

Non-Detained

**HS Law Corp.
Otavio Haverroth Silva, SBN#343486
P.O. Box 90487
San Diego, CA 92169
(510) 241-9336**

**UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
IMMIGRATION COURT
900 Market Street, Suite 504
Philadelphia, PA 19107**

	)	
In the Matter of	)	
	)	
Jose Paixao de Lima	)	File No. A 216-914-874
Arlate Cabral Teixeira	)	File No. A 216-914-875
	)	
In Removal Proceedings	)	
	)	
	)	

Immigration Judge: Fox, Melissa

Next Hearing Date: September 8, 2026, at 8:00 AM.

MOTION TO WITHDRAW AS COUNSEL

**UNITED STATES DEPARTMENT OF JUSTICE
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	)	
	)	

MOTION TO WITHDRAW AS COUNSEL

COMES NOW, Otavio Haverroth Silva, Esq., attorney of record for the Respondents, and respectfully requests leave of this Honorable Court to withdraw as counsel of record pursuant to 8 C.F.R. § 1003.17(a)(3) and EOIR Policy Manual, Part I, Chapter 5.4(b)(1) (Changes in Representation, Withdrawal of Practitioner, Before the immigration court). In support thereof, and consistent with the standards set forth in *Matter of Rosales*, 19 I&N Dec. 655 (BIA 1988), the undersigned counsel states as follows:

1. Respondents José Paixão de Lima, under A-Number 216-914-874, and Arlete Cabral Teixeira, under A-Number 216-914-875, are natives and citizens of Brazil and are currently in removal proceedings before the Philadelphia Immigration Court. Respondents retained Otavio Haverroth Silva, Esq., of HS Law Corp., to represent them in all immigration proceedings other than custody and bond proceedings. José Paixão de Lima's last known address is Rua Antonio José, Centro, Ouro Branco, AL 57525-000, Brazil, and Arlete Cabral Teixeira's last known address is 3225 Unruh Ave, Philadelphia, PA 19149, United States.
2. The procedural posture of these cases is as follows. Respondents remain in removal proceedings before the Philadelphia Immigration Court. Their next scheduled hearing is a Master Calendar Hearing set for September 8, 2026, at 8:00 AM, to be conducted via video conference (Webex). There are no pending filing deadlines occurring before the

next scheduled hearing. Respondents have been advised of their right to seek and retain new counsel and will have an opportunity to do so prior to the hearing. *See* Exhibit 1 and 2.

3. Due to a conflict of interest, undersigned counsel and Respondents mutually agreed to terminate the attorney-client relationship, and Respondents expressly consented to counsel's withdrawal from their removal proceedings. *See* Exhibit 1.
4. On August 14, 2026, Respondents signed a Mutual Termination Agreement, confirming their agreement to the termination of the legal representation. *See* Exhibit 1.
5. On August 20, 2026, undersigned counsel formally notified Respondents by mail of counsel's request to withdraw from representation and provided them with a complete copy of their electronic Records of Proceeding (eROP). *See* Exhibit 2.
6. Respondents were informed that their next Master Calendar Hearing is scheduled for September 8, 2026, at 8:00 AM, before the Philadelphia Immigration Court, via video conference (Webex), and that they remain obligated to appear unless otherwise ordered by this Court. Furthermore, the Respondent was advised to obtain new counsel and was informed of the importance of appearing at all scheduled hearings, keeping the Immigration Court apprised of any changes of address, and complying with all applicable deadlines in order to avoid the risk of an *in absentia* removal order. *See* Exhibits 1 and 2.
7. For the reasons set forth above, good cause has been established for granting this Motion. Respondents expressly consented to counsel's withdrawal; they received actual notice of the date, time, and manner of their next hearing and of their obligation to appear; there are currently no pending filing deadlines occurring before the hearing; they were informed of their right to retain new counsel; the Government will suffer no prejudice as a result of the withdrawal; and continued representation would present a conflict with undersigned counsel's professional obligations.
8. Therefore, undersigned counsel respectfully requests permission to withdraw from all proceedings regarding Respondents' cases.
9. A copy of this motion was served to the Respondents by mail. *See* Exhibit 2.

