

Jane Doe, Esq.
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Boulder, CO 80303

**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: Not scheduled as of date of Motion filing

MOTION TO WITHDRAW AS COUNSEL

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Jane Doe, Esq., *pro bono* attorney for Julian Ngongbo, respectfully requests the court to permit her to withdraw from representing Mr. Ngongbo in **all proceedings**. In support of this motion, Attorney Doe asserts:

1. Attorney Doe represents Mr. Ngongbo *pro bono*.
2. Mr. Ngongbo was granted parole from the Aurora, CO detention facility, and relocated to the Baltimore, MD area on April 2, 2020.
3. On April 5, 2020, US Immigration Judge Steven Caley Ordered venue to be changed from the Immigration Court at Aurora, CO to Baltimore, MD. (*See Attachment A*).
4. Attorney Doe, a *pro bono* attorney, lives in Colorado and does not have the requisite time or funds to travel back and forth to Maryland to continue representing Mr. Ngongbo.
5. The reasons for Attorney Doe's withdrawal conform with pertinent state bar and ethical rules.
6. Mr. Ngongbo's last known address is: [ADD CURRENT ADDRESS]
7. Attorney Does has notified Mr. Ngongbo of her request to withdraw as counsel, and Mr. Ngongbo consents. (*See Attachment B*)
8. As of the date this Motion was drafted, [ADD DATE], Mr. Ngongbo has no pending hearing dates.
9. Attorney Doe is not aware of any other pending deadlines in this matter.

10. Attorney Doe has impressed upon Mr. Ngongbo the importance and necessity of meeting deadlines and appearing at future scheduled hearings.

11. Attorney Doe has conveyed to Mr. Ngongbo the possible consequence of failing to meet deadlines or appear at scheduled hearings.

In consideration of the foregoing, Attorney Doe respectfully requests the court to GRANT the motion to withdraw as counsel.

Jane Doe, Esq.

Date

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]