[Attorney Name] [State Bar No.] *Non-Detained*

[Firm Name]

[Address 1]

[Address 2]

**UNITED STATES DEPARTMENT OF JUSTICE**

**EXECUTIVE OFFICE FOR IMMIGRATION REVIEW**

**IMMIGRATION COURT**

**[CITY, STATE]**

)

In the Matter of: )

)

[FIRST NAME LAST NAME(S)] ) File No.: A 000-000-000

)

)

Respondent )

)

In removal proceedings )

)

Immigration Judge: [First Name MI Last Name] Next Hearing: [Date Time]

**RESPONDENT’S MOTION TO INCREASE PRE-HEARING BRIEF PAGE LIMIT**

**RESPONDENT’S MOTION TO INCREASE PRE-HEARING BRIEF PAGE LIMIT**

Respondent, through undersigned counsel, moves the Immigration Judge to allow her to increase the page limit for her pre-hearing brief, due on [DATE]. In support of her motion, Respondent, through undersigned counsel, states as follows:

1. The Immigration Court Practice Manual published on February 20, 2020 imposes a new 25-page limit for pre-hearing briefs, whereas previously there had been no page limit.
2. The initial draft of Respondent’s pre-hearing brief had been substantially completed by the time the new page limit was imposed.
3. The initial draft of Respondent’s brief was approximately [#] pages long.
4. Respondent is still awaiting the receipt of her psychological evaluation and an expert affidavit, and thus sections of her brief remain undrafted.
5. Respondent’s estimates that the completed pre-hearing brief will be approximately [40] pages long.
6. Granting this motion would not cause the government any prejudice nor this court any delay.

WHEREFORE, Respondent prays the Immigration Judge grant her motion to increase the page limit of her pre-hearing brief from 25 pages to [40 pages] in length.

Respectfully submitted this March \_\_\_, 2020,

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

[Attorney Name]

[Firm Name]

[Address 1]

[Address 2]

Phone:

E-mail:

**UNITED STATES DEPARTMENT OF JUSTICE**

**EXECUTIVE OFFICE FOR IMMIGRATION REVIEW**

**IMMIGRATION COURT**

**CITY, STATE**

In the Matter of: FIRST NAME LAST NAME(S) File No.: A 000-000-000

**ORDER OF THE IMMIGRATION JUDGE**

Upon consideration of Respondent’s Motion to Increase Pre-hearing Brief Page Limit, it is HEREBY ORDERED that the motion be □ **GRANTED** □ **DENIED** because:

* DHS does not oppose the motion.
* The Respondent does not oppose the motion.
* A response to the motion has not been filed with the court.
* Good cause has been established for the motion.
* The court agrees with the reasons stated in the opposition to the motion.
* The motion is untimely per \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_.
* Other:

Deadlines:

* The application(s) for relief must be filed by \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_.
* The respondent must comply with DHS biometrics instructions by \_\_\_\_\_\_\_\_\_\_\_\_\_.

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Date Immigration Judge

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Certificate of Service

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Date: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ By: Court Staff \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

In the Matter of: FIRST NAME LAST NAME(S) File No.: A 000-000-000

**PROOF OF SERVICE**

On , I, ,

served a copy of this Motion to Increase Pre-hearing Brief Page Limit

and any attached pages to DHS Office of Chief Counsel

at the following address \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Attorney Name Date