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UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
OFFICE OF THE IMMIGRATION JUDGE
New York, New York

In the Matter of:	)	**File No. A#000-000-000**
Catherine CLIENT,	)	
In Removal Proceedings	)	

Immigration Judge Wiseman **Master Hearing: January 1, 20XX at 9:00AM**

MOTION FOR TELEPHONIC TESTIMONY

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

In the Matter of:	)	
	)	**MOTION FOR TELEPHONIC TESTIMONY**
Catherine CLIENT,	)	
In Removal Proceedings.	)	**File No. A#000-000-0000**

MOTION FOR TELEPHONIC TESTIMONY

Respondent, Catherine Client, by and through her counsel, Andrea Attorney, Esq., hereby moves to allow the following witnesses to testify telephonically if at all at the individual hearing of Respondent:

1. Deborah Doctor is a New York State licensed physician (NYS License # _____), certified by the American Board of Obstetrics and Gynecology since 2010. She is currently an Assistant Professor in the Department of Obstetrics and Gynecology at the New York University of School of Medicine, and she practices at Bellevue Hospital in New York. Dr. Doctor has submitted an expert declaration of her clinical findings based on her clinical assessment and physical evaluation of Respondent. Dr. Doctor is providing her services in this case at a *pro bono* rate. Dr. Doctor is unable to appear in court due to competing work commitments, and will instead make herself available telephonically at: (212) 212-2121.

2. Dr. Psychologist is a Licensed Clinical Social Worker in the State of New York (NY License # 000000). In addition to maintaining a private practice, she is a consulting psychologist for Sanctuary for Families and an adjunct professor at New York University. She has submitted an expert declaration based on her clinical assessment and evaluation of Respondent. Dr. Psychologist is unable to appear in court due to competing work commitments, and will instead make herself available telephonically at: (212) 212-2121.

3. Dr. Country Conditions is an associate professor at the George Washington University in Washington, D.C., who specializes in women's rights in Russia. She has submitted an expert declaration on relevant country conditions after reviewing Respondent's personal statement and speaking with counsel. She is providing her services in this case at a pro bono rate. Dr. Country Conditions is unable to travel to New York as she is currently teaching at the George Washington University, and will instead make herself available telephonically at: (202) 202-2020.

In light of the foregoing, and for such other reasons as may appear to the Court, Respondent respectfully moves the Court to allow telephonic testimony of these expert witnesses.

Dated: October __, 20XX

Respectfully submitted,

_____

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