**Module 3: Pretrial Practice and Motions**

**Exercise: Draft Pleadings and Motions to Change Venue, for Administrative Closure, and to Continue**

*Part 2: Motion for Administrative Closure and, in the Alternative, Motion to Continue*

Mr. Reyes Santiago’s case was successfully moved to Charlotte and his next Master Calendar Hearing is scheduled for March 4, 2021. He has discussed with you that although he has searched, he is lacking proof that he has been living in the US for the past 10 years. He would like to pursue his U Visa so his wife and undocumented son can also obtain U status as his derivatives. He is hopeful that he will be granted deferred action soon and cannot really afford to pay an attorney to represent him to prepare an application for Cancellation of Removal, so he would like for you to see if you can get his case administratively closed or at least continued.

**Prepare a Motion for Administrative Closure and, in the Alternative, a Motion to Continue.**

Client Name: Jose Reyes Santiago

Alien Number: 277-888-000

Address: 123 Hideaway Street, Charleston, SC 29407

Phone: 843-200-5566

Office of Chief Counsel: ICE Office of Chief of Counsel, 180 Ted Turner Blvd. SW, Suite 332, Atlanta, GA 30303

Complete the template below with the relevant details, and upload it into the following course component.

ATTORNEY NAME NON-DETAINED

STREET A #277-888-000

Charleston, SC 29407

Tel (843)

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Email:

UNITED STATES DEPARTMENT OF JUSTICE

**EXECUTIVE OFFICE FOR IMMIGRATION REVIEW**

**IMMIGRATION COURT**

**CHARLOTTE, NORTH CAROLINA**

IN THE MATTER OF: )

)

**JOSE REYES SANTIAGO )**

) File No.: A # 277-888-000

)

In Removal Proceedings )

)

)

MOTION FOR ADMINISTRATIVE CLOSURE AND, IN THE ALTERNATIVE, MOTION TO CONTINUE

The Respondent, by and through undersigned counsel, makes the following Motion:

FACTUAL AND PROCEDURAL HISTORY:

[COMPLETE THIS SECTION]

LEGAL ARGUMENT:

[COMPLETE THIS SECTION]

WHEREFORE, based on the foregoing and good cause shown, undersigned counsel respectfully requests that this case be administratively closed until such time as USCIS has adjudicated the U Visa application, in the alternative, counsel requests a continuance of this matter and that this matter be placed on the Status Docket until such time as USCIS has adjudicated his U Visa application.

Respectfully submitted this \_\_\_ day of \_\_\_\_\_\_, 20XX, by,

Attorney Name

Attorney for Respondent

EOIR#

Street

Charleston, South Carolina 29407

Phone

Fax

Email