**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: February 11, 2020 \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_) Immigration Judge: Hon. Mirlande Tadal

**MOTION TO CONVERT INDIVIDUAL HEARING INTO A MASTER CALENDAR HEARING**

Now comes the Respondent, by and through counsel, and moves this honorable court to convert her upcoming individual hearing into a master calendar hearing. 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’s case is calendared for an Individual Hearing before this Court on (DATE) and documents in support of Respondent’s application for asylum, withholding of removal, and Convention Against Torture protection are due on (DATE).
4. In order to adequately represent Respondent at her Individual Hearing, Counsel will need additional time to meet with Respondent and to prepare her for her hearing. Counsel notes that she needs to travel three hours each way every time she meets with Respondent at the detention center. In addition, Counsel intends to gather supporting evidence including a declaration from Respondent and country conditions documentation. Counsel also intends to prepare a legal brief to assist the Court in its analysis of the case.
5. In light of Counsel’s recent entry of appearance and the amount of work that is outstanding in Respondent’s case, Respondent respectfully requests that her (DATE) Individual Hearing date be converted into a Master Calendar 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 Convert Individual to Master, 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 Convert Individual to Master 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