

July 2, 2015

U.S. Department of Justice

Executive Office for Immigration Review

Board of Immigration Appeals

5107 Leesburg Pike, Suite 2000

Falls Church, VA 20530

**Re: NAME, A### ### ###**

Dear Clerk of Court:

Enclosed please find the following documents for filing in the above captioned case:

1. Respondent’s Request for Extension of Briefing Period
2. EOIR-27 for Sarah Brenes

Thank you for consideration in this matter. I will look forward to receiving the Board’s decision regarding this request in the near future.

Sincerely,

Sarah Brenes

Staff Attorney

Refugee & Immigrant Program

SB/ar

Enclosures

Cc: Office of Chief Counsel

Client

Sarah Brenes

*Pro Bono* Counsel for Respondent

EOIR ZD036236

The Advocates for Human Rights

330 2nd Avenue South, Suite 800

Minneapolis, MN 55401

# UNITED STATES DEPARTMENT OF JUSTICE

**EXECUTIVE OFFICE FOR IMMIGRATION REVIEW**

**BOARD OF IMMIGRATION APPEALS**

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**In the Matter of: )**

**)**

**NAME ) File No. A ### ### ###**

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**In Removal Proceedings )**

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**RESPONDENT’S REQUEST FOR EXTENSION OF BRIEFING PERIOD**

**United States Department of Justice**

**Executive Office for Immigration Review**

**Board of Immigration Appeals**

**Falls Church, Virginia**

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**In the Matter of: )**

**)**

**NAME ) Request for Extension**

**A ### ### ###` ) of Briefing Period**

**)**

The respondent, through counsel, respectfully requests that the Board of Immigration Appeals grant an extension of the briefing period in this case for a period of twenty-one (21) days to allow preparation of a brief in support of the issues presented. The brief is currently due on **July 13, 2015.**

The respondent is now represented by *pro bono* counsel through The Advocates for Human Rights. Respondent prepared his own application for asylum, and was detained throughout his case before the Immigration Judge. He has only recently relocated to Minnesota, and contacted counsel as soon as he was able. The Respondent first met with counsel on May 5, 2015 and counsel has only had a brief opportunity to become familiar with his case before filing the Notice of Appeal.

Due to the very quick turnaround in production of the transcript and setting of the briefing schedule, counsel has not had time to fully review the case and become familiar with the issues. Additionally, The Advocates is seeking a *pro bono* volunteer to assist with the briefing and will need all available time to become familiar with the record of proceedings. Counsel requests additional time to allow sufficient review of the record and preparation of the brief and will meet a revised deadline if an extension is granted. Counsel therefore respectfully requests that the Board extend the briefing period for a period of twenty-one days beyond the current due date of July 13, 2015 to allow the preparation of a brief on the issues presented.

Respectfully submitted,

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

Sarah Brenes

MN Attorney ID 0389798

EOIR ZD036236

The Advocates for Human Rights

330 2nd Avenue South, Suite 800

Minneapolis, MN 55401

(612) 746-4684

**NAME**

**A### ### ###**

**PROOF OF SERVICE**

On July 2, 2015, I, Sarah Brenes, mailed a copy of Respondent’s Request for Extension of Briefing Period and all attached pages to DHS/ICE Office of Chief Counsel at the following addresses by first-class mail:

DHS/ICE Office of Chief Counsel –

ADDRESS

ADDRESS

Signature: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Date: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_