

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

**Non-Detained**

**UNITED STATES DEPARTMENT OF JUSTICE**  
**EXECUTIVE OFFICE FOR IMMIGRATION REVIEW**  
**IMMIGRATION COURT**  
915 2nd Avenue, Suite 613  
Seattle, WA 98174

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**In the Matter of** )  
 )  
**Cirley Cristina Affonso de Souza** ) **File No. A. 226-089-051**  
 )  
**In Removal Proceedings** )  
 )  

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Immigration Judge: **Mcseveney, Robert B.C.** Next Hearing Date: **January 31, 2028 at 8:30 am.**

**MOTION TO WITHDRAW AS COUNSEL**

**UNITED STATES DEPARTMENT OF JUSTICE  
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW  
IMMIGRATION COURT  
915 2nd Avenue, Suite 613  
Seattle, WA 98174**

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<b>In the Matter of</b>	)	
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	)	
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	)	
	)	

**MOTION TO WITHDRAW AS COUNSEL**

**COMES NOW**, Otavio Haverroth Silva, Esq., attorney of record for the Respondent, and respectfully requests leave of this Honorable Court to withdraw as counsel of record pursuant to 8 C.F.R. § 1003.17(b) and EOIR Policy Manual, Part I, Chapter 5.4 (Changes in Representation). 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. The Respondent, Cirley Cristina Affonso de Souza, is a native and citizen of Brazil currently in removal proceedings before the Seattle Immigration Court. Respondent retained Otavio Haverroth Silva, Esq. of HS Law Corp to represent her in all immigration proceedings other than custody and bond proceedings. The Respondent’s last known address is 16221 North Rd, Apt T3, Lynnwood, WA 98087.
2. The procedural posture of this case is as follows. Respondent remains in removal proceedings before the Seattle Immigration Court. The next scheduled hearing is a Master Calendar Hearing set for January 31, 2028, at 8:30 AM, before Immigration Judge Mcseveney, Robert B.C.. There is no Individual Hearing date and no imminent briefing deadline. Counsel previously filed Form I-589 (Application for Asylum and for Withholding

of Removal, including a request for protection under the Convention Against Torture), a Pre-Hearing Order response, and supporting evidence. The Employment Authorization application (Form I-765) was approved. The substantial time remaining before the next hearing ensures that Respondent will have a full and adequate opportunity to secure new counsel without any procedural prejudice to her case.

3. Good cause exists for withdrawal based on a total and irreparable breakdown of the attorney-client relationship. Despite repeated attempts to contact the Respondent by telephone and text message over the course of several months, counsel was unable to establish communication.

4. On April 23, 2026, undersigned counsel formally notified the Respondent by electronic mail of the termination of legal representation, transmitting a complete copy of the Respondent's case file (eROP) and the Final Letter of Termination, and expressly urging her to retain new counsel. *See Exhibit 1*

5. On April 24, 2026, the written Final Letter of Termination was additionally sent via USPS Priority Mail to the Respondent's last known address at 16221 North Rd, Apt T3, Lynnwood, WA 98087 (Tracking No. 9405 5301 0935 5338 5187 48). *See Exhibit 2.*

6. On May 8, 2026, undersigned counsel made a final attempt to contact the Respondent by transmitting this motion by electronic mail to cirley-cristina@hotmail.com, together with a complete copy of the case file (eROP), and reiterating the upcoming hearing date, the importance of appearing before the Court, and the urgent need to retain new counsel. *See Exhibit 3.*

7. The Respondent's consent to this withdrawal could not be obtained due to her complete and sustained unavailability. As documented above, all known means of communication have been exhausted without response, none of which produced any reply. Where a respondent has severed all contact with counsel and cannot be located despite diligent efforts, the absence of express consent does not preclude the granting of withdrawal. Continuing to serve as attorney of record under these circumstances would be inconsistent with the undersigned's ethical obligations and would constitute a fiction of representation rather than its substance.

