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NON-DETAINED

UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE OF IMMIGRATION REVIEW
IMMIGRATION COURT
800 DOLOROSA ST. SUITE 300
SAN ANTONIO, TX 78207

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

Immigration Judge Wiseman **Hearing of: January 1, 20XX**

RESPONDENT'S MOTION TO CHANGE VENUE

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IN THE MATTER OF:	)	
Catherine CLIENT	)	**File No.: A-000-000-000**
	)	**IN REMOVAL PROCEEDINGS**
Respondent	)	

RESPONDENT'S MOTION TO CHANGE VENUE

Respondent, by and through counsel Amazing Law Firm, hereby moves this Honorable Court to change the venue of these proceedings to the Immigration Court located at 26 Federal Plaza, New York, NY 10278. In support of this motion, Respondent states the following:

1. The Respondent is currently scheduled for an initial Master Calendar hearing before Immigration Judge Honorable Wiseman in San Antonio, TX on January 1, 20XX. (See **EXHIBIT A**). According to the Notice of Hearing, the Court currently maintains the proper address for the Respondent, namely: **123 Home Street, New York, NY 11111**.

2. Respondent was released from DHS detention with the understanding that she would live with her sister in New York, NY at 123 Home St. (See **EXHIBITS B, E**). She currently resides with her sister at that address.

3. The Respondent is represented in this matter *pro bono* by Amazing Law Firm, a law firm. (See **EXHIBITS D, E**).

4. Respondent concedes service of the Notice to Appear dated September 17, 20XX and ***admits to factual allegations 1-5 contained therein***, and concedes removability. (See **EXHIBIT B**).

5. Counsel has explained to the Respondent the following:

    a. The rights set forth in 8 C.F.R. § 1240.10(a);
    b. The consequences of failing to appear in court as set forth in INA § 240(b)(5);
    c. The limitation on discretionary relief for failure to appear set forth in INA § 240(b)(7);

d. The consequences of knowingly filing or making a frivolous application as set forth in INA § 208(d)(6);
e. The requirement to notify the court within five days of any change of address or telephone number, using Form EOIR-33/IC pursuant to 8 C.F.R. § 1003.15(d).

6. The Respondent respectfully declines to designate a suitable country for removal, should it become necessary.

7. In defense of removal, Respondent will apply for asylum, withholding of removal, and protection under the Convention Against Torture. Ms. Client's former domestic partner attacked her, raped her at gunpoint, and threatened her life and the lives of her children on many occasions. Her application and supporting evidence have been submitted to this Court under separate cover.

8. The Department of Homeland Security ("DHS") maintains a litigation office located at 26 Federal Plaza, 11th Floor, New York, NY 10278. As this office is located in the same building as the New York Immigration Court, DHS will not be unfairly prejudiced should this Court grant the instant motion.

9. Therefore, for the reasons stated above and in the interest of conserving judicial economy, the Respondent hereby moves this Court to change the venue of these proceedings to the New York Immigration Court.

Respectfully,

_____

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Dated: NEW YORK, NEW YORK
October __, 20XX