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Non-Detained

UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
IMMIGRATION COURT
500 N. Orange Avenue Ste. 1100
Orlando, FL 32801

In the Matter of)
)
Carla Alexandra Oliveira) **File No. A. 214-863-557**
)
)
In Removal Proceedings)

Immigration Judge: Harris, Rodger C.

Next Hearing Date: June 23, 2026 at 1:00 PM.

RESPONDENT'S MOTION TO CONTINUE

**UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
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500 N. Orange Avenue Ste. 1100
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In the Matter of

Carla Alexandra Oliveira

In Removal Proceedings

File No. A. 214-863-557

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 (Form EOIR-28) is being filed concurrently with this Motion.

2. Prior to the undersigned counsel's involvement, the Respondent was unrepresented in this matter. Counsel has not yet had an opportunity to obtain and review the full Record of Proceedings or any documents submitted in this case.

3. Additionally, Respondent previously filed Form I-589, Application for Asylum and for Withholding of Removal, with USCIS through prior counsel. On August 12, 2025, USCIS referred the application to the Immigration Court, thereby placing Respondent in removal proceedings. Respondent's first Master Calendar Hearing was originally scheduled for August 11, 2026, but was recently rescheduled to June 23, 2026. Respondent has reported serious concerns regarding prior counsel's handling of her case, including lack of communication, failure to provide case updates, and failure to provide her with the underlying case file. Accordingly, given the referral to Immigration Court, the fact that this case involves records and proceedings before USCIS, the need to obtain and review the underlying filings and records, and undersigned counsel's recent entry into the case, this

matter presents factual and procedural complexity warranting additional time for counsel to adequately review the record and evaluate all potential forms of relief.

4. In order to provide effective representation, undersigned counsel needs additional time to consult with Respondent, request and review the relevant case materials, gather supporting documentation, and determine the appropriate legal strategy moving forward.

5. Additional time will ensure that any applications or 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 purposes of delay.

We rely on 8 C.F.R. § 1003.29, which provides that a continuance may be granted for good cause shown. In light of the above facts and circumstances, we believe that the reasons outlined above constitute good cause for granting our motion for continuance.

Wherefore, Respondent respectfully requests that this Honorable Court grant a continuance of the Master Hearing to allow 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

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:

<p>Office Location:</p> <p>Office of the Principal Legal Advisor 500 North Orange Avenue Suite 5000 Orlando, FL 32801</p>	<p>Mailing Address:</p> <p>US Immigration and Customs Enforcement US Department of Homeland Security Office of the Principal Legal Advisor 500 North Orange Avenue Suite 5000 Orlando, FL 32801</p>
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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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Counsel for Respondent