

MOTION TO RECALENDAR AND TERMINATE REMOVAL PROCEEDINGS
WITHOUT PREJUDICE

COMES NOW, Client Name (hereinafter “Respondent”), by and through undersigned counsel, asks that this Court grant this Motion to Recalendar and Terminate Removal Proceedings Without Prejudice for the following reasons:

- 1) Respondent, Client Name, is an # year-old native and citizen of _____.
- 2) Respondent was designated as an Unaccompanied Alien Child upon arriving in the United States on Date, Year and placed in the custody of the Office of Refugee Resettlement (ORR). **Exhibit A.**
- 3) Respondent filed an I-589 Application for Asylum and Withholding of Removal with the USCIS Nebraska Service Center on Date, Year. **Exhibit B.**
- 4) Respondent’s Immigration Court proceedings were administratively closed in Arlington, Virginia before Judge Name on Date, Year at 9:00am. **Exhibit C.**
- 5) On Date, Year, Respondent completed his first asylum interview with the USCIS Arlington Asylum Office and a subsequent follow-up interview on Date, Year. **Exhibit D.**
- 6) On Date, Year, USCIS found that Respondent met the definition of refugee under the Immigration and Nationality Act Section 208(a) and granted him asylum. **Exhibit E.**
- 7) It follows that Respondent requests this Court recalendar and terminate these proceedings.
- 8) Per 8 C.F.R. § 1240.12(c), an Immigration Judge can order removal proceedings to be terminated.

- 9) The termination of proceedings will not cause prejudice to the U.S. government nor this Court and does not constitute a final judgment rendered on the merits of any issue in these proceedings. 8 C.F.R. § 1239.2(c).

For the foregoing reasons, we respectfully request that this Honorable Court grant Respondent's Motion to Recalendar and Terminate Removal Proceedings Without Prejudice and that the master calendar hearing in the above-captioned matter be cancelled.

Dated: Date, Year

Respectfully submitted,

By: _____

Mari Dorn-Lopez
Attorney for Respondent
CAIR Coalition
1612 K St, NW, Suite 204
Washington, DC 20006

UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
IMMIGRATION COURT
ARLINGTON, VA

_____)
In the Matter of:)
))
CLEINT NAME)
))
In Removal Proceedings)
))
Respondent)
_____)

File No.: A 123 456 789

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**UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
OFFICE OF THE IMMIGRATION JUDGE
Arlington, Virginia**

In the Matter of: Client Name _____

A Number: A 123 456 789

ORDER OF THE IMMIGRATION JUDGE

Upon consideration of Respondent's Motion to Terminate Proceedings Without Prejudice, 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 to the reasons stated in the opposition to the motion.
- The motion is untimely per: _____.
- Other:

Deadlines:

- The application(s) must be filed by: _____.
- The respondent must comply with DHS biometrics instructions by: _____.

Date: _____, 20__ _____
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: _____ By: Court Staff: _____

**UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
OFFICE OF THE IMMIGRATION JUDGE
Arlington, Virginia**

In the Matter of: Client Name

A Number: A 123 456 789

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**UNITED STATES DEPARTMENT OF JUSTICE
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OFFICE OF THE IMMIGRATION JUDGE
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A Number: A 123 456 789

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This document was served by: [] Mail [] Personal Service
To: [] Alien [] Alien c/o Custodial Officer [] Alien's Atty/Rep [] DHS
Date: _____ By: Court Staff: _____

PROOF OF SERVICE

On _____, I _____,
(date)

served a copy of this: Motion to Recalendar and Terminate Removal Proceedings Without
Prejudice

and any attached pages to: The Office of Chief Counsel

at the following address: 1901 Bell Street 9th Floor

Arlington, Virginia 22202

By (check one): first-class mail courier service hand-delivery.

Signature

Date