

**UNITED STATES DEPARTMENT OF JUSTICE  
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW  
IMMIGRATION COURT  
CHICAGO, ILLINOIS**

In the Matter of	<b>DETAINED</b>
<b>CLIENT NAME,</b> <i>Respondent</i>	No. A NUMBER
In removal proceedings	Next Master Calendar Hearing: DATE AND TIME JUDGE NAME

**MOTION TO SUBSTITUTE COUNSEL**

Pursuant to 8 C.F.R. §1003.17(b) and Section 2.3(i) of the Immigration Court Practice Manual, Respondent, by and through undersigned counsel, requests that the Court allow NIJC ATTORNEY to be substituted by PB ATTORNEY as counsel of record in his removal proceedings. In support of this motion, Respondent states the following:

1. Respondent's next master calendar hearing is scheduled for DATE at TIME.
2. NIJC ATTORNEY of National Immigrant Justice Center (NIJC) previously filed an EOIR-28, Notice of Entry of Appearance as Representative, in Respondent's proceedings. NIJC ATTORNEY appeared at Respondent's last master calendar hearing on DATE and requested a continuance for attorney preparation.
3. NIJC is a non-profit, Board of Immigration Appeals (BIA)-accredited organization serving low-income noncitizens, including those in Department of Homeland Security (DHS) custody. In order to provide legal services to a greater number of detained noncitizens, NIJC partners with volunteer attorneys from the private bar to provide *pro bono* legal services to this population.
4. Via its outreach to law firms in the Chicago area, NIJC has been able to secure representation for Respondent by PB ATTORNEY, counsel at the Chicago office for FIRM. PB ATTORNEY is willing and able to represent Respondent in his removal proceedings before the Chicago Immigration Court on a *pro bono* basis.

5. PB ATTORNEY's Form EOIR-28 is attached to this motion.
6. Respondent consents to having NIJC ATTORNEY be substituted by PB ATTORNEY as counsel in his removal proceedings before the Chicago Immigration Court.
7. PB ATTORNEY is prepared to proceed with this case as scheduled and this substitution will not cause undue delay or prejudice to the Department.
8. Respondent requests that NIJC ATTORNEY's appearance be withdrawn and that PB ATTORNEY's be entered as the attorney of record in this matter.

Dated: \_\_\_\_\_

Respectfully submitted,

\_\_\_\_\_  
PB ATTORNEY INFORMATION

**CERTIFICATE OF SERVICE**

I, PERSON SERVING, hereby certify that on \_\_\_\_\_, I served a true and correct copy of the foregoing Motion to Substitute Counsel on the following persons by the following means:

Karen Lundgren  
Department of Homeland Security  
Office of Chief Counsel

NIJC ATTORNEY  
National Immigrant Justice Center

Via e-service to: NIJC ATTORNEY EMAIL

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In the Matter of CLIENT NAME

A NUMBER

ORDER OF THE IMMIGRATION JUDGE

Upon consideration of Respondent's **Motion to Substitute Counsel**, it is HEREBY ORDERED that the motion be \_\_\_\_\_ **GRANTED** \_\_\_\_\_ **DENIED** because:

\_\_\_\_\_ DHS does not oppose the motion

\_\_\_\_\_ A response to the motion has not been filed with the Court

\_\_\_\_\_ Good cause has been established for the motion

\_\_\_\_\_ The Court agrees with the reasons stated in the opposition to the Motion

\_\_\_\_\_ Other:

\_\_\_\_\_  
Date

\_\_\_\_\_  
Immigration Judge NAME

Certificate of Service

This document was served by:  Mail  Personal Service

To:  Alien  Alien c/o Custodial Officer  Alien's Atty/Rep  DHS

Date: \_\_\_\_\_ By: Court Staff \_\_\_\_\_