WHEREFORE, undersigned counsel respectfully requests that this Honorable Court grant this Motion and permit Otavio Haverroth Silva, Esq. to withdraw as counsel of record for Respondents José Paixão de Lima (A 216-914-874) and Arlete Cabral Teixeira (A 216-914-875).

Respectfully submitted,



Otavio Haverroth Silva (Bar N.343486)

Attorney at Law

P.O. Box 90487, San Diego, CA 92169

(510) 241-9336

Counsel for Respondents

Exhibit list

Exhibits:

Pages:

Exhibit 1

Mutual Termination Agreement

1-4

Exhibit 2

Letter Serving Motion to Withdraw as Counsel

5-8

Mail Receipt for Letter Notifying Respondents of
Withdraw as Counsel

Exhibit 1

JOINT DECLARATION REGARDING TERMINATION OF REPRESENTATION

We, **JOSÉ PAIXÃO DE LIMA**, Alien Registration Number A# 216-914-874, and **ARLETE CABRAL TEIXEIRA**, Alien Registration Number A# 216-914-875, jointly declare as follows:

1. By mutual agreement with Otávio Haverroth Silva, Esq., of HS Law Corp., our attorney of record before the Immigration Court, we have decided to terminate his legal representation in our current removal proceedings and no longer wish for such representation to continue.
2. We expressly consent to the attorney filing the necessary request with the Immigration Court to formally withdraw as attorney of record in our proceedings.
3. We have been expressly informed of the current status of our cases and of the procedural obligations that remain in effect regardless of the termination of representation.
4. We understand that a **Master Calendar Hearing** remains currently scheduled before the Philadelphia Immigration Court in Pennsylvania for **September 8, 2026, at 8:00 AM**, before the Honorable Immigration Judge Melissa Fox, to be conducted as an internet-based hearing (Webex), accessible at: <https://eoir.webex.com/meet/IJ.Fox>.
5. We have been informed that we must appear at the hearing identified above unless the Immigration Court subsequently issues an order canceling or rescheduling the hearing. We also understand that failure to appear may result in the issuance of an order of removal in our absence (*in absentia*).
6. We have also been informed that we have the right to seek and retain another attorney or legal representative to assist us in our proceedings before the Immigration Court, should we so choose, and we have had the opportunity to ask questions regarding the termination of representation and the current status of our cases.
7. By signing this declaration, we confirm our agreement to the termination of the legal representation of Otávio Haverroth Silva, Esq., and authorize this document to be submitted to the Immigration Court as evidence of our consent to his withdrawal as attorney of record in our proceedings.

Acknowledged and agreed,

/SIGNATURE/

JOSÉ PAIXÃO DE LIMA

/SIGNATURE/

ARLETE CABRAL TEIXEIRA

Date: August 14, 2026.

I, André Vinicius Inacio Penna Mello, telephone number 415 425-2508, mailing address P.O. Box 90487, San Diego, CA 92169, certify that the professional translation of this document from Portuguese to English has been performed by myself, a qualified translator fluent in both languages, and that the following is an accurate and complete translation of the document.



ANDRÉ VINICIUS INACIO PENNA MELLO

Date: August 18, 2026.

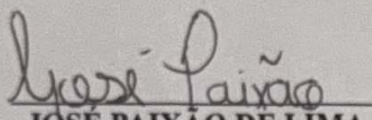
DECLARAÇÃO CONJUNTA DE ENCERRAMENTO DA REPRESENTAÇÃO

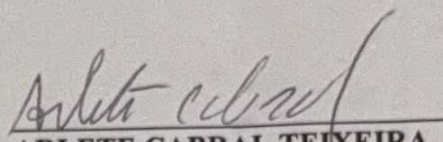
Nós, **JOSÉ PAIXÃO DE LIMA**, número de registro estrangeiro A# 216-914-874, e **ARLETE CABRAL TEIXEIRA**, número de registro estrangeiro A# 216-914-875, declaramos conjuntamente o seguinte:

