

Non-Detained

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**UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
IMMIGRATION COURT
915 2nd Avenue, Suite 613
Seattle, WA 98174**

_____)	
In the Matter of)	
)	
Mirian Raimundo)	File No. A 221-290-315
Patrick Raimundo Santana)	File No. A 221-290-316
Pablo Henrique Raimundo Santana)	File No. A 221-290-343
)	
In Removal Proceedings)	
)	
_____)	

Immigration Judge: Tisocco, Michael **Next Hearing Date:** July 16, 2027, at 08:30 AM

RESPONDENT'S WRITTEN PLEADINGS

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RESPONDENT’S WRITTEN PLEADINGS

COMES NOW, pursuant to the Immigration Court's Order dated April 22, 2026, Otavio Haverroth Silva, counsel for Rider Respondent Pablo Henrique Raimundo Santana (A-221-290-343), respectfully submits the following Written Pleadings.

1. Respondent Pablo Henrique Raimundo Santana admits proper service of the Notice to Appear (NTA) issued by the Department of Homeland Security, dated October 22, 2024.

2. Counsel has explained to Respondent the following:
 - (a) The rights set forth in **8 C.F.R. § 1240.10(a)**;
 - (b) The consequences of failing to appear in court as set forth in **INA § 240(b)(5)**;
 - (c) The limitation on discretionary relief for failure to appear as set forth in **INA § 240(b)(7)**;
 - (d) The consequences of knowingly filing or making a frivolous application as set forth in **INA § 208(d)(6)**;
 - (e) The requirement to notify the Court within five days of any change of address or telephone number, using **Form EOIR-33/IC**, pursuant to **8 C.F.R. § 1003.15(d)**.

3. The Respondent concedes the charge under INA § 212(a)(7)(A)(i)(I) of the Immigration and Nationality Act (Act), as amended, in that Respondent, at the time of application for admission,

was not in possession of a valid unexpired immigrant visa, reentry permit, border crossing identification card, or other valid entry document required by the Act, and a valid unexpired passport, or other suitable travel document, or document of identity and nationality as required under the regulations issued by the Attorney General under section 211(a) of the Act.

4. The Respondent denies the charge under INA § 212(a)(6)(A)(i) of the Immigration and Nationality Act, as amended, alleging that Respondent is an alien present in the United States without being admitted or paroled, or who has arrived in the United States at any time or place other than as designated by the Attorney General. *See* Exhibit 2.

5. Respondent ADMITS factual allegations (1) through (4) set forth in the Notice to Appear:

- (1) Respondent is not a citizen or national of the United States;
- (2) Respondent is a native and citizen of Brazil;
- (3) Respondent entered the United States at an unknown location on or about October 9, 2024;
- (4) Respondent did not then possess or present a valid immigrant visa, reentry permit, border crossing identification card, or other valid entry document;

6. Respondent DENIES factual allegation (5) set forth in the Notice to Appear:

- (5) Respondent was not then admitted or paroled after inspection by an Immigration Officer.

7. Respondent's denial of the charge under INA § 212(a)(6)(A)(i) and of factual allegation (5) of the Notice to Appear is based on the following: On October 30, 2024, U.S. Immigration and Customs Enforcement granted the Respondent parole pursuant to INA § 212(d)(5)(A), as evidenced by the Interim Notice Authorizing Parole issued by ICE on that date, attached herein as Exhibit 2. Accordingly, Respondent was paroled after inspection by an Immigration Officer and does not fall within the scope of INA § 212(a)(6)(A)(i), which applies only to aliens present in the United States without having been admitted *or* paroled. *See* Exhibit 2.

8. In the event of removal, Respondent declines to designate a country of removal.

9. Respondent intends to apply for the following forms of relief from removal:

- (a) Asylum, Withholding of Removal, and protection under the Convention Against Torture (CAT): a Form I-589 has already been filed and is part of the Respondent's record;
- (d) Any other form of relief for which Respondent may become eligible.

