

The following 3 templates (MCH, Bond, Merits) are designed as a hearing planning tool as well as a way to take notes. You can add and remove content as necessary for your specific case.

Hearing Plan – Master Calendar Hearing (MCH)

A#:

IJ:

TA:

MCH Date:

Evidence or Filing Deadline(s):

Language:

Pleadings

- **Factual allegations** – admit/deny. Basis for denying:
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- **Charges** – concede/deny. Basis for denying (burden on DHS, legal issue, etc.):
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- **Country:** [Respectfully decline if fear-based]
- **If asked, possible relief:**
- **Additional arguments about the NTA** (time/date, improper service, wrong NTA or errors, etc.):

Additional Matters

- **Motions filed/to file:**
- **Evidence** (if relevant):
 - Evidence filed/to file:
 - Prelim Objections:
 - Exhibit at issue:
 - Objection:
 - Request for DHS to produce documents
- **Client Competency** – Safeguards/MAM hearing requested:
- **Scheduling:**
 - **Blackout dates** (dates that don't work for you):
 - **Continuance Request** (if relevant) – Length/basis for continuance:
 - **Next Hearing Date:**
 - **Next Evidence or Filing Deadline(s):**
- **Special Instructions from IJ:**

Concerns

- **Off-the Record Conversations:**
- **Misconduct (IJ/DHS/translator/other):**

Hearing Plan – Bond

A#:

IJ:

TA:

Bond Hearing Date:

Evidence or Filing Deadline(s):

Language:

Statement of the Case:

The respondent does not pose a danger to the community and is not a flight risk because:

Profer

- Not a danger to the community because:
- Not a flight risk because:
- Arguments to address only if DHS brings them up:

Summary of IJ Decision:

- **Bond: \$**
- **Conditions:**

Preliminary Matters to Address with DHS/IJ

- Stipulations:
- Supplementary or late filed evidence/amendments:

Evidence Admitted:

- Exh. 1:
- Exh. 2:
- Exh. 3:
- Exh. 4:
- **Objections to Evidence:**
 - Respondent's Evidence:
 - Court Exhibit:
 - DHS Objections:
 - Admitted Y/N:
 - Government's Evidence:
 - Court Exhibit:
 - Objection:
 - Admitted Y/N:

Concerns

- **Off-the Record Conversations:**
- **Misconduct (IJ/DHS/translator/other):**

Hearing Plan – Individual

A#:

IJ:

TA:

Individual Hearing Date:

Evidence or Filing Deadline(s):

Language:

Preliminary Matters to Address with DHS/IJ

- **Stipulations:**
- **Supplementary or late filed evidence/amendments:**
- **Status of Motions filed/to file:**
- **Witnesses** (sequestered, order of witnesses, expert credentials, time constraints):

Evidence Admitted:

- Exh. 1:
- Exh. 2:
- Exh. 3:
- Exh. 4:

- **Objections to Evidence:**
 - Respondent's Evidence:
 - Court Exhibit:
 - DHS Objections:
 - Admitted Y/N:
 - Government's Evidence:
 - Court Exhibit:
 - Objection:
 - Admitted Y/N:

Testimony

- **Respondent**
- **Direct Exam Questions**
- **Cross Notes**
- **Anticipated Redirect Questions** (for issues you think may come up on cross)
- **Objections to Direct/Cross:**
 - Respondent's Objection:
 - Basis:
 - Sustained/overruled
 - Government's Evidence:
 - Basis:
 - Sustained/overruled

- **For the Record:**
- The respondent is crying/nodding yes/pointing at:
- Translation issues
- **Witness 1**
- **Direct Exam Questions**
- **Cross Notes**
- **Anticipated Redirect Questions** (for issues you think may come up on cross)

- **Objections to Direct/Cross:**
 - Respondent's Objection:
 - Basis:
 - Sustained/overruled
 - Government's Evidence:
 - Basis:
 - Sustained/overruled
- **For the Record:**
- The witness is crying/nodding yes/pointing at:
- Translation issues

Concerns

- **Off-the Record Conversations:**
- **Misconduct (IJ/DHS/translator/other):**

Statement of the Case:

- X is not removable because:
- X is statutorily eligible for ____ and merits a favorable exercise of discretion/a grant of relief because:

Closing:

- Summation
- [Key Point 1]
- [Key Point 2]
- [Key Point 3]
- Arguments to address only if DHS brings them up:
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- [Humanize client by mentioning family, dreams, suffering or something else powerful that will stick with the IJ]

Summary of IJ Decision:

Reserve Appeal:

- DHS/Respondent?

Hearing Not Completed:

- Reason:
- Next Hearing Date:
- Evidence or Filing Deadline(s):
- Special Instructions from IJ:

Quick reference notes for yourself:

- Procedural History
- Factual Timeline of Client's Story
- Key Case Law