.
- 5) Finally, without a change of venue, Respondent and her counsel will experience considerable hardship and inconvenience in attending her Immigration Court hearings in Denver, CO.
- 6) The Department of Homeland Security would not be prejudiced as a result of a change of venue to San Francisco, CA.

Wherefore, for these reasons, Respondent requests that her case be transferred from Denver, Colorado to San Francisco, California so that she may reside with her parole sponsor and work with her attorney to complete her immigration proceedings.

Respectfully submitted,

XXXXX, Attorney for Respondent
XXXXXXX

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]