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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	
Giovanna Izabely Alves Saraiva	**File No. A. 256-048-806**
In Removal Proceedings	

Immigration Judge: Carman, Andre **Next Hearing Date:** October 29, 2026 at 8:30 AM

RESPONDENT'S MOTION FOR CONTINUANCE

UNITED STATES DEPARTMENT OF JUSTICE
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In the Matter of	)	
Giovanna Izabely Alves Saraiva	)	**File No. A. 256-048-806**
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RESPONDENT'S MOTION FOR CONTINUANCE

The undersigned counsel hereby respectfully requests a continuance of the upcoming Master Hearing currently scheduled for **October 29, 2026**, **at 8:30 AM** and in support states the following:

1. This is Respondent's first request for a continuance in these proceedings.
2. The undersigned counsel has only recently been retained to represent the Respondent in these proceedings. A Notice of Entry of Appearance (Form EOIR-28) was filed on September 16, 2026.
3. 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.
4. Respondent has viable claims for relief from removal, including applications for asylum, withholding of removal, and possibly protection under the Convention Against Torture (CAT).
5. In order to provide effective representation, undersigned counsel respectfully requests additional time to review the case file, gather supporting documentation, and prepare the appropriate applications for relief. Respondent intends to file a complete Form I-589, Application for Asylum and for Withholding of Removal, along with all supporting evidence.

6. Additionally, Respondent is currently in a relationship with a United States citizen and anticipates marriage in the near future, which may give rise to a potential family-based avenue of relief. Undersigned counsel requires time to evaluate this possibility and how it may relate to Respondent's case.
7. Additional time will ensure that the application 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.

Thus, a continuance is warranted given that undersigned counsel has only just entered representation and requires adequate time to review the record, assess the merits of the case, and complete the Respondent's Form I-589 application for asylum and related relief.

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

Giovanna Izabely Alves Saraiva **File No. A. 256-048-806**

Proof of Service

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

RESPONDENT'S MOTION FOR CONTINUANCE

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.



Otavio Haverroth Silva (Bar N. 343486)
Attorney at Law
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Counsel for Respondent