8. Granting this motion will not prejudice the Government. The case remains at the Master Calendar stage, with no individual hearing scheduled and no pending dispositive filings. DHS has been electronically served with all documents throughout these proceedings and is fully apprised of the case status. No government interest is impaired by the withdrawal of counsel at this procedural stage.

9. The Respondent was advised in the foregoing communications of the next scheduled Master Calendar Hearing on January 31, 2028, at 8:30 AM, before Immigration Court at 915 2nd Avenue, Suite 613, Seattle, WA 98174, of the importance of appearing at all scheduled hearings and updating her address with the Court, and of the urgent need to retain new counsel to avoid proceeding unrepresented, given that failure to appear may result in a removal order being issued against her and any beneficiaries in absentia. *See* Exhibit 3.

10. For the foregoing reasons, good cause has been established for the granting of this motion consistent with the standards of *Matter of Rosales*, 19 I&N Dec. 655 (BIA 1988): the Respondent will not be prejudiced by the withdrawal given the substantial time remaining before the next hearing; the Government will suffer no prejudice; counsel has made all reasonable efforts to notify the Respondent through multiple channels; and continued representation is impossible given the Respondent's sustained non-response and failure to satisfy contractual obligations.

**WHEREFORE**, the undersigned counsel respectfully requests that this Honorable Court grant this Motion and permit withdrawal as counsel of record in the above-captioned proceedings.

Respectfully Submitted,



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

# Exhibit list

Exhibits:

Pages:

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## **Exhibit 1**

E-mail Notifying Respondent of Withdraw as Counsel 1-2

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Letter Notifying Respondent of Withdraw as Counsel 3-8

Mail Receipt for Letter Notifying Respondent of Withdraw as Counsel 9

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## **Exhibit 3**

E-mail serving Motion to Withdraw as Counsel 10-11

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# **Exhibit 1**



Nicolly Moreira Nascimento &lt;nicolly.moreira@yousalaw.com&gt;

## Encerramento da Representação Legal / Termination of Legal Representation - Cirley Cristina Affonso de Souza

2 mensagens

Nicolly Moreira Nascimento &lt;nicolly.moreira@yousalaw.com&gt;

23 de abril de 2026 às 16:19

Para: cirley-cristina@hotmail.com, administrador YOUSA LAW &lt;admin@yousalaw.com&gt;

Boa tarde, Cirley!  
Espero que esteja bem.

Segue em anexo uma carta oficial referente ao seu caso e à continuidade dos serviços contratados. Este comunicado tem como objetivo informar o encerramento da nossa representação legal em seu processo.

Pedimos, por gentileza, que leia o documento com atenção.  
Permanecemos à disposição caso tenha alguma dúvida ou necessite de esclarecimentos sobre seu caso.

At.te  
--

Good afternoon, Cirley!  
I hope you are well.

Please find attached an official letter regarding your case and the continuation of the contracted legal services. This communication is intended to inform you of the termination of our legal representation in your case.

We kindly ask you to read the document carefully.  
We remain available should you have any questions or require clarification regarding your case.

At.te  
--



Nicolly Moreira  
Analista Financeiro  
+1 (510) 459-2727



yousalaw.com

### 2 anexos



**Defensive Asylum - FINAL LETTER - Cirley Cristina Affonso de Souza.pdf**  
1780K



**Cirley Cristina Affonso de Souza eRep.pdf**  
19575K

administrador YOUSA LAW &lt;admin@yousalaw.com&gt;

23 de abril de 2026 às 21:14

Para: Nicolly Moreira Nascimento &lt;nicolly.moreira@yousalaw.com&gt;

Oii Nicolly,

REF-USPS-04-23-2026-Encerramento da Representação Legal-Termination of Legal Representation - Cirley Cristina Affonso de Souza

### Encerramento da Representação Legal / Termination of Legal Representation - Cirley Cristina Affonso de Souza

I applied above through USPS Priority on April 23, 2026. I have also uploaded the receipt.

