

Hanne Sandison, Esq.
Pro Bono Counsel for Respondent
The Advocates for Human Rights
330 Second Avenue South, Suite 800
Minneapolis, MN 55401 USA
(612) 746-4667
hsandison@advrights.org

DETAINED / IHP

**UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
IMMIGRATION COURT
FORT SNELLING, MINNESOTA**

In the Matter of:

LAST, First

In removal proceedings

)
)
)
)
)
)
)

File No. A XXX-XXX-XXX

Immigration Judge Wood

Next Individual Hearing: August 31, 2021 at 8:30 a.m.

MOTION TO ACCEPT UNTIMELY FILING

LAST, First
A XXX XXX XXX

Respondent, by and through undersigned Counsel, Hanne Sandison, respectfully requests this Court to accept the untimely filing of Respondent's Second Supplemental Evidentiary Submission in support of his application for Deferral of Removal under the Convention Against Torture. Respondent is scheduled for an individual hearing on August 31, 2021.

Respondent submitted his evidentiary filings on August 17, 2021, in accordance with the Court's filing deadline. After the deadline, undersigned counsel received Identification Documents for two individuals who wrote letters in support of Respondent's application. The Identification Documents, attached to this motion, do not significantly impact the case and their late submission does not prejudice The Department of Homeland Security. Their submission merely completes the record.

The late submission of this evidence is not for the purposes of delay. Respondent, through undersigned counsel, respectfully requests the Court accept this late-filed submission.

DATE: August 26, 2021

Respectfully submitted,

Hanne Sandison
The Advocates for Human Rights
330 Second Ave. S., Ste. 800
Minneapolis, MN 55401
612-746-4667
hsandison@advrights.org
Pro Bono Counsel for Respondent

CERTIFICATE OF SERVICE

On August 26, 2021, I, Hanne Sandison, served a copy of this Motion and any attached pages on the Office of the Principal Legal