10. Respondent will comply with all biometric and biographical data requirements from DHS. Counsel has advised Respondent that, pursuant to 8 C.F.R. § 1003.47(d), failure to provide biometrics

within the time allowed, absent good cause, will constitute abandonment of the application.

11. Respondent's native language is Brazilian Portuguese. Respondent respectfully requests that a certified interpreter in Brazilian Portuguese be provided for all future hearings.

12. Respondent estimates that the individual merits hearing will require approximately three (3) hours. Respondent respectfully requests that the Court reserve sufficient time for the full presentation of evidence and testimony.

13. Based on the foregoing, counsel respectfully requests that this Honorable Court accept these Written Pleadings.

Respectfully,



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

Exhibit list

Exhibits:

Pages:

Exhibit 1

Pablo Henrique Raimundo Santana's Written
Pleading Declaration with English Translation

1-2

Exhibit 2

Pablo Henrique Raimundo Santana's Notice
Authorizing Parole

3-4

Exhibit 1

RESPONDENT’S PLEADING DECLARATION

I, Pablo Henrique Raimundo Santana (A-Number 221-290-343), declare, under penalty of perjury, that I am a native of Brazil and my native language is Portuguese. I am not fluent in English and cannot fully and adequately understand communication in the language.

I, Pablo Henrique Raimundo Santana, have been advised of my rights in these proceedings by my attorney and representative. I understand those rights. I waive a further explanation of those rights by this court.

I have been advised by my attorney and representative of the consequences of failing to appear for a hearing. I have also been advised by my attorney of the consequences of failing to appear for a scheduled date of departure or deportation. I understand those consequences.

I have been advised by my attorney and representative of the consequences of knowingly filing a frivolous asylum application. I understand those consequences.

I have been advised by my attorney and representative of the consequences of failing to follow the DHS biometrics instructions within the time allowed. I understand those consequences.

I understand that if my mailing address changes, I must notify the court within 5 days of such change by completing an Alien’s Change of Address Form (Form EOIR-33/IC) and filing it with this court.

Finally, my attorney or representative has explained to me what this Written Pleading says. I understand it, I agree with it, and I request that the court accept it as my pleading.

/ SIGNATURE/

Date 05/14/2026

Pablo Henrique Raimundo Santana

I, André Vinicius Inacio Penna Mello, telephone number 415 425-2508, mailing address P.O. Box 90487, San Diego, CA 92169, certify that the professional translation of this document from Portuguese to English has been performed by myself, a qualified translator fluent in both languages, and that the following is an accurate and complete translation of the document.



Date 05/14/2026

ANDRÉ VINICIUS INACIO PENNA MELLO

DECLARAÇÃO DE PLEITOS FINAIS

Eu, Pablo Henrique Raimundo Santana (A-Number 221-290-343), declaro, sob pena de perjúrio, que eu sou nativo do Brasil e o meu idioma nativo é o português. Eu não sou fluente em inglês e não consigo entender a comunicação no idioma de forma ampla e adequada.

Eu, Pablo Henrique Raimundo Santana, fui informado sobre meus direitos neste processo pelo meu advogado e representante. Eu entendo esses direitos. Renuncio a uma explicação adicional desses direitos por este tribunal.

Fui informado pelo meu advogado e representante sobre as consequências de não comparecer a uma audiência. Também fui informado pelo meu advogado sobre as consequências de não comparecer a uma data programada de partida ou deportação. Eu entendo essas consequências.

Fui informado pelo meu advogado e representante sobre as consequências de apresentar conscientemente um pedido de asilo frívolo. Eu entendo essas consequências.

Fui informado pelo meu advogado e representante sobre as consequências de não seguir as instruções biométricas do DHS dentro do prazo permitido. Eu entendo essas consequências.

Entendo que, se meu endereço de correspondência mudar, devo notificar o tribunal dentro de 5 dias após essa mudança, preenchendo um Formulário de Mudança de Endereço de Estrangeiro (Formulário EOIR-33/IC) e apresentando-o a este tribunal.

