**Warren Craig NON-DETAINED**

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***Pro bono* counsel for Respondent**

**UNITED STATES DEPARTMENT OF JUSTICE**

**EXECUTIVE OFFICE FOR IMMIGRATION REVIEW**

**IMMIGRATION COURT**

**LOS ANGELES, CALIFORNIA**

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

 **)**

**In the Matter of: )**

 **)**

**Respondent’s Name )** **File No: A XXX XXX XXX**

 **)**

 **)**

**In Removal Proceedings )**

**\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ )**

**Immigration Judge:**

**Individual Hearing:**

**RESPONDENT’S MOTION TO PERMIT TELEPHONIC TESTIMONY OF WITNESS**

**In Re:**

**Respondent’s Name File No: A XXX XXX XXX**

**RESPONDENT’S MOTION TO PERMIT TELEPHONIC TESTIMONY OF WITNESSES**

 The Respondent, by undersigned counsel, respectfully moves the Immigration Judge to permit telephonic testimony of \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ and \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ at his upcoming merits hearing scheduled for \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_. Both witnesses are Belizean citizens who live in Belize, and both have information that is material to the Respondent’s claim for asylum.

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ was the Respondent’s former common law partner when the Respondent lived in Belize. This witness would testify regarding \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_. Her testimony would last approximately 30 minutes, and she would testify in English. She can be reached at \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_.

\_\_\_\_\_\_\_\_\_\_\_\_\_\_ is the \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_. This witness would testify regarding the statements in her declaration, including \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_. Her testimony would last approximately 30 minutes, and she would testify in English.

 Therefore, the Respondent respectfully requests that \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ and \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_be permitted to testify telephonically at his individual hearing scheduled for \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_. Attached, for the Immigration Judge’s convenience, is a proposed order regarding this matter.

Dated Respectfully submitted,

March 6, 2023 \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Warren Craig

Human Rights First

Attorney for Respondent

**UNITED STATES DEPARTMENT OF JUSTICE**

**EXECUTIVE OFFICE FOR IMMIGRATION REVIEW**

**IMMIGRATION COURT**

**LOS ANGELES, CALIFORNIA**

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**In the Matter of: )**

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**Respondent’s Name ) File No: A XXX XXX XXX**

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 **)**

**In Removal Proceedings )**

**\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ )**

**ORDER OF THE IMMIGRATION JUDGE**

Upon consideration of the **RESPONDENT’S MOTION TO PERMIT TELEPHONIC TESTIMONY OF WITNESSES**, it is HEREBY ORDERED that the motion be:

 [ ] **GRANTED** [ ] **DENIED** because:

 [ ]⁯ DHS ( ) opposes ( ) does not oppose the motion.

 [ ]⁯ The respondent ( ) opposes ( ) does not oppose the motion.

 [ ]⁯ A response to the motion ( ) has ( ) has not been filed.

 [ ]⁯ Good cause ( ) has been ( ) has not been established for the motion.

 [ ]⁯ The Court ( ) agrees ( ) does not agree with the opposition to the motion.

 [ ]⁯ The motion is untimely per .

 [ ]⁯ Other: .

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

Date Hon. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

 Immigration Judge

Certificate of Service

This document was served by: [ ] Mail [ ] Personal Service

To: ⁯ Alien ⁯ Alien c/o Custodial Officer ⁯ Alien’s Atty/Rep ⁯ DHS

Date: . Court Staff: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**In Re:**

**Respondent’s Name File No: A XXX XXX XXX**

**CERTIFICATE OF SERVICE**

I, Warren Craig, certify that a true and correct copy of the following, specifically described document(s): **Respondent’s Motion to Permit Telephonic Testimony of Witnesses** was properly served on the ICE of the DHS on March 6, 2023 by e-service to:

 Department of Homeland Security

 ICE

 Office of Chief Counsel

606 S. Olive St, 8th Floor

Los Angeles, CA 90014

Date: March 6, 2023 \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

 Warren Craig

 Supervising Senior Staff Attorney

 Human Rights First