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Non-Detained

UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
IMMIGRATION COURT
1855 Gateway Blvd., Suite 850
Concord, CA 94520

_____	)	
In the Matter of	)	
	)	
	)	
Humberto Garcez	)	File No. A. 208-639-150
Christiana Fabricio de Naronha	)	File No. A. 208-639-151
	)	
In Removal Proceedings	)	
	)	
_____	)	

Immigration Judge: Stender, Jacob J.

Next Hearing Date: August 25, 2026 at 1:30 p.m.

RESPONDENTS' MOTION TO CONTINUE

1855 Gateway Blvd., Suite 850
Concord, CA 94520

File No. A. 208-639-151

1. The undersigned counsel has only recently been retained to represent the Respondents in these proceedings. The Notices of Entry of Appearance as Attorney or Representative (Form EOIR-28) are being filed concurrently with this Motion.
2. The Master Calendar Hearing is presently scheduled for August 25, 2026, less than four weeks from the date of this filing. This compressed timeline does not afford undersigned counsel a meaningful opportunity to review the complete record, develop a comprehensive legal strategy, and adequately prepare the Respondents for proceedings before the Immigration Court.
3. Furthermore, this case involves a complex record that extends beyond the Immigration Court. Prior to the issuance of the Notice to Appear, the Respondents had filed an affirmative asylum application with the United States Citizenship and Immigration

Services (USCIS). Following a USCIS asylum interview, the Respondents received a referral notice and were subsequently placed in removal proceedings before this Court. The Notices to Appear were issued on June 11, 2026, and undersigned counsel was only recently retained to represent the Respondents in these proceedings. Undersigned counsel was not involved in the prior affirmative asylum proceedings and has not yet had the opportunity to obtain and thoroughly review the complete case record, including all materials from the prior USCIS proceedings.

4. In order to provide effective representation, undersigned counsel needs additional time to consult with the Respondents, 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 Respondents' recent entry into removal proceedings, the need to obtain and review the complete record from the prior affirmative asylum proceedings before USCIS, the limited time between the issuance of the Notice to Appear and the scheduled Master Calendar Hearing, and the need to evaluate all available forms of relief.

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

Respectfully,



Otavio Silva (Bar N. 343486)
Attorney at Law
P.O. Box 90487
San Diego, CA 92169
Counsel for Respondents

Humberto Garcez
Christiana Fabricio de Naronha

File No. A. 208-639-150
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Proof of Service

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

RESPONDENTS' MOTION TO CONTINUE

To the following:

Office Location:	Mailing Address:
Office of the Principal Legal Advisor Department of Homeland Security 100 Montgomery Street, Suite 200 San Francisco, CA 94104	US Immigration and Customs Enforcement US Department of Homeland Security Office of the Principal Legal Advisor P.O. Box 26449 San Francisco, CA 94126-644

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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