UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
OFFICE OF THE IMMIGRATION JUDGE
BUFFALO, NEW YORK

In the Matter of:	)	
	)	**MOTION TO WAIVE RESPONDENT'S PRESENCE**
Catherine CLIENT,	)	
	)	
In Removal Proceedings.	)	**File No. A#000-000-000**

To: Honorable Immigration Judge Wiseman
Office of the Immigration Judge

MOTION TO WAIVE RESPONDENT'S PRESENCE

Respondent, CATHERINE CLIENT, by and through her counsel, Andrea Attorney, Esq. of Amazing Law Firm, submits a Motion to Waive Respondent's Presence at Respondent's Master Calendar Hearing scheduled for January 1, 20XX at 9:00AM, if Respondent's Motion for Change of Venue is denied, due to the financial burden Respondent will incur.

In support of this Motion, counsel states as follows:

1. Respondent is a victim of domestic violence and has filed a Petition for U Nonimmigrant Status, on Form I-918 ("Petition") with U.S. Citizenship and Immigration Services ("USCIS"). *See* **Exhibit B**, Copy of Form I-797, Notice of Action Receipt Notice for I-918, Petition for U Nonimmigrant Status (EACXXXXXXXX); **Exhibit A**, Copy of Respondent's Form I-918, Petition for U Nonimmigrant Status, with supporting documents. Respondent, a national and a citizen of Russia, was born on January 1, 19XX

in Moscow, Russia. *See* **Exhibit C**, Copy of Respondent's Passport. Respondent's Petition is currently pending adjudication with USCIS.

2. Respondent currently resides at [Address], which is in the jurisdiction of the New York City Immigration Court. *See* **Exhibit D**, Copy of Respondent's Notice to Appear, listing her current residential address; **Exhibit E**, Copy of Respondent's Lease, listing her current residential address. Respondent will continue to reside at this location for the duration of her immigration case. Since entering the U.S. as an H-1B visa holder, Respondent has continuously resided and worked in New York City, New York. Respondent's current telephone number is [phone #].
3. Respondent is receiving pro bono representation from Mrs. Andrea Attorney, Esq., of Amazing Law Firm, located at 123 Pro Bono Street, New York, NY 11111. Please see the enclosed EOIR-28, Notice of Entry of Appearance as Attorney. Amazing Law Firm is also located within the jurisdiction of the New York, New York Immigration Court.
4. Respondent has filed a Motion for Change of Venue and Written Pleadings with this Court, requesting that the venue be changed from the Immigration Court in Buffalo, New York, to the Immigration Court in New York, New York.
5. If Respondent's Motion for Change of Venue is denied, Respondent's files this Motion to Waive Respondent's Presence to appear at her Master Calendar Hearing due to the financial burden that Respondent will incur in order to attend the hearing. Respondent is currently without work authorization and is thus unable to work so that she may afford travel expenses. Therefore, Respondent requests that this Honorable Court grant her Motion to Waive Respondent's Presence should the Motion for Change of Venue not be granted prior to the scheduled hearing date.

6. Respondent's Counsel asks that this Honorable Court exercise its discretion to grant the Motion to Waive Respondent's Presence at the Master Calendar Hearing scheduled on January 1, 20XX at 9:00AM.

Respectfully submitted,

Dated: October __, 20XX

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Andrea Attorney
Amazing Law Firm
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