

**Zaia Law LLC
Castilho Zaia, Guilherme Borcelli
11810 Grand Park Ave
Ste 500
North Bethesda, MD 20852**

Non-Detained

**UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
IMMIGRATION COURT
130 Delaware Avenue, Suite 300
Buffalo, NY 14202**

	)	
In the Matter of	)	
	)	
Douglas Santos Conclaves	)	File No. A 220-762-085
Debora Do Carmo Andrade Santos	)	File No. A 220-762-086
Bianca Santos Andrade	)	File No. A 220-762-087
Beatriz Santos Andrade	)	File No. A 220-762-088
Benicio Santos Andrade	)	File No. A 220-762-089
	)	
In Removal Proceedings	)	
	)	
	)	

Immigration Judge: **Baumgarten, Mary C.** Next Hearing Date: **July 31, 2026, at 1:00 PM**

RESPONDENTS' MOTION TO CONTINUE

**UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
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Benicio Santos Andrade	)	File No. A 220-762-089
	)	
In Removal Proceedings	)	
	)	
	)	

RESPONDENTS' MOTION TO CONTINUE

The undersigned counsel hereby respectfully requests a continuance of the upcoming Individual Hearing currently scheduled for July 31, 2026 at 1:00 PM, and in support states the following:

1. The Individual Hearing in the above-captioned matter is currently scheduled for **July 31, 2026, at 1:00 p.m.** before the Buffalo Immigration Court.
2. Counsel of record, Guilherme B. Castillo Zaia, has a previously scheduled and non-waivable professional conflict on the same date and time. Specifically, counsel is required to appear in person for a **Semi-Protracted Custody Hearing** before the **Court of Common Pleas of Philadelphia County, Family Court Division**, scheduled for **July 31, 2026, at 1:00 p.m.**
3. Counsel is unable to appear in both proceedings simultaneously, as they are located in different states (Pennsylvania and New York).
4. A copy of the Philadelphia Family Court Order is attached hereto as **Exhibit A**. All identifying information concerning the parties and the minor child in that unrelated matter has been redacted to protect client confidentiality and the privacy of a minor,

consistent with counsel's ethical obligations.

Pursuant to 8 C.F.R. § 1003.29, a continuance may be granted for good cause shown. Good cause exists to grant this continuance. Counsel's unavailability is due to a legitimate, previously scheduled court appearance in another jurisdiction. The conflict is not of counsel's making and cannot be resolved without prejudicing either the Respondent in this matter or the client in the Philadelphia custody proceeding.

The requested continuance is not sought for purposes of delay, but rather to ensure that Respondent receives effective representation at the Individual Hearing.

WHEREFORE, counsel respectfully requests that this Honorable Court grant the requested continuance and reschedule the Individual Hearing to a later date.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'G. Castilho Zaia', is written over a horizontal line.

Guilherme Castilho Zaia (Bar N. 334469)
Attorney at Law
11810 Grand Park Ave, Ste 500
North Bethesda, MD 20852
Counsel for Respondent

Exhibit list

Exhibits:

Pages:

Exhibit 1 - Evidence of Counsel's Scheduling Conflict

Order from Philadelphia Family Court Scheduling Custody Hearing	1-4
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Exhibit 1 - Evidence of Counsel's Scheduling Conflict

Mailer Page

[REDACTED]	
GUILHERME B. CASTILLO ZAIA 11810 GRAND PARK AVE STE 500 NORTH BETHESDA, MD 20852	

Mailer Page
[REDACTED]

Attached, please find an Order of Court for a Custody hearing/conference scheduled in the Domestic Relations Division of Philadelphia Family Court. Please bring with you any information you feel is important regarding why you should have custody, partial custody or visitation. Information may include school or medical records or evidence regarding the best interest of the child(ren).

In accordance with 23 Pa.C.S. § 5328, please find list of custody factors that will be considered when awarding custody.



CASE ID [REDACTED]

IN THE COURT OF COMMON PLEAS OF PHILADELPHIA COUNTY

[REDACTED] PETITIONER VS. [REDACTED] RESPONDENT	FAMILY COURT DIVISION CIVIL ACTION <u>CUSTODY</u> SEMI-PROTRACTED CUSTODY HRG No. [REDACTED]
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ORDER OF COURT

You, [REDACTED]
PETITIONER have sued in court to obtain
Custody, partial custody or supervised physical custody of the child(ren):
[REDACTED]

You are ordered to appear in person on 31-JUL-2026 at 01:00 PM before
Honorable TIFFANY PALMER for a hearing/conference at:
COURTROOM 3D - 3RD FLOOR
1501 ARCH STREET
PHILADELPHIA PA 19102

If you fail to appear as provided by this Order an Order for Custody,
Partial Custody, or supervised physical custody may be entered against you
or the Court may issue a warrant for your arrest.

****DO NOT bring children to this event unless otherwise ordered by the
presiding judge or hearing officer.****

You must file with the court a verification regarding any criminal record
or abuse history regarding you and any member of your household at the
initial in-person contact with the court (including, but not limited to, a
conference with a conference officer or judge or conciliation) or within
30 days of service of the initiating pleading, whichever occurs first.

No party may make a change in the residence of any child which
significantly impairs the ability of the other party to exercise custodial
rights without first complying with all of the applicable provisions of 23
Pa.C.S. § 5337 and Pa.R.Civ.P. 1915.17 regarding relocation.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER IMMEDIATELY. IF YOU DO NOT HAVE A LAWYER, YOU MAY CONTACT THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER. IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

PHILADELPHIA BAR ASSOCIATION
LAWYER REFERRAL AND INFORMATION SERVICE (LRIS)
1101 MARKET STREET, 10th FLOOR
PHILADELPHIA, PA. 19107
TELEPHONE (215) 238-6333
www.PhiladelphiaBarLawyers.com

AMERICANS WITH DISABILITIES ACT OF 1990 The Court of Common Pleas of Philadelphia County is required by law to comply with the Americans with Disabilities Act of 1990. For information about accessible facilities and reasonable accommodations available to disabled individuals having business before the court, please contact our office. All arrangements must be made at least 72 hours prior to any hearing or business before the court. You must attend the scheduled conference or hearing.

BY THE COURT,
WALTER J. OLSZEWSKI

Date 04/14/2026

Cc GUILHERME B. CASTILLO ZAIA

Douglas Santos Conclaves
Debora Do Carmo Andrade Santos
Bianca Santos Andrade
Beatriz Santos Andrade
Benicio Santos Andrade

A 220-762-085
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A 220-762-089

PROOF OF SERVICE

On this day, I, Guilherme Castilho Zaia, 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 250 Delaware Avenue, Suite 773 Buffalo, NY 14202	US Immigration and Customs Enforcement US Department of Homeland Security Office of the Principal Legal Advisor 250 Delaware Avenue, Suite 773 Buffalo, NY 14202

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.



Guilherme Castilho Zaia (Bar N. 334469)
Attorney at Law
11810 Grand Park Ave, Ste 500
North Bethesda, MD 20852
Counsel for Respondent