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**U.S. DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
U.S. IMMIGRATION COURT
BATAVIA, NEW YORK**

IN THE MATTER OF:)
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[REDACTED])
A# [REDACTED]) BOND PROCEEDINGS
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Respondent)

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MOTION FOR TELEPHONIC APPEARANCE

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Counsel respectfully requests that the Court allow her to appear telephonically in the Respondent’s bond proceedings, currently scheduled for February 25, 2014. Counsel is representing the Respondent *pro bono* from New York City, more than five hours away. Counsel is an employee of a not-for-profit organization that has limited resources for transportation to courts outside of the New York City area. Counsel agrees to appear in person if Mr. [REDACTED] is scheduled for an individual merits hearing in Batavia.

Counsel can be reached on the day of the hearing at [REDACTED].

THEREFORE, Counsel respectfully requests that she be permitted to appear telephonically.

RESPECTFULLY SUBMITTED this 18th day of February, 2014.

Rachel Kling, Esq.
Attorney for Respondent

PROOF OF SERVICE

On February 18, 2014, I, Rachel Kling, Esq., served a copy of this motion on DHS ICE Litigation, at the following address: 4250 Federal Drive, Batavia, New York 14020, via first class U.S. mail.

Rachel Kling, Esq.
Staff Attorney