1. Em comum acordo com Otávio Haverroth Silva, Esq., da HS Law Corp., nosso advogado constituído perante a Corte de Imigração, decidimos pelo encerramento de sua representação legal em nossos atuais processos de remoção, não tendo mais interesse em sua continuidade.
2. Consentimos expressamente que o advogado apresente perante a Corte de Imigração o pedido necessário para formalizar sua retirada como advogado de registro em nossos processos.
3. Fomos expressamente informados sobre a situação atual de nossos casos e sobre as obrigações processuais que permanecem vigentes independentemente do encerramento da representação.
4. Estamos cientes de que permanece atualmente agendada, perante o Tribunal de Imigração de Filadélfia, Pensilvânia, a **audiência Master** designada para o dia **8 de setembro de 2026, às 8:00 AM**, a ser conduzida pela Juíza de Imigração Hon. Melissa Fox, na modalidade de audiência por internet (Webex), cujo link de acesso é: <https://eoir.webex.com/meet/IJ.Fox>.
5. Fomos informados de que devemos comparecer à audiência acima indicada, salvo se a Corte de Imigração emitir ordem posterior cancelando ou remarcando a audiência. Estamos também cientes de que o não comparecimento poderá resultar na emissão de uma ordem de remoção em nossa ausência (*in absentia*).
6. Fomos igualmente informados de que temos o direito de procurar e contratar outro advogado ou representante legal para nos auxiliar em nossos processos perante a Corte de Imigração, caso assim desejemos, e tivemos oportunidade de esclarecer dúvidas sobre o encerramento da representação e sobre a situação atual de nossos casos.

7. Ao assinarmos esta declaração, confirmamos nossa concordância com o encerramento da representação legal de Otávio Haverroth Silva, Esq., e autorizamos que este documento seja apresentado perante a Corte de Imigração como comprovação de nosso consentimento com sua retirada como advogado de registro em nossos processos.

Consciente e de acordo,


JOSE PAIXÃO DE LIMA


ARLETE CABRAL TEIXEIRA

Data: 14 de agosto de 2026.

Exhibit 2

August 20, 2026
José Paixão de Lima and Arlete Cabral Teixeira
3225 Unruh Ave
Philadelphia, PA 19149
United States

Dear Mr. José Paixão de Lima and Ms. Arlete Cabral Teixeira,

I hope this letter finds you well.

As previously discussed and formalized in the Mutual Termination Agreement, signed by both of you on August 14, 2026, enclosed please find a copy of the *Motion to Withdraw as Counsel*, through which we are requesting that the Immigration Court formally approve the termination of our representation in your removal proceedings.

We reiterate that your next **Master Calendar Hearing** is scheduled for **September 8, 2026, at 8:00 AM.**, before the Philadelphia Immigration Court, and will be conducted **via video conference (Webex)**.

It is important that you appear at all scheduled hearings, including the hearing identified above, on the date and at the time specified and through the access link provided, unless the Immigration Court expressly orders otherwise. Failure to appear at a scheduled hearing may result in the issuance of an order of removal *in absentia*.

You must also keep the Immigration Court properly informed of any change of address by promptly notifying the Court of any such change. It is equally important that you comply with all applicable deadlines, Court orders, and other procedural obligations related to your cases.

As of the date of this letter, there are no pending filing deadlines before your next scheduled hearing. However, all other procedural obligations remain in effect, and the Court may establish additional deadlines or requirements as your proceedings continue.

We recommend that you seek and retain new counsel as soon as possible so that you may have legal assistance with the continued handling of your proceedings before the Immigration Court.

Also enclosed with this letter is a **complete copy of your electronic Records of Proceeding (eROP)**.

We remain available to provide any additional information related to the termination of our representation and the documents provided, if necessary.

