

Non-Detained

880 Front Street, Suite 4240
San Diego, CA 92101

File No. A. 210-670-359

RESPONDENT'S MOTION TO CONTINUE

**UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
IMMIGRATION COURT
880 Front Street, Suite 4240
San Diego, CA 92101**

In the Matter of

Lucas Santos da Silva

In Removal Proceedings

File No. A. 210-670-359

RESPONDENT’S MOTION TO CONTINUE

The undersigned counsel hereby respectfully requests a continuance of the upcoming Master Hearing currently scheduled for September 1st, 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 September 1st, 2026, within only a week 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. The Respondent has a T-Visa application (Form I-914) currently pending before the United States Citizenship and Immigration Services (USCIS), as evidenced by the Receipt Notice attached hereto as Exhibit 1.
4. Undersigned counsel was not involved in the T-Visa proceedings before USCIS and has not yet had the opportunity to obtain and review the complete case record, and such review is essential to ensure that the Respondent's interests are properly protected going forward.

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 need to review external proceedings, and the need to evaluate the Respondent's potential forms of relief.

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

Exhibit list

Exhibits:

Pages:

**Exhibit 1 - Proof of Pending Application for T
Nonimmigrant Status**

Receipt Notice for Form I-914

1-2

Exhibit 1 - Proof of Pending Application for T Nonimmigrant Status

THIS NOTICE DOES NOT GRANT ANY IMMIGRATION STATUS OR BENEFIT.



Receipt Number LIN2625250971		Case Type I914 - APPLICATION FOR T NONIMMIGRANT STATUS
Received Date 06/15/2026	Priority Date	Applicant A210 670 359 SANTOS DA SILVA, LUCAS
Notice Date 06/17/2026	Page 1 of 2	Beneficiary A210 670 359 SANTOS DA SILVA, LUCAS

LUCAS SANTOS DA SILVA
7575 KINGSPPOINT PKWY STE 4
ORLANDO FL 32819

Notice Type: Receipt Notice
Fee Waived

We have received the application or petition ("your case") listed above. This notice only shows that your case was filed on the "Received Date" listed above. It does NOT grant you any immigration status or immigration benefit, and it is not evidence that your case is still pending. We will notify you in writing when we make a decision on your case or if we need additional information.

Please save this and any other notices about your case for your records. You should also keep copies of anything you send us, as well as proof of delivery. Have these records available when you contact us about your case.

Contacting the Agency

If your safe mailing address changes and you do not have an attorney of record or representative on your case you must submit your address change in writing, with your signature, to the center with jurisdiction over your filing. Otherwise, you might not receive notice of your action on this case. If any other changes need to be made you also must contact the center with jurisdiction over your filing in writing. Please include what changes need to be made and your signature.

If any of the information in your notice is incorrect or you have questions about your case, you can reach USCIS at www.uscis.gov/contact, utilizing the available case inquiry options for "Inquiries for VAWA, T, and U Filings."

SCOPS TEXAS FACILITY
U.S. Citizenship & Immigration Services
6046 N BELT LINE RD.
IRVING, TX 75038-0001

Processing time - Processing times vary by case type. Go to www.uscis.gov to see the current processing times listed by case type and office.

- View your case status on our website's Case Status Online page.
- You can also sign up to receive free email updates as we process your case.
- During most of the time while your case is pending, the processing status will not change. This is because we are working on cases that were filed before your case.
- When we make a decision on your case or if we need something from you, we will notify you by mail and update our systems.
- If you do not receive an initial decision or update from us within our current processing time, visit our website at www.uscis.gov for options for submitting an inquiry.

Biometrics - We require biometrics (fingerprints, a photo, and a signature) for some types of cases. If we need biometrics from you, we will send you a SEPARATE appointment notice with a specific date, time and place for you to go to a USCIS Application Support Center (ASC) for biometrics processing. You must wait for that separate appointment notice and take it (NOT this receipt notice) to your ASC appointment along with your photo identification.

Acceptable kinds of photo identification are:

- A passport or national photo ID issued by your country,
- A driver's license,
- A military photo ID, or
- A state-issued photo ID card.

If you receive more than one ASC appointment notice (even for different cases), take them both to the first appointment date.

Return of Original Documents - Use Form G-884, Request for the Return of Original Documents, to request the return of original documents submitted to establish eligibility for an immigration or citizenship benefit. You only need to submit one Form G-884 if you are requesting multiple documents contained in a single USCIS file. However, if the requested documentation is in more than one USCIS file, you must submit a separate request for each file. (For example: If you wish to obtain your mother's birth certificate and your mother's/father's marriage certificate, both of which are in the USCIS file that pertains to her, submit one Form G-884 with your mother's information.)

Please see the additional information on the back. You will be notified separately about any other cases you filed.

USCIS encourages you to sign up for a USCIS online account. To learn more about creating an account and the benefits, go to <https://www.uscis.gov/file-online>.

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U.S. CITIZENSHIP & IMMIGRATION SVC
6046 N BELT LINE RD.
IRVING TX 75038-0001

USCIS Contact Center: www.uscis.gov/contactcenter



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NOTICE: The information you provide on and in support of applications and petitions is submitted under the penalty of perjury. USCIS and the U.S. Department of Homeland Security reserve the right to verify this information before and/or after making a decision on your case so we can ensure that you have complied with applicable laws, rules, regulations, and other legal authorities. We may review public information and records, contact others by mail, the internet or phone, conduct site inspections of businesses and residences, or use other methods of verification. We will use the information obtained to determine whether you are eligible for the benefit you seek. If we find any derogatory information, we will follow the law in determining whether to provide you (and the legal representative listed on your Form G-28, if you submitted one) an opportunity to address that information before we make a formal decision on your case or start proceedings.

Please see the additional information on the back. You will be notified separately about any other cases you filed.

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IRVING TX 75038-0001

USCIS Contact Center: www.uscis.gov/contactcenter



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 880 Front Street, Room 2246 San Diego, CA 92101	US Immigration and Customs Enforcement US Department of Homeland Security Office of the Principal Legal Advisor 880 Front Street, Room 2246 San Diego, CA 92101

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