

**HS Law Corp.
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Non-Detained

**UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
IMMIGRATION COURT
900 Market Street, Suite 504
Philadelphia, PA 19107**

_____)	
In the Matter of)	
)	
Jose Paixao de Lima)	File No. A. 216-914-874
Arlete Cabral Teixeira)	File No. A. 216-914-875
Andrey Cabral de Lima)	File No. A. 216-914-876
)	
In Removal Proceedings)	
)	
_____)	

Immigration Judge: Fox, Melissa

Next Hearing Date: September 8, 2026 at 8:00 AM.

RESPONDENTS' MOTION FOR SEVERANCE

**UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
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Andrey Cabral de Lima)	File No. A. 216-914-876
)	
In Removal Proceedings)	
_____)	

RESPONDENTS' MOTION FOR SEVERANCE

The undersigned counsel hereby respectfully requests that this Court sever the case of Respondent Andrey Cabral de Lima, from the cases of the other Respondents, pursuant to the Immigration Court Practice Manual, Part II, Chapter 3.20(b), and, in support of this request, states as follows:

Respondents Jose Paixão de Lima, Arlete Cabral Teixeira, and Andrey Cabral de Lima are currently in consolidated removal proceedings, with their hearings being conducted jointly before this Court. Although consolidation may be appropriate when family members present common issues, Andrey's case now involves its own distinct and procedurally independent immigration matter.

Respondent Andrey Cabral de Lima is the beneficiary of a Form I-130, Petition for Alien Relative, currently pending before U.S. Citizenship and Immigration Services (USCIS). *See* Exhibit 1. This family-based petition creates an individualized avenue for relief and calls for independent evidentiary development that does not depend on the merits, evidence, or litigation strategy of his parents' cases. The

adjudication of the Form I-130, as well as any future procedural actions related to that petition, may require deadlines, motions, requests, or hearings specific to Andrey. Those matters may not apply to the proceedings of Jose Paixão de Lima and Arlete Cabral Teixeira.

Andrey anticipates pursuing relief connected to his family-based petition, including the filing of a Form I-601, Application for Waiver of Grounds of Inadmissibility, for which administrative closure may be necessary. If the waiver is approved, termination of removal proceedings may also be necessary to allow him to pursue lawful permanent residence. Maintaining consolidation could therefore delay or complicate the individual handling of Andrey's case, even though his case may proceed on separate grounds and at a different procedural stage.

A separate proceeding will also promote a clearer administrative record. Andrey's case should be evaluated based on his own facts, evidence, family ties, immigration history, and potential forms of relief. Individual adjudication will avoid confusion between distinct requests and will allow this Court to assess his circumstances without commingling his proceedings with matters specific to the other Respondents.

Additionally, severance promotes judicial efficiency and will not prejudice any party. Because Andrey's case may proceed on its own schedule, separation will allow this Court to set deadlines and hearings appropriate to his case, while preserving the clarity of the administrative record without delaying or prejudicing his parents' cases.

Severance is sought because Respondent Andrey Cabral de Lima has a separate, independent, and active pathway to relief, which requires individualized consideration apart from the cases of the other Respondents.

Accordingly, Respondents respectfully request that this Court grant this Motion to Sever and order that the case of Andrey Cabral de Lima (A 216-914-876)

proceed separately from the cases of Jose Paixão de Lima (A 216-914-874) and Arlete Cabral Teixeira (A 216-914-875).

Respectfully,



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

Exhibit list

Exhibits:

Pages:

Exhibit 1

Receipt - I-130, Petition for Alien Relative

1

Exhibit 1

THIS NOTICE DOES NOT GRANT ANY IMMIGRATION STATUS OR BENEFIT.

NOTICE TYPE Receipt		NOTICE DATE April 21, 2026
CASE TYPE I-130, Petition for Alien Relative		USCIS ALIEN NUMBER
RECEIPT NUMBER IOE0936483192	RECEIVED DATE April 16, 2026	PAGE 1 of 1
PRIORITY DATE April 16, 2026	PREFERENCE CLASSIFICATION 201 B INA SPOUSE OF USC	DATE OF BIRTH March 10, 2004

SABRINA M. CARNEIRO
PO BOX 90487
SAN DIEGO, CA 92169

27 00009285

PAYMENT INFORMATION:

Application/Petition Fee: \$675.00
Total Amount Received: \$675.00
Total Balance Due: \$0.00



APPLICANT/PETITIONER NAME AND MAILING ADDRESS

We have received your form and are currently processing the above case for the following beneficiaries:

Name	Date of Birth	Country of Birth	Class (If Applicable)
CABRAL DE LIMA, ANDREY	11/25/2004	BRAZIL	

If this notice contains a priority date, this priority does not reflect earlier retained priority dates. We will notify you separately about any other case you filed.

If we determine you must submit biometrics, we will mail you a biometrics appointment notice with the time and place of your appointment.

If you have questions or need to update your personal information listed above, please visit the USCIS Contact Center webpage at uscis.gov/contactcenter to connect with a live USCIS representative in English or Spanish.

USCIS Office Address:
USCIS
SCOPS TEXAS FACILITY
6046 N Belt Line Rd.
Irving, TX 75038-0001

USCIS Contact Center Number:
(800)375-5283
APPLICANT COPY



Jose Paixao de Lima
Arlete Cabral Teixeira
Andrey Cabral de Lima

File No. A. 216-914-874
File No. A. 216-914-875
File No. A. 216-914-876

Proof of Service

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

RESPONDENTS' MOTION FOR SEVERANCE

To the following:

Office Location:	Mailing Address:
Office of the Principal Legal Advisor Department of Homeland Security 900 Market Street, Suite 346 Philadelphia, PA 19107	US Immigration and Customs Enforcement US Department of Homeland Security Office of the Principal Legal Advisor 900 Market Street, Suite 346 Philadelphia, PA 19107

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.



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Counsel for Respondents