16221 North Rd #t3 - Lynnwood, WA 98087

**Tracking number:9405 5301 0935 5338 5187 48**

[Texto das mensagens anteriores oculto]



**REF-USPS-04-23-2026-Encerramento da Representação Legal-Termination of Legal Representation -  
Cirley Cristina Affonso de Souza.pdf**

95K

# **Exhibit 2**

**April 23, 2026**

Cirley Cristina Affonso de Souza  
16221 North Rd, Apt T3  
Lynnwood, WA 98087  
cirley-cristina@hotmail.com

**Dear Ms. Cirley Cristina Affonso de Souza,**

I hope this letter finds you well. Through this letter, and due to unsuccessful attempts to contact you over the past several months, as well as your failure to comply with your contractual obligations, we hereby notify you of the termination of legal representation in your case, in accordance with applicable ethical and legal regulations.

We have attempted to contact you multiple times by phone and messages regarding the regularization of your case; however, we have not been successful. This lack of action has made it impossible to proceed with your case and to provide adequate legal services on your behalf.

In recent weeks (on April 9 and April 16), we sent two letters to your last known residential address and email on file, requesting that you urgently contact our office to address pending matters. We also informed you that your lack of response would be interpreted as a lack of interest in continuing your case. Once again, we did not receive any response.

Given these circumstances, we have no alternative but to terminate our representation in your asylum case before the Immigration Court and any related applications.

Please note that communication and the exchange of information between the client and the legal team are essential for the proper exercise of legal representation. The absence of such communication results in a breakdown of trust in the attorney-client relationship. Due to this situation and the impossibility of maintaining effective communication necessary to continue our work, we are compelled to cease providing legal services in your case.

For this reason, we hereby notify you of the termination of representation, formally ending our professional relationship.

During the period in which our office represented you, we completed the following actions in your case, in addition to providing ongoing assistance:

1. Form I-589 (Application for Asylum and for Withholding of Removal), including a request for protection under the Convention Against Torture (CAT), duly completed and electronically filed through the ECAS/EOIR system with the Immigration Court;
2. Form EOIR-33 (Change of Address/Contact Information);
3. Preparation and submission of a Supplemental Evidence Package, including:

**PO Box 90487** San Diego, CA 92169

- Drafting and translation of statements and support letters from witnesses and family members;
  - Personal Statement;
  - Organization of documentary evidence, including passport, civil records (marriage/divorce certificates), police reports, and psychological report, all with certified translations;
4. Preparation and filing of a Response to the Pre-Hearing Order;
  5. Execution and submission of Proof of Service, providing copies of all filed documents to DHS counsel, as required by procedural rules;
  6. Form I-765 (Application for Employment Authorization) filed with USCIS;
  7. Receipt notices for Form I-765;
  8. Approval notice for the Employment Authorization Application.

Please be advised that you have a hearing scheduled for **January 31, 2028, at 8:30 AM**, at the following address:

**915 2nd Avenue, Suite 613, Seattle, WA 98174.**

All applicants must appear in person at the date, time, and location indicated.

Please note that, prior to any hearing, including the Master Hearing and the Individual Hearing, it is your responsibility to ensure the timely submission of all evidence and documentation you intend to use in your case. In particular, for the Individual Hearing, the Immigration Court generally sets a deadline of up to 30 (thirty) days prior to the hearing for the submission of all evidence, although this deadline may vary depending on the judge's specific instructions in your case. Failure to comply with these deadlines may result in the exclusion of such evidence.

Additionally, please be advised that any change of address must be formally reported to the Immigration Court by filing Form EOIR-33 within 5 (five) days of the change. Failure to do so may result in adverse consequences to your case.

Please also note that failure to appear at your scheduled hearing may result in a removal order being issued against you and your beneficiaries.

In any event, it is strongly recommended that you seek legal representation from another attorney to ensure that your case proceeds appropriately.

Enclosed with this letter is a complete copy of your file with the Immigration Court, including Form I-589 (Application for Asylum and/or Withholding of Removal) submitted to the Court.

