

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

In the Matter of          <b>Respondent</b>	No. A          <b>In Removal Proceedings</b>
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**MOTION TO ACCEPT LATE FILING**

Respondent by and through counsel, NAME, of the National Immigrant Justice Center, hereby moves the Immigration Court to accept the late filing of \_\_\_\_\_ in support of his application for cancellation of removal.

In support of this Motion, Respondent states as follows:

1. Undersigned counsel is an attorney at the National Immigrant Justice Center (“NIJC”), a nonprofit organization in Chicago, Illinois that serves low-income immigrants in the Chicago area and throughout Illinois. Undersigned counsel specifically represents detained individuals without charge.
2. Counsel was only recently retained....
3. Counsel was able to obtain a *pro bono* licensed social worker to conduct a psychological evaluation of Respondent’s qualifying relatives and assess the functioning of his family as a whole.
4. This evaluation was not able to take place until Friday, January 5, 2018. The evaluator needed time to draft her evaluation report and so this is the earliest that Respondent could submit this report in support of her application.

5. \_\_\_\_\_ will be available to provide telephonic testimony, if counsel's separate motion is granted, in support of Respondent's application regarding the contents of her evaluation of Respondent's qualifying relatives.

For all the foregoing reasons, Respondent respectfully requests that this Court grant this motion to accept his late filing.

Respectfully submitted,

\_\_\_\_\_  
ATTORNEY  
FIRM

\_\_\_\_\_  
Date

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**ORDER OF THE IMMIGRATION JUDGE**

Upon consideration of the Motion to Accept Late Filing, it is HEREBY ORDERED that the motion be

GRANTED  DENIED because:

DHS does not oppose the motion.

The respondent 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.

The motion is untimely per \_\_\_\_\_.

Other:

**Deadlines:**

The application(s) for relief must be filed by \_\_\_\_\_.

The respondent must comply with DHS biometrics instructions by \_\_\_\_\_.

\_\_\_\_\_  
Date

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

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