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

Immigration Judge: Callaghan, Diana **Next Hearing Date:** June 23, 2026 at 8:00 AM.

RESPONDENT'S MOTION TO CONTINUE

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In the Matter of	)	
Paulo Roberto Prazeres da Rocha	)	**File No. A. 210-670-060**
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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 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, develop a comprehensive legal strategy, and adequately prepare the Respondent for proceedings before the Immigration Court.
3. Furthermore, this case involves a complex record that extends beyond the Immigration Court. Counsel has not yet had the opportunity to access and thoroughly review the

complete case record. Such review is essential to ensure that the Respondent's interests are properly protected going forward.

4. 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.
5. 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 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
San Diego, CA 92169
Counsel for Respondent

Paulo Roberto Prazeres da Rocha **File No. A. 210-670-060**

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:

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

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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Counsel for Respondent