Thank you for your understanding, and we wish you success in the next stages of your proceedings.

Sincerely,



Otavio Haverroth Silva

Attorney, SBN #343486
YOU SA Law Firm
P.O. Box 90487
San Diego, CA 92169

I, André Vinicius Inacio Penna Mello, telephone number 415 425-2508, mailing address P.O. Box 90487, San Diego, CA 92169, certify that the professional translation of this document from Portuguese to English has been performed by myself, a qualified translator fluent in both languages, and that the following is an accurate and complete translation of the document.



ANDRÉ VINICIUS INACIO PENNA MELLO

Date: August 20, 2026.

20 de agosto de 2026
José Paixão de Lima e Arlete Cabral Teixeira
3225 Unruh Ave
Philadelphia, PA 19149
United States

Prezados Sr. José Paixão de Lima e Sra. Arlete Cabral Teixeira,

Espero que esta carta os encontre bem.

Conforme previamente conversado e formalizado na Declaração Conjunta de Encerramento da Representação, assinada por ambos em 14 de agosto de 2026, encaminho, por meio desta, cópia da *Motion to Withdraw as Counsel*, por meio da qual solicitamos à Corte de Imigração a formalização do encerramento da nossa representação em seus processos de remoção.

Reforçamos que a próxima **Master Calendar Hearing** está agendada para o dia **8 de setembro de 2026, às 8:00 AM**, perante a Corte de Imigração da Filadélfia, e será realizada por **videoconferência (Webex)**.

É importante que os senhores compareçam a todas as audiências agendadas, inclusive à audiência acima indicada, na data e horário determinados e por meio do link de acesso disponibilizado, salvo se a Corte de Imigração determinar expressamente o contrário. A ausência a uma audiência poderá resultar na emissão de uma ordem de remoção em sua ausência (*in absentia*).

Os senhores também deverão manter a Corte de Imigração devidamente informada sobre qualquer alteração de endereço, notificando prontamente a Corte sempre que houver qualquer mudança. É igualmente importante observar e cumprir todos os prazos, determinações e demais obrigações processuais aplicáveis ao caso.

Até a presente data, não há prazos de protocolo pendentes antes da próxima audiência agendada. No entanto, todas as demais obrigações processuais permanecem em vigor, e novos prazos ou determinações poderão ser estabelecidos pela Corte no decorrer dos processos.

Recomendamos que os senhores busquem e contratem um novo advogado o quanto antes, para que possam contar com assistência jurídica na continuidade de seus processos perante a Corte de Imigração.

Junto a esta carta, encaminhamos também uma **cópia integral de seus processos eletrônicos (eROP)**.

Permanecemos disponíveis para fornecer informações adicionais relacionadas ao encerramento da representação e ao conteúdo dos documentos encaminhados, se necessário.

Agradecemos pela compreensão e desejamos sucesso nas próximas etapas.

Atenciosamente,



Otavio Haverroth Silva

Advogado SBN#343486

YOU SA Law Firm

P.O. Box 90487

San Diego, CA 92169

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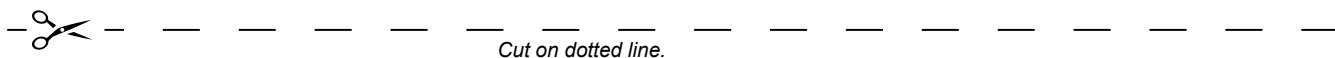
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Motion to
Withdraw as Counsel



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OTAVIO H SILVA
PO BOX 90487
SAN DIEGO CA 92169-2487

To: ARLETE CABRAL TEIXEIRA
JOSE PAIXAO DE LIMA
3225 UNRUH AVE
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Jose Paixao de Lima
Arlete Cabral Teixeira

File No. A 216-914-874
File No. A 216-914-875

Proof of Service

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

MOTION TO WITHDRAW AS COUNSEL

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 Haverroth Silva (Bar N.343486)
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P.O. Box 90487, San Diego, CA 92169
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Counsel for Respondents