**Jane Doe DETAINED**

**1 Main Street**

**Newark, NJ 07102**

**(973) 555-5555**

**UNITED STATES DEPARTMENT OF JUSTICE**

**EXECUTIVE OFFICE OF IMMIGRATION REVIEW**

**IMMIGRATION COURT**

**ELIZABETH, NEW JERSEY**

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

 )

In the Matter of: )

 )

**CLIENT’S NAME**  )

 )

Respondent ) File No.: **A\_\_\_\_\_\_\_\_\_\_**

In Removal Proceedings )

 ) Next Hearing: September 11, 2018 \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_) Immigration Judge: Hon. Mirlande Tadal

**MOTION TO CONTINUE**

Now comes the Respondent, by and through counsel, and moves this honorable court to continue the individual hearing in her case. In support of this motion, Respondent offers the following:

1. Undersigned counsel is a volunteer with the American Friends Service Committee (AFSC) and the Immigration Justice Campaign.
2. Counsel entered an appearance on Respondent’s behalf on (DATE). Counsel has agreed to represent the Respondent on a *pro bono* basis*.*
3. Respondent is seeking asylum in the United States and, in the alternative, withholding of removal and protection under the Convention Against Torture. Respondent submitted her I-589 application to the Court on (DATE).
4. Respondent’s case is calendared for an Individual Hearing before this Court on (DATE) and documents in support of Respondent’s I-589 application are due on (DATE).
5. While Counsel has been diligently working on this case, she needs additional time to meet with Respondent to properly prepare for the Individual Hearing. Counsel notes that she must travel three hours each way to meet with Respondent at the detention center.
6. Counsel also needs additional time to gather and prepare documents in support of Respondent’s asylum application. These documents include Respondent’s declaration and country conditions documents.
7. In light of Counsel’s recent entry of appearance and the amount of work that remains outstanding in Respondent’s case, Respondent respectfully requests a continuance of the (DATE) Individual Hearing.

Respectfully submitted this \_\_\_\_ day of \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, 2020

\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Date (NAME)

(ADDRESS)

(PHONE NUMBER)

**UNITED STATES DEPARTMENT OF JUSTICE**

**EXECUTIVE OFFICE FOR IMMIGRATION REVIEW**

**IMMIGRATION COURT**

**ELIZABETH, NEW JERSEY**

In the Matter of: CLIENT’S NAME File No. A\_\_\_\_\_\_\_\_\_

**ORDER OF THE IMMIGRATION JUDGE**

Upon Consideration of Respondent’s Motion to Continue, it is HEREBY ORDERED that the motion be  GRANTED  DENIED because:

* DHS does not oppose the motion.
* 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:

Date Immigration Judge Hon. Mirlande Tadal

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

**CERTIFICATE OF SERVICE**

I, \_\_\_\_\_\_\_\_\_\_\_\_\_, hereby certify that I served by hand-delivery a copy of this Motion to Continue in the case of **CLIENT’S NAME** (**A\_\_\_\_\_\_\_**) on:

Office of Chief Counsel

US Department of Homeland Security

625 Evans Street, Room 135

Elizabeth, NJ 07201

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

 Attorney’s name