Alison Hollenbeck

Northwest Immigrant Rights Project

402 Tacoma Ave. S, Suite 300

Tacoma, WA 98402

(206) 957-8669 direct

(253) 383-0111 fax

alison@nwirp.org email

**UNITED STATES DEPARTMENT OF JUSTICE**

**EXECUTIVE OFFICE FOR IMMIGRATION REVIEW**

**IMMIGRATION COURT**

**TACOMA, WASHINGTON**

|  |  |
| --- | --- |
| In the Matter of Client’s Last name, First name, Respondent |  **A #**  **IN BOND PROCEEDINGS** **DETAINED** |

**Bond Hearing: DATE And TIME**

**Immigration Judge NAME**

**RESPONDENT’S EVIDENCE PACKET**

**IN SUPPORT OF CUSTODY REDETERMINATION**

**Index of Documents**

| **Tab** |  | **Page** |
| --- | --- | --- |
| **A****B****C****D****E****F****G****H****I** | Declaration of ClientMarriage Certificate of Client and SpouseLetter from U.S. citizen wife, partner of 13 years, describing how Client helped her raise her three children from prior relationships, his dedication to their two children, and how he has taken care of her after both her legs were broken in an accident in 2009 Letter from Name, Client’s U.S. citizen 19-year-old stepdaughter, describing how Client “stepped in” as a father for her, how he’s taken care of the kids and is very caring, and how he supported her during her stay in a treatment facility two years agoLetter from Name, Client’s U.S. citizen 22-year-old stepson, discussing how Client has been part of the family since Son was 9 years old, that he works hard to care for family, and helps take care of Son’s son, GrandsonLetter from Name, Client’s U.S. citizen 16-year-old stepson, describing Client as supporting the family ever since he can remember Letter of support from U.S. citizen Name, Client’s supervisor for the past 10 years and friend, stating that Client is a very reliable and trustworthy family manLetter of support from Wife’s sister, Name, stating that she has known Client for more than 13 years, was a witness at their wedding, and he is kind and hard workingLetter of support from Wife’s sister, Name, stating that she has known Client for more than 13 years, and that he has been “very good and loving to” Wife for years, and takes “good care” of the family and his children | 1-345-89-101112131415 |
| **J****K** | Photos of Client with his family from 2006 to 2016  Client and his wife, Name, in March 2006 and March  2007 with her parents Client and Wife together in March 2007, and in 2008  with stepdaughter Name, and Client with stepson, Name, in 2014 Client playing with a niece and nephew in 2007, with his  grandson at Great Wolf Lodge around Christmas 2014 and  again with grandson in 2015 Client with new-born son shortly after his birth on Date in Tacoma  General Hospital, Client with Wife in her hospital room shortly after  Son’s birth   Client with son eating pizza in 2015, Client  holding Son 1 in son 2’s hospital room, shortly after Son 2’s  birth in Year; Client with grandson in about 2013  at the Puyallup Fair Client with son at Tumwater Falls Park, Client  holding both his sons in September 2015 and the spring of 2016Certificate of service  | 16-2116171819202122 |
|  |  |  |

Respectfully submitted this \_\_th day of January 2017.

 By: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

|  |
| --- |
| Alison HollenbeckNorthwest Immigrant Rights Project*Attorney for Client* |

**CERTIFICATE OF SERVICE**

I, NAME, hereby certify that a true and correct copy of the attached, **Respondent’s Evidence Packet in Support of Custody Redetermination**, was

\_\_\_ Mailed

\_\_\_ Hand delivered

\_\_\_ Served electronically on the Chief Counsel’s Office at seattleoccfilings@dhs.gov

\_\_\_ Placed in the ICE drop box inside the Northwest Detention Center

to:

Department of Homeland Security

Office of the Chief Counsel

1623 East J Street, Suite 2

Tacoma, WA 98421

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