Finalmente, meu advogado e representante me explicou o que esta Declaração Escrita diz. Eu entendo, concordo e solicito que o tribunal aceite a minha declaração.

Pablo H. Raimundo Santana

Data 14/05/2026

Pablo Raimundo Santana

Exhibit 2

DEPARTMENT OF HOMELAND SECURITY
U.S. Immigration and Customs Enforcement

Date: 10/30/2024

In Reference to: A # 221 290 343

Name: Raimundo-Santana, Pablo Henrique

INTERIM NOTICE AUTHORIZING PAROLE

This letter is to inform you that U.S. Immigration and Customs Enforcement (ICE) has decided to parole you from its custody pursuant to its authority under section 212(d)(5)(A) of the Immigration and Nationality Act. This notice is being issued to you in lieu of Form I-94, *Arrival-Departure Record*, see 8 C.F.R. § 235.1(h)(2), and you should maintain a copy of this letter in your possession at all times.

Your parole authorization is valid for one year beginning from the date on this notice and will automatically terminate upon your departure or removal from the United States or at the end of the one-year period unless ICE provides you with an extension at its discretion. ICE may also terminate parole on notice prior to the automatic termination date. Parole is entirely within the discretion of ICE and can be terminated at any time and for any reason. Your parole is not valid for work authorization and is not an admission in lawful status.

Parole is conditioned on you complying with the terms and conditions of your release. You must notify ICE and the immigration judge of any address correction or address change. You must report for every scheduled hearing before the immigration court and every appointment as directed by ICE (including for removal from the United States should you become subject to a final removal order). You must not violate any local, State or Federal laws or ordinances. You must comply with any other specified conditions if identified separately.

I certify that I received a copy of this notice.

Raimundo-Santana, Pablo Henrique

Alien Name


Alien Signature

10/30/2024

Date

CERTIFICATE OF SERVICE

I certify that on today's date, I served the respondent a copy of this parole notice by the following method (as checked):

In person Other: _____

Alejandro Alvarez

ICE Official Name


ICE Official Signature

10/30/2024

Date

Tarango, Christopher; SDDO

Deciding Official Name


Deciding Official Signature

10/30/2024

Date

Continuation Page for Interim Notice Authorizing Parole

To: Raimundo-Santana, Pablo Henrique
1701 121st St SE, Apt 201, Everett, WA 98208

(425) 552-0914

Date: 10/30/2024
File: A# 221 290 343
Bond: (Parole with Reporting Requirements)

You have been released from service custody pending a final decision in your exclusion/deportation hearing. It is understood that you will be residing at the above address. As stated on the previous page, you are required to notify the Immigration Judge (at the address shown below) of any address correction or address change. When doing so, be sure to include your name and the File Number shown above in your written communication. The attached form, EOIR-33 can be used for this purpose.

Court Address
Office of the Immigration Judge
915 2ND AVE, STE 613, SEATTLE, WA 98174

You must report in person to: 12500 Tukwila International Blvd. Seattle, WA 98168 206-835-4900 +

On: 11/26/24

@ Time: 10:00 am



PHOTO



RIGHT INDEX

Mirian Raimundo
Patrick Raimundo Santana
Pablo Henrique Raimundo Santana

File No. A 221-290-315
File No. A 221-290-316
File No. A 221-290-343

Proof of Service

On this date, I, Otavio Haverroth Silva, served a copy of the following documents:

RESPONDENT'S WRITTEN PLEADINGS

To the following:

Office Location:	Mailing Address:
Office of the Chief Counsel Department of Homeland Security 915 Second Avenue, Suite 708 Seattle, WA 98174	US Immigration and Customs Enforcement US Department of Homeland Security Office of the Chief Counsel 915 Second Avenue, Suite 708 Seattle, WA 98174

by:

- Through the EOIR Courts and Appeals System (ECAS), which will automatically send service notification to both parties that a new document has been filed.



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