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Non-Detained

UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
IMMIGRATION COURT
5245 Pacific Concourse DR #100
Los Angeles, CA 90045

In the Matter of)
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)
Paulo Roberto Prazeres da Rocha) **File No. A. 210-670-060**
)
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In Removal Proceedings)
)

RESPONDENT’S MOTION TO CONTINUE

The undersigned counsel hereby respectfully requests a continuance of the upcoming Master Hearing currently scheduled for June 23, 2026, and in support states the following:

1. The undersigned counsel has only recently been retained to represent the Respondent in these proceedings. A Notice of Entry of Appearance as Attorney or Representative (Form EOIR-28) is being filed concurrently with this Motion.
2. The Respondent, Paulo Roberto Prazeres da Rocha, is a native and citizen of Brazil who last entered the United States on April 16, 2025, through Miami, Florida, as a nonimmigrant visitor. The Respondent was subsequently placed in removal proceedings following the denial of his Form I-539, Application to Extend/Change Nonimmigrant Status, on March 19, 2026, and the issuance of a Notice to Appear.

3. The Master Calendar Hearing is presently scheduled for June 23, 2026, less than two weeks from the date of this filing. This extremely compressed timeline does not afford undersigned counsel a meaningful opportunity to review the complete record or adequately advise the Respondent as to his rights and options before the Immigration Court.
4. Furthermore, the Respondent's prior I-539 proceedings involved the submission of a Response to a Request for Evidence prepared with an external paralegal. Undersigned counsel has not yet had the opportunity to review the contents of that submission and assess its legal implications in the context of the current removal proceedings. A thorough review of that record is essential to ensure that the Respondent's interests are properly protected going forward.
5. Additionally, the Respondent was legally married to Claire Elizabeth Lombrozo, a United States citizen by birth, on February 25, 2026. As a result, the Respondent may be eligible for adjustment of status pursuant to INA § 245 based on an immediate relative petition. Undersigned counsel requires additional time to evaluate this potential form of relief and determine the most appropriate legal strategy for the Respondent's defense before the Immigration Court.
6. In order to provide effective representation, undersigned counsel needs additional time to consult with the Respondent, request and review all relevant case materials and records, gather supporting documentation, and determine the appropriate legal strategy moving forward, including but not limited to evaluating all available forms of relief.

Additional time will ensure that all filings and supporting evidence are submitted in a thorough and accurate manner, thereby promoting fairness and due process in these proceedings. This Motion is filed in good faith and not for the purpose of delay.

Pursuant to 8 C.F.R. § 1003.29, an immigration judge may grant a motion for continuance for good cause shown. Good cause exists here based on the respondent's recent entry into removal proceedings, the insufficient time between the issuance of the Notice to Appear and the scheduled Master Calendar Hearing, the need to review the prior

proceedings and submission conducted without the supervision of a licensed attorney, and the need to evaluate the Respondent's eligibility for adjustment of status as the immediate relative of a United States citizen.

WHEREFORE, the Respondent respectfully requests that this Honorable Court grant a continuance of the Master Calendar Hearing to allow undersigned counsel sufficient time to prepare and effectively represent the Respondent in these proceedings.

Respectfully,



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

Proof of Service

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

RESPONDENT’S MOTION TO CONTINUE

To the following:

<p>Office Location:</p> <p>Office of the Principal Legal Advisor Department of Homeland Security 606 South Olive Street, 8th Floor Los Angeles, CA 90014</p>	<p>Mailing Address:</p> <p>US Immigration and Customs Enforcement US Department of Homeland Security 606 South Olive Street, 8th Floor Los Angeles, CA 90014</p>
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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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