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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	
Joao Lucas Rocha Silveira	**File No. A.220-350-514**
In Removal Proceedings	

Immigration Judge: **Scott, Joseph C.** Next Hearing Date: **January 27, 2027 at 9:00 AM**

RESPONDENT'S MOTION TO CHANGE VENUE

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COMES NOW, Otavio Haverroth Silva, counsel for the above-referenced Respondent, and respectfully moves this Court, pursuant to 8 C.F.R. § 1003.20, to transfer venue of the above-captioned proceedings from the Immigration Court in Philadelphia, Pennsylvania, to the Immigration Court with jurisdiction over Inverness, Florida, and in support thereof states as follows:

Respondent has permanently relocated from Pennsylvania to Florida. Her current address is 2378 S Barton Ave, Inverness, FL 34450; her address of record before this Court was 602 Main Street, Pittsburgh, PA 15202. In compliance with 8 C.F.R. § 1003.15(d), Respondent filed Form EOIR-33 with this Court on June 16, 2026, notifying the Court of her change of address. Respondent is presently residing in Inverness, Florida, and does not intend to return to Pennsylvania.

Requiring Respondent to attend hearings in Philadelphia would impose an undue financial and logistical burden upon her. The distance between Inverness, Florida, and Philadelphia, Pennsylvania, is approximately 1,200 miles, and Respondent lacks the financial means to travel repeatedly across the country for court appearances — including for the Master Hearing currently scheduled for January 27, 2027. Moreover, Respondent is currently

receiving gender-affirming medical care in the Tampa Bay area of Florida, and is the primary caregiver for her U.S. citizen spouse, who also resides in Inverness, Florida. Requiring Respondent to travel to Philadelphia for proceedings would be inconsistent with the efficient and fair administration of justice.

Transferring venue to the Orlando Immigration Court, which has jurisdiction over Inverness, Florida, would facilitate Respondent's access to legal resources and medical care in her community, and ensure that proceedings are conducted in a manner that is practicable for all parties. All relevant evidence, witnesses, and medical providers are located in Florida. No prejudice to the Department of Homeland Security would result from such a transfer, as DHS maintains representation in both jurisdictions.

For the foregoing reasons, Respondent respectfully requests that this Court:

- Grant this Motion to Change Venue;
- Transfer venue of the above-captioned proceedings to the Orlando Immigration Court, with jurisdiction over Inverness, Florida;
- Vacate the Master Hearing currently scheduled for January 27, 2027, at the Philadelphia Immigration Court; and
- Grant such other and further relief as this Court deems just and proper.

Respectfully submitted,



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

João Lucas Rocha Silveira **File No. A 220-350-514**

PROOF OF SERVICE

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

RESPONDENT'S MOTION TO CHANGE VENUE

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.



_____

Otavio Silva (Bar N. 343486)
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P.O. Box 90487
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Counsel for Respondent