

**EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
IMMIGRATION COURT
CHICAGO, ILLINOIS**

In the Matter of XXXX XXXXX In removal proceedings	Hon. Robin J. Rosche No. A XXX XXX XXX Individual Hearing: June 20, 2016 at 1:00 p.m.
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**RESPONDENT'S MOTION TO REQUEST THE ADMISSION
OF TELEPHONIC TESTIMONY**

Respondent, by and through counsel, moves this court to admit telephonic testimony of an expert witness at his merits hearing. In support of this motion,

Respondent states as follows:

1. Respondent's merits hearing on his request for asylum, withholding of removal and protection under the Convention Against Torture is scheduled for June 20, 2016, at 1:00 p.m.
2. Respondent has retained Mr. NAME to testify on a *pro bono* basis as an expert witness on the persecution of Eritreans who evade or flee from National Service. Mr. NAME is president of PLACE, a small non-profit organization dedicated to helping resettle Eritreans who fled Eritrea. Mr. NAME will testify about his work with Eritreans who suffered persecution and on the likelihood that Respondent would be persecuted on account of his imputed political opinion and membership in a particular social group of Eritreans who left National Service and Eritrea without government permission.

3. Respondent's counsel works for the National Immigrant Justice Center, a non-profit organization that provides free legal representation to asylum seekers.
Respondent is being provided legal representation free of charge.
4. Respondent is detained at this time and is unable to pay for his attorney or expert witness.
5. Mr. NAME office is located in PLACE and it would be impossible for him to testify in-person at Respondent's merits hearing while meeting his many other professional responsibilities.

Accordingly, Respondent requests that this Honorable Court enter an Order admitting the telephonic testimony of Mr. NAME at his merits hearing on June 20, 2016. Mr. NAME will be available at (610) 891-8470 on June 20, 2016 from 1:00 p.m. (central time) until the end of the hearing.

June 10, 2016

Respectfully submitted,

NAME, Staff Attorney
FIRM
ADDRESS
CONTACT INFORMATION
Attorney for Respondent