We remain available to provide additional information regarding your case and guidance on next steps, if necessary.

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

**Sincerely,**



**Otavio Haverroth Silva**

Attorney SBN#343486

YOUUSA Law Firm

P.O. Box 90487

San Diego, CA 92169

23 de abril de 2026

Cirley Cristina Affonso de Souza  
16221 North Rd, Apt T3  
Lynnwood, WA 98087  
cirley-cristina@hotmail.com

Prezado Sra. Cirley Cristina Affonso de Souza,

Espero que esta carta encontre-a bem. Venho por meio desta, diante das tentativas infrutíferas de contato ao longo dos últimos meses e do não cumprimento por sua parte das obrigações contratuais, notificá-la do encerramento da representação legal no seu caso, conforme regulamentos éticos e legais aplicáveis.

Tentamos contatá-la diversas vezes por telefone e por mensagens para tratar sobre a regularização do seu processo. Contudo, não obtivemos sucesso. Essa ausência de regularização impossibilitou o andamento do processo e a prestação de serviços jurídicos adequados em seu nome.

Nas últimas semanas (nos dias 09 e 16 de abril), enviamos, de forma continuada, duas cartas ao seu último endereço de residência e ao seu email informados, solicitando que efetuasse contato urgente com o escritório para dar seguimento às questões pendentes, informando-o ainda que o seu silêncio seria interpretado como falta de interesse na continuidade do processo. Novamente, não obtivemos resposta.

Considerando esse contexto, não há alternativa senão o encerramento da representação no seu processo de asilo junto à Corte de Imigração e aplicações derivadas.

Destaco que a comunicação e troca de informações entre o cliente e a equipe contratada é indispensável para o adequado exercício da representação profissional, sem a qual se verifica uma quebra de confiança na relação cliente-advogado. Diante dessa situação e da impossibilidade de manter uma comunicação eficaz para a devida continuidade do nosso trabalho, vejo-me obrigado a cessar a prestação dos serviços advocatícios em relação ao seu caso.

Por essa razão, notifico por meio desta o encerramento da representação, formalizando o término da nossa relação profissional.

Durante o período em que nosso escritório a representou, procedemos às seguintes atividades no seu processo, além de atendimentos contínuos à senhora:

1. Formulário I-589 (Pedido de Asilo e Retenção de Remoção), com pedido sob a Convenção Contra a Tortura (CAT), devidamente preenchido e protocolado eletronicamente via sistema ECAS/EOIR perante a Corte de Imigração;
2. Formulário EOIR-33 (Mudança de Endereço/Contato);
3. Montagem e submissão de Pacote de Evidências Suplementares, incluindo:
  - Drafting e tradução de declarações e cartas de apoio de testemunhas e familiares;
  - Declaração Pessoal (Personal Statement);
  - Organização de provas documentais, incluindo passaporte, certidões civis (casamento/divórcio), relatórios Policiais (B.O.s) e Relatório Psicológico, todos com as devidas traduções juramentadas;
4. Preparação e protocolo de Resposta à Ordem Pré-Audiência (Pre-Hearing Order);
5. Execução e envio de Prova de Serviço (Proof of Service), encaminhando cópias de todos os documentos protocolados ao conselho do DHS, conforme exigido pelas normas processuais;
6. Formulários I-765 (Aplicação para Autorização de Emprego) junto à USCIS;
7. Avisos de recebimento dos formulários I-765;
8. Notificação de aprovação da Aplicação para Autorização de Emprego.

Lembro que você possui uma **audiência agendada para o dia 31/01/2028, às 08:30h, em 915 2ND AVENUE, SUITE 613, SEATTLE, WA 98174**. Todos os aplicantes devem comparecer presencialmente no seguinte endereço, no dia e horário indicados.

