



**UNITED STATES DEPARTMENT OF JUSTICE  
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW  
IMMIGRATION COURT  
150 Apollo Drive, Suite 100  
Chelmsford, MA 01824**

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<b>In the Matter of</b>	)	
	)	
<b>Vlademiro Manuel Chibuca Massiala</b>	)	<b>File No. A.243-093-631</b>
	)	
<b>In Removal Proceedings</b>	)	
	)	
_____	)	

**RESPONDENT’S MOTION TO CHANGE VENUE**

**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 Chelmsford, Massachusetts, to the Immigration Court with jurisdiction over Newburgh, New York, and in support thereof states as follows:

The Respondent has permanently relocated from Maine to New York. His current address is 73 Liberty Street, Apt #3, Newburgh, New York, 12550; his former address was 5 Nimitz DR, Unit 301, Brunswick, Maine, 04011. In compliance with 8 C.F.R. § 1003.15(d), Respondent timely filed Form EOIR-33/IC with this Court on May 25, 2026, notifying the Court of his change of address. The Respondent is presently residing in Newburgh, New York, and does not intend to return to Maine.

An Immigration Judge may change venue “for good cause” upon motion by one of the parties. 8 C.F.R. § 1003.20(b). Good cause is determined by balancing relevant factors including administrative convenience, expeditious treatment of the case, and factors commonly associated with the alien’s place of residence. Matter of Rahman, 20 I&N Dec. 480 (BIA 1992). The present case satisfies this standard.

First, maintaining venue in Chelmsford, MA creates a structural misalignment between the court of record and the DHS office geographically responsible for the Respondent's current location, a factor of administrative convenience that weighs directly in favor of transfer. Transferring venue to the New York (Broadway) Immigration Court restores that structural alignment and ensures that both the Court and the responsible DHS office operate within the same geographic jurisdiction.

Furthermore, the geographic and financial burden of maintaining venue in Chelmsford, MA is substantial and disproportionate. The distance between Respondent's current address in Newburgh, New York and the Chelmsford Immigration Court is approximately 200 miles. By contrast, the New York (Broadway) Immigration Court is located approximately 65 miles from Newburgh, meaning the distance to the current venue is more than three times greater than the distance to the proposed transferee court. The Respondent has limited financial resources and lacks the means to bear the recurring costs of travel across state lines for court appearances.

No individual hearing has yet been scheduled in this case, which means a change of venue at this stage would cause no disruption to any pending court date or to the orderly progress of the proceedings. Transfer at this juncture is thus administratively efficient and represents the least disruptive point at which to align the venue with the Respondent's actual place of residence.

For all the foregoing reasons, good cause has been established for the requested change of venue pursuant to 8 C.F.R. § 1003.20(b), and Respondent respectfully submits that the interests of justice, administrative efficiency, and fundamental fairness all weigh in favor of granting this motion.

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

- a) Grant this Motion to Change Venue;
- b) Transfer venue of the above-captioned proceedings to the New York (Broadway) Immigration Court, with jurisdiction over Newburgh, New York; and
- c) 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*

**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:

<b>Office Location:</b>	<b>Mailing Address:</b>
Office of the Principal Legal Advisor Department of Homeland Security JFK Federal Building 15 New Sudbury Street, Room 425 Boston, MA 02203	US Immigration and Customs Enforcement US Department of Homeland Security JFK Federal Building 15 New Sudbury Street, Room 425 Boston, MA 02203

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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**Otavio Silva (Bar N. 343486)**  
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*Counsel for Respondent*