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UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
IMMIGRATION COURT
26 FEDERAL PLAZA
NEW YORK, NY 10278

In the Matter of	)	
	)	
Catherine CLIENT	)	**Master Calendar Hearing:**
A 000-000-000	)	**Not yet scheduled**
	)	
In Removal Proceedings	)	**Immigration Judge Wiseman**
	)	
	)	

MOTION FOR CHANGE OF VENUE

Respondent, Catherine Client, through counsel, hereby requests that this court change venue of her removal hearing from Atlanta, Georgia to New York, New York, pursuant to 8 C.F.R. §§1003.20.

I. PROCEDURAL HISTORY

On August 20, 19XX the Immigration Judge Doe (the "IJ") denied the Respondent's applications for asylum, withholding of removal and relief under the Convention Against Torture.

The Respondent, through her prior attorney, appealed the decision to the Board of Immigration Appeals ("BIA") and submitted a brief in support of the appeal. In June 20XX, the BIA remanded the Respondent's case to the IJ due to a defective tape record

of the individual hearing. The Judge was instructed to complete the transcript of the proceedings. The IJ issued a new written decision on August 21, 20XX. Respondent submitted a second brief in support of the appeal to the BIA on June 7, 20XX.

On December 17, 20XX, the BIA ordered the case remanded to the Immigration Judge for further proceedings and entry of a new decision. The case was transferred back to the Immigration Court in Atlanta, Georgia. It has not yet been scheduled for a hearing.

II. REQUEST FOR CHANGE OF VENUE

The Respondent is currently living at the following address: 123 Home Street, New York, NY 11111.

The Respondent requests a change of venue to the Immigration Court in New York, NY. The Order to Show Cause was filed in New York, NY, but venue was changed to Atlanta when Respondent moved to Atlanta in 19XX. Respondent has since moved back to New York City and has no further connection to Atlanta. Travel to and from Atlanta, Georgia would cause great expense to the Respondent. In addition, Respondent has obtained counsel in New York City who is now familiar with the lengthy and complex history of Respondent's case. It would be difficult and costly for Respondent to obtain new counsel in Atlanta or pay for present counsel to travel to Atlanta for future hearings. Therefore, Respondent has shown good cause for the request to change venue.

The Office of the Chief Counsel would not suffer any prejudice as the result of venue being changed to New York, NY.

WHEREFORE, Respondent requests that this court grant her Motion to Change Venue to New York, NY.

Respectfully submitted,

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Dated: October __, 20XX