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NON-DETAINED

UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
IMMIGRATION COURT
NEW YORK, NEW YORK

In the Matter of	:	
	:	
Catherine CLIENT	:	**File Number: A# 000-000-000**
	:	
	:	
In Withholding of Removal	:	
Proceedings	:	
	:	

Immigration Judge Wiseman **Next Hearing: January 1, 20XX at 8:30 a.m.**

RESPONDENT'S LIST OF WITNESSES

Respondent, Catherine Client, by and through her counsel, Andrea Attorney, Esq., of Amazing Law Firm, hereby submits her proposed witness to testify in support of Respondent's individual hearing.

I. Proposed Witnesses

1. Paula Psychologist, Psy.D.
    a. Respondent proposes Dr. Psychologist as an expert witness to testify in the areas of psychology and treatment of patients with particular focus on trauma and grief. Her curriculum vitae is attached as Tab A.

    b. Dr. Psychologist conducted a psychological evaluation of Respondent on March 21, 20XX. Dr. Psychologist's affidavit of Respondent's psychological evaluation was submitted to the Court on March 31, 20XX. Dr. Psychologist will testify as to the mental health of Respondent, Respondent's trauma resulting from being part of a minority social group, the effects withholding would have over Respondent, and the conclusions from Respondent's psychological evaluation. The direct testimony is expected to last no more than a twenty minutes.

2. Eddie Expert, PH.D.
    a. Respondent proposes Dr. Expert as an expert witness to testify in the area of homosexuality, violence, and country conditions in El Salvador. His curriculum vitae attached is as Tab B.

    b. Dr. Expert's declaration was submitted to the Court on April 24, 20XX. Dr. Expert will testify about the current country conditions for women who identify themselves as lesbians and the danger Respondent would face if returned to El Salvador and she lived as openly lesbian woman. The direct testimony is expected to last no more than a thirty minutes.

3. Henry HUSBAND (A# 000-000-001)
    a. Respondent proposes her husband, Mr. Husband to testify about the past persecution she has endured in El Salvador on account of her being a black business woman and about her fear of future persecution if she were to return to El Salvador and live as openly lesbian woman. Mr. Husband will also testify that he and his wife, who both identify as gay and lesbian respectively, first became a couple to protect each other and later conceived a child to avoid suspicions of their true sexual orientations.

    b. Mr. Husband will be testifying in Spanish and will require an interpreter. The direct testimony is expected to last no more than a thirty minutes.

c. Mr. Husband is presently in removal proceedings before the Immigration Court in Baltimore, Maryland.

d. Mr. Husband and Respondent's Marriage Certificate is attached as Tab C.

4. Elizabeth CHILD (A#000-000-002)

a. Respondent proposes her daughter, Ms. CHILD, to testify about the past persecution Respondent endured in El Salvador on account of her race and on account of being a black business woman. Ms. CHILD will also testify about her and her mother's inability to safely relocate in El Salvador after two failed attempts when the gangs who persecuted them, found them each time.

b. Ms. CHILD is presently under an Order of Supervision by the U.S. Immigration and Customs Enforcement (ICE), Baltimore Office. She may not travel for more than 48 hours outside the State of Maryland without notifying the Baltimore ICE Office. A copy of her Order of Supervision is attached as Tab D.

c. Ms. CHILD will be testifying in Spanish and will require an interpreter. The direct testimony is expected to last no more than a twenty minutes.

d. A copy of the Judgment of Ms. CHILD's Civil Registry is attached as Tab E.

WHEREFORE, Respondent, respectfully requests the Court accept the proposed witnesses to testify in support of Respondent's individual hearing.

Date: October __, 20XX

Respectfully submitted,

_____

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a	Dr. Psychologist, Psy.D., Curriculum Vitae;……..……	
B	Dr. Expert, Ph.D., Curriculum Vitae;.....	
c	Marriage Certificate of Henry Husband and Catherine Client, Translation, and Affidavit of Translation;……..	
d	Copy of Elizabeth Child's (A#000-000-002) Order of Supervision;……..	
e	Judgment of Civil Registry for Elizabeth Child, Translation, and Affidavit of Translation;…….	