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DETAINED

UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
IMMIGRATION COURT
880 Front Street, Suite 4240
San Diego, CA 92101

In the Matter of	)	
Isabelle Kauany Bueno Ferreira	)	**File No. A 246-934-756**
In Removal Proceedings	)	

Immigration Judge: **Attia, Olga E.** Next Master Hearing: **September 22, 2026, 8:30 AM**

RESPONSE TO ORDER TO SHOW CAUSE

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Undersigned counsel, Otavio Haverroth Silva, respectfully submits this Response to the Court's September 10, 2026 Order to Show Cause and states as follows:

I. BACKGROUND

1. Undersigned counsel is the primary attorney of record for Respondent, Isabelle Kauany Bueno Ferreira, who is currently detained in DHS custody.
2. Respondent was scheduled for an internet-based Master Calendar Hearing before this Court on September 10, 2026, at 09:30 am.
3. To ensure that Respondent remained fully represented and that proceedings were not delayed, undersigned counsel proactively arranged for EOIR-registered attorney Natalia Lertora-Sznajder (EOIR ID: YG360857) to appear on his behalf for the scheduled hearing.
4. Accordingly, a Form EOIR-28 identifying Attorney Lertora-Sznajder's proposed appearance "on behalf of" undersigned counsel was prepared and submitted to the Immigration Court prior to the hearing.
5. A paper Form EOIR-28 was executed and sent by overnight mail in accordance with the guidance set forth in the EOIR Policy Manual, Part I, Chapter 5.3(g), which provides that "[t]he practitioner making the appearance must file paper-file a Form EOIR-28 with the immigration court and serve it on the opposing party."
6. A copy of Attorney Natalia Lertora-Sznajder's Form EOIR-28 was also provided

electronically to the Court and attached to Respondent's case record as supporting evidence. Because electronic filing of the EOIR-28 was not the prescribed method under the applicable Policy Manual guidance, the electronic submission was provided to ensure that the Court received a copy promptly. The electronic submission was accepted and became part of the record. *See* Evidence.

7. On September 10, 2026, Attorney Lertora-Sznajder timely connected to the Court's designated Webex hearing platform and remained in the virtual waiting room for approximately two and one-half hours, until the conclusion of the hearing, continuously available and prepared to proceed with Respondent's hearing. *See* Exhibits A and B.
8. However, Attorney Natalia Lertora-Sznajder was never admitted from the virtual waiting room and thus did not have an opportunity to address the Court or present her appearance.

II. RESPONSE TO THE COURT'S ORDER

Undersigned counsel respectfully submits that the circumstances surrounding the September 10, 2026 hearing did not result from an intentional failure to appear, abandonment of Respondent, disregard of the Court, or a failure to make arrangements for Respondent's representation.

To the contrary, the circumstances surrounding the September 10, 2026 hearing reflect that undersigned counsel made affirmative arrangements for Respondent's representation before the hearing. Counsel did not simply fail to attend the hearing or leave Respondent without arrangements for representation. Rather, counsel arranged qualified coverage in advance, prepared and submitted the corresponding appearance documentation, and ensured that covering counsel was timely connected to the Court's designated platform and remained available for approximately two and one-half hours.

The arrangement was made in reliance upon the procedure described in EOIR Policy Manual, Part I, Chapter 5.3(g), concerning an attorney appearing "on behalf of" the practitioner of record at a particular hearing. Chapter 5.3(g) expressly recognizes that an attorney may appear "on behalf of" the practitioner of record at a specific Immigration Court hearing, provided that the attorney files the required paper Form EOIR-28 and the Immigration Judge authorizes the appearance. *See* EOIR Policy Manual, Part I, Ch. 5.3(g). Counsel's posture is consistent with such guidance. Undersigned counsel therefore acted in good faith in attempting to utilize a form of appearance expressly contemplated by the EOIR Policy Manual, while recognizing that such an appearance remained

subject to authorization by the Immigration Judge.

Counsel does not seek to dispute the Court's decision not to authorize the proposed appearance. Rather, the purpose of this Response is to provide the factual circumstances surrounding the September 10 hearing and the efforts made in advance to ensure Respondent's representation.

Attorney Lertora-Sznajder timely connected to Webex and remained continuously available for approximately two and one-half hours, prepared to proceed. The record therefore does not reflect a situation in which counsel simply failed to attend the hearing or failed to make arrangements for Respondent's representation. Counsel arranged qualified coverage in advance, prepared and submitted the corresponding appearance documentation, and ensured that covering counsel was present and available at the appointed time. These circumstances demonstrate a good-faith effort to ensure Respondent's representation notwithstanding the Court's decision not to authorize the proposed appearance.

III. STEPS TAKEN TO AVOID ANY FUTURE ISSUE

Following receipt of the Court's Order, undersigned counsel reviewed the circumstances and the Court's stated expectations regarding appearances by additional counsel.

