

**NONDETAINED**

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

*Pro Bono Counsel for Respondent*

**UNITED STATES DEPARTMENT OF JUSTICE  
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW  
IMMIGRATION COURT  
BALTIMORE, MARYLAND**

\_\_\_\_\_  
In the Matter of: )  
)  
[REDACTED] )  
)  
In Removal Proceedings )  
\_\_\_\_\_ )

File No. A [REDACTED]

**Immigration Judge** [REDACTED]

**Next Hearing:** [REDACTED]

**MOTION TO ADVANCE**

UNITED STATES DEPARTMENT OF JUSTICE  
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW  
IMMIGRATION COURT  
BALTIMORE, MARYLAND

\_\_\_\_\_  
In the Matter of: )  
 )  
 [REDACTED] )  
 )  
In Removal Proceedings )  
 )  
File No. A [REDACTED] )  
\_\_\_\_\_ )

**MOTION TO ADVANCE INDIVIDUAL HEARING**

As *pro bono* counsel of record for [REDACTED], I respectfully request that the Court grant a motion advancing [REDACTED] individual hearing, per the authority given at 8 C.F.R. § 1003.23(a) and Chapter 5.10(b) of the Immigration Court Practice Manual. In support of this motion, I hereby state:

1. That my name and contact information is as follows: [REDACTED]  
[REDACTED]  
[REDACTED]
2. That the Respondent's name and address is as follows: [REDACTED]  
[REDACTED] [REDACTED] [REDACTED]
3. That I, as counsel, am prepared to move forward with the case soon as is practicable.
4. The client has specifically requested that a motion to advance be filed and wishes to have her application for asylum, withholding, and Convention Against Torture

protection heard as soon as possible. [REDACTED] merits hearing was scheduled for [REDACTED], but was delayed at the last minute because her biometric information had not been updated by the United States Citizenship and Immigration Services. The new hearing is scheduled for [REDACTED], almost two years from now.

5. [REDACTED] has led a difficult and insecure life, and came to the United States fleeing systematic domestic abuse in [REDACTED]. She suffers from Post-Traumatic Stress Disorder from her years of abuse and is psychologically fragile. She lost her first child in childbirth and is now trying to build a stable life in the United States for her and her seven-month old U.S. citizen child. Delaying her merits hearing by two years because of a clerical error she had no hand in would severely impact her life and the life of her child.
6. Asylum, by its very nature, is a form of humanitarian relief. [REDACTED] experiences in [REDACTED] and her subsequent mental trauma make her a particularly deserving candidate for relief. Given her insecure circumstances, the court should exercise its discretion to grant her motion to advance her individual hearing.

Respectfully submitted,

Date: \_\_\_\_\_

\_\_\_\_\_  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

*Pro Bono Counsel for Respondent*

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing Motion to Advance and all attachments were served via first-class, postage prepaid mail on:

(your trial attorney, if you know the individual name yet)  
Office of the Chief Counsel  
Department of Homeland Security  
Fallon Federal Building  
31 Hopkins Plaza, Room 1600  
Baltimore, MD 21201

This \_\_\_\_\_ day of August, 2013.

\_\_\_\_\_  
[Redacted signature block]

*Pro Bono Counsel for Respondent*