

Jane Doe, Esq.  
1 Main Street  
Washington, DC 20005

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

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**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**

**UNITED STATES DEPARTMENT OF JUSTICE  
EXECUTIVE OFFICE OF IMMIGRATION REVIEW  
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**MOTION TO SUBSTITUTE COUNSEL**

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

**Julian Ngongbo**  
**A 123-456-789**

**Certificate of Service**

On May 25, 2021, I, Jane Doe, served a copy of this Motion to Substitute Counsel, Cover Page, E-28 of Jane Doe, and Proposed Order via US first-class mail to: Baltimore Office of Chief Counsel, Fallon Federal Building 31 Hopkins Plaza, Room 1600, Baltimore, MD, 21201 and via e-mail service to Elizabeth Miller.

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Joe Doe

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Date

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**ORDER OF THE IMMIGRATION JUDGE**

Upon consideration of Motion to Substitute Counsel, it is HEREBY ORDERED that the motion be  **GRANTED**  **DENIED** because:

- DHS does not oppose the motion.
- The respondent does not oppose the motion.
- A response to the motion has not been filed with the court.
- Good cause has been established for the motion.
- The court agrees with the reasons stated in the opposition to the motion.
- The motion is untimely per \_\_\_\_\_.
- Other:

Deadlines:

- The application(s) for relief must be filed by \_\_\_\_\_.
- The respondent must comply with DHS biometrics instructions by \_\_\_\_\_.

\_\_\_\_\_  
Date

\_\_\_\_\_  
[name]  
Immigration Judge

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Certificate of Service

This document was served by:

- Mail
- Personal Service

To:

- Alien
- Alien c/o Custodial Officer
- Alien's Atty/Rep
- DHS

Date: \_\_\_\_\_

By: Court Staff