

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

In the Matter of

**Respondent**

**No. A**

**In Removal Proceedings**

**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.

# Motion To Advance Immigration

**Lei Huang**



## **Motion To Advance Immigration:**

*Advanced Immigration, 1980* Austin T. Fragomen,1980      *Advanced Immigration Workshop, 1984* Austin T. Fragomen,1984      **Votes and Proceedings** ,1900      **Federal Register** ,1983-04      **Journal** Virginia. General Assembly. Senate,1871      **Parliamentary Debates** New Zealand. Parliament,1863      **Parliamentary Debates** ,1900      **Advanced Criminal Procedure** Yale Kamisar,2002      **Crisis Lawyering** Ray Brescia,Eric K. Stern,2024-09-03 Shines a light on the emerging field of law dedicated to responding to and resolving the crises of the twenty first century In an increasingly globalized world a complex and interlocking web of nations governments non state actors laws and rules affect human behavior When crisis hits whether that be extrajudicial detention unprompted deportation pandemics or natural disasters lawyers are increasingly among the first responders equipped with the knowledge necessary to navigate the regulations of this ever more complex world Crisis Lawyering explores this phenomenon and attempts to identify and define what it means to engage in the practice of law in crisis situations In so doing it hopes to sketch out the contours of the emerging field of crisis lawyering Contributors to this volume explore cases surrounding domestic violence dealing with immigrants in detention and banned from travel policing in Ferguson Missouri the kidnapping of journalists and climate change among other crises Their analysis not only serves as guidance to lawyers in such situations but also helps others who deal with crises understand those crises and the role of lawyers in them better so that they may respond to them more effectively efficiently collaboratively and creatively Crisis Lawyering shines a light on the emerging field of law dedicated to responding to and resolving the complex crises of the twenty first century      **Journal of the Legislative Council of the Province of Canada** ,1996      *Minutes* Jamaica. Legislature. Legislative Council,1931      **Journal of the Senate of Virginia** Virginia. General Assembly. Senate,1871 Vols for 1831 32 1940 include Senate documents      **Parliamentary Debates** Victoria. Parliament,1899      **Votes & Proceedings** New South Wales. Parliament. Legislative Council,1873      **Journals of the Legislative Council of the Dominion of New Zealand** New Zealand. Parliament. Legislative Council,1871      **Debates of the House of Commons of the Dominion of Canada** Canada. Parliament. House of Commons,1880      Official Report of the Debates of the House of Commons of the Dominion of Canada Canada. Parliament. House of Commons,1880      **Official Reports of the Debates of the House of Commons of the Dominion of Canada** Canada. Parliament. House of Commons,1880      Senate documents ,1889      **The Critic** ,1886

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