To avoid any similar issue in future proceedings, Attorney Durcio Belz dos Reis (EOIR ID: AA029957) has entered a formal appearance as non-primary counsel of record in Respondent's case. *See* Form EOIR-28, filed on September 17, 2026.

This step was taken to ensure that any future appearance by additional counsel is formally reflected in the Record of Proceedings, including the next master calendar hearing scheduled for September 22, 2026, in accordance with this Court's order.

IV. CONCLUSION

Counsel sincerely regrets any inconvenience or disruption caused to the Court and takes seriously his professional obligations to both Respondent and the Court.

The record reflects that counsel made affirmative, good-faith efforts to ensure Respondent's

representation at the September 10, 2026 hearing and has since implemented an additional procedural safeguard to avoid any similar issue in future proceedings. Counsel respectfully submits that these circumstances constitute sufficient cause in response to the Court's Order.

WHEREFORE, Counsel respectfully requests that the Court deem this Response sufficient to satisfy the September 10, 2026 Order to Show Cause and discharge the Order.

Respectfully submitted,



Otavio Haverroth Silva (Bar N.343486)
Attorney at Law
P.O. Box 90487, San Diego, CA 92169
(510) 241-9336
Counsel for Respondent

Exhibit list

Exhibits:	Pages:
Exhibit A	
Evidence of Covering Counsel’s Timely Webex Appearance and Availability Throughout the Hearing	1
Exhibit B	
Attorney Natalia Lertora-Sznajder's Declaration	2-3

Exhibit A


12:01
Mail
5G
52
IA
IJ Olga Attia's
Personal Room
Thanks for waiting. We've let the host know that you're here.
6 other people are waiting in the lobby

Exhibit B

DECLARATION OF NATALIA LERTORA-SZNAJDER

I, Natalia Lertora-Sznajder, declare under penalty of perjury under the laws of the United States of America that the following is true and correct:

1. I am an attorney licensed and in good standing to practice law in California. My State Bar No. is 293036. My contact information is: (510) 747-8017; natalia@mirrorpbc.com and naty.sznajder@gmail.com.

2. I was engaged to appear on September 10, 2026, on behalf of Otavio Haverroth Silva, for a Master Calendar Hearing in the matter of Respondent **Isabelle BUENO FERREIRA (A-246-934-756)**, before the Immigration Court in Adelanto, California, presided over by Immigration Judge Olga Attia.

3. The hearing was scheduled to be conducted remotely via Webex.

4. I logged into the Webex virtual waiting room/lobby for the hearing at approximately 9:29 a.m. Upon logging in, the waiting room displayed a notice indicating that approximately 19 other individuals were also waiting.

5. I remained logged into the Webex waiting room continuously from that time forward. The only interruptions during this period were brief moments, lasting only seconds, in which my video connection dropped or I was disconnected by the system; each time, I logged back in immediately.

6. At no point during this period was I called into the hearing, admitted from the waiting room, or given the opportunity to identify the case or client I was appearing for.

7. At approximately 12:04 p.m., I received a phone call from Carolina Piazza, of the law office of Otavio Haverroth Silva, and logged out of the Webex waiting room to take that call. At the time I logged out, the waiting room still displayed approximately 6 individuals waiting, including myself. I took a screenshot of the waiting room at that time, showing the number of individuals still waiting, a true and correct copy of which is attached hereto as Exhibit A.

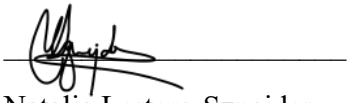
8. During that call with Carolina Piazza, I was informed that the hearing in this matter had already been conducted and concluded, and that the Immigration Judge had addressed a continuance directly with the respondent because her attorney was not present, without my having been called into the hearing or given any opportunity to appear on the record.

9. Carolina Piazza subsequently spoke with the court's clerk, who informed her that Immigration Judge Attia does not permit attorneys to appear "on behalf of" the attorney of record. This was the first time I learned of this practice. Had I been informed of this during the hearing itself, I would have contacted Mr. Haverroth Silva's office immediately in an effort to resolve the issue before the matter concluded.

10. At no time between 9:29 a.m. and 12:04 p.m. was I contacted by court staff, the Immigration Judge, or anyone else regarding this matter, nor was I informed that the hearing had been called or concluded.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on September 11, 2026, at Oakland, California.



Natalia Lertora-Sznajder

Isabelle Kauany Bueno Ferreira **File No. A 246-934-756**

Proof of Service

On September 17, I, Otavio Haverroth Silva, served a copy of the following documents:

RESPONSE TO ORDER TO SHOW CAUSE

To the Department of Homeland Security, Office of the Principal Legal Advisor, through the EOIR Courts and Appeals System (ECAS), which will automatically send service notification to both parties that a new document has been filed.



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Counsel for Respondent