Ressalto ainda que, antes da realização de qualquer audiência, incluindo Master Hearing e Individual Hearing, é sua responsabilidade garantir o envio prévio de todas as provas e evidências que pretende utilizar em seu caso. Em especial, **para a audiência individual (Individual Hearing), a Corte de Imigração geralmente estabelece o prazo de até 30 (trinta) dias antes da audiência para a submissão de todas as evidências**, podendo esse prazo variar conforme determinação específica do juiz no seu caso. O não cumprimento desses prazos pode resultar na não aceitação das provas apresentadas.

Além disso, informo que qualquer mudança de endereço deve ser comunicada formalmente à Corte de Imigração por meio do formulário EOIR-33, no prazo de até 5 (cinco) dias após a alteração, sob pena de prejuízos ao seu processo.

Destaco ainda que, **se você não comparecer à audiência agendada, será expedida uma ordem de remoção em seu nome e de seus beneficiários.**

De todo modo, é extremamente aconselhado que o senhor busque obter representação processual por meio de outro advogado, para que o seu caso tramite da forma mais adequada possível.

Junto a essa carta, envio uma **cópia da íntegra do seu processo junto à Corte de Imigração**, incluindo o Formulário I-589 (Aplicação para Asilo e/ou Embargos a Processo de Remoção) submetido à corte.

Permaneço disponível para fornecer informações adicionais sobre seu caso e orientações sobre os próximos passos, se necessário.

Agradeço pela compreensão e desejo sucesso nas próximas etapas.

Atenciosamente,



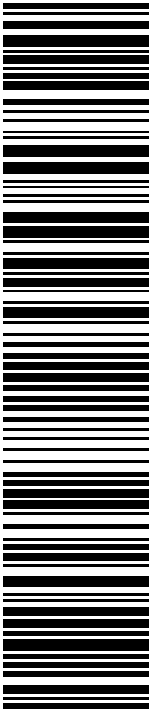
**Otavio Haverroth Silva**

Advogado SBN#343486

YOUUSA Law Firm


P.O. Box 90487

San Diego, CA 92169



**USPS TRACKING #**

9405 5301 0935 5338 5187 48



CIRLEY CRISTINA AFFONSO DE SOUZA  
APT T3  
16221 NORTH RD  
LYNNWOOD WA 98087-9398

**P**

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USPS.com 9405 5301 0935 5338 5187 48 0100 5001 0009 8087  
 US POSTAGE \$10.05  
 04/24/2026 1 lb 0 oz  
 Mailed from 92169 356199505414915

YOU SA LAW - HS LAW  
 OTAVIO H SILVA  
 PO BOX 90487  
 SAN DIEGO CA 92169-2487

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 Legal Flat Rate Envelope  
**RDC 03**  
**C081**

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## Instructions

1. Please use a laser or laser-quality printer.
2. Adhere shipping label to package with tape or glue - DO NOT TAPE OVER BARCODE. Be sure all edges are secure. Self-adhesive label is recommended.
3. Place label so that it does not wrap around the edge of the package.
4. Each shipping label number is unique and can be used only once - DO NOT PHOTOCOPY.
5. Please use this shipping label on the "ship date" selected when you requested the label.
6. If a mailing receipt is required, present the article and Online e-Label Record at a Post Office for postmark.

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Print Date: 2026-04-24	<b>PRIORITY MAIL®</b>	\$10.05
Ship Date: 2026-04-24	Extra Services:	\$0.00
	Fees:	\$0.00
	<b>Total:</b>	<b>\$10.05</b>

**From:** YOU SA LAW - HS LAW  
 OTAVIO H SILVA  
 PO BOX 90487  
 SAN DIEGO CA 92169-2487

**To:** CIRLEY CRISTINA AFFONSO DE SOUZA  
 APT T3  
 16221 NORTH RD  
 LYNNWOOD WA 98087-9398

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Thank you for shipping with the United States Postal Service!  
 Check the status of your shipment on the USPS Tracking® page at [usps.com](https://usps.com)

# **Exhibit 3**



Rafaela Teixeira Silva &lt;rafaela.teixeira@yousalaw.com&gt;

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**Motion to Withdraw as Counsel – Cirley Cristina Affonso de Souza**

1 mensagem

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**Rafaela Teixeira Silva** <rafaela.teixeira@yousalaw.com>  
Para: cirley-cristina@hotmail.com  
Cc: Ananda Oliveira <ananda@yousalaw.com>

8 de maio de 2026 às 14:28

Dear Ms. Cirley Cristina Affonso de Souza,

I hope this message finds you well.

As emphasized in all previous letters and emails we have sent, please find attached the **Motion to Withdraw as Counsel**, a document that formalizes the request to withdraw representation before the Immigration Court.

Please be reminded that:

**Your next Master Hearing will be held in person on** January 31, 2028 at 8:30 AM.

Immigration Judge: Mcseveney, Robert B.C.

**Court Address:**

915 2ND AVENUE, SUITE 613  
SEATTLE, WA 98174

**It is very important that you attend this hearing on time and inform the Immigration Court of your change of address.** Failure to appear at the hearing or to receive notifications may result in a removal order being issued in your absence.

**We strongly recommend that you seek and retain a new attorney as soon as possible** so that you have professional legal assistance in preparing for the hearing and complying with all case deadlines.

I am also attaching, once again, a full copy of your case file (eROP).

If you have any questions regarding the content of this document or the next steps, please do not hesitate to contact us.

Sincerely,

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Prezada Sra. Cirley Cristina Affonso de Souza,

Espero que esta mensagem a encontre bem.

Conforme enfatizado em todas as cartas e e-mails que encaminhamos anteriormente, encaminho em anexo a **Motion to Withdraw as Counsel**, documento que formaliza o pedido de retirada de representação perante o Tribunal de Imigração.

Lembramos que:

**Sua próxima Master Hearing será presencial** no dia 31 de Janeiro de 2028 às 8:30 AM.

Juiz de Imigração: Mcseveney, Robert B.C.

**Endereço da Corte:**

915 2ND AVENUE, SUITE 613  
SEATTLE, WA 98174

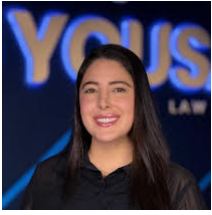
**É muito importante que a senhora compareça a essa audiência pontualmente e que atualize imediatamente a Corte de Imigração sobre sua mudança de endereço.** A falta de comparecimento à audiência ou de recebimento das notificações pode resultar em uma ordem de remoção proferida na sua ausência.

**Recomendamos fortemente que a senhora procure e contrate um novo advogado o quanto antes**, para que tenha assistência jurídica profissional na preparação para a audiência e no cumprimento de todos os prazos do processo.

Estou mandando também em anexo, novamente, cópia da íntegra do seu processo.

Caso tenha alguma dúvida sobre o conteúdo do documento ou sobre os próximos passos, por favor, entre em contato.

Atenciosamente,



**Rafaela Teixeira Silva**

LEGAL TEAM

✉ [rafaela.teixeira@yousalaw.com](mailto:rafaela.teixeira@yousalaw.com)



San Diego, USA & Florianópolis, BR



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**2 anexos**

 **Motion\_to\_withdraw\_Cirley.pdf**  
151K

 **eROP Cirley Cristina Afonso de Souza.pdf**  
19575K

**Proof of Service**

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

**MOTION TO WITHDRAW AS COUNSEL**

To the following:

<b>Office Location:</b>  Office of the Principal Legal Advisor Department of Homeland Security 915 Second Avenue, Suite 708 Seattle, WA 98174	<b>Mailing Address:</b>  Office of the Principal Legal Advisor Department of Homeland Security Office of the Chief Counsel 915 Second Avenue, Suite 708 Seattle, WA 98174
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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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**Otavio Silva (Bar N. 343486)**  
**Attorney at Law**  
**P.O. Box 90487**  
**San Diego, CA 92169**  
*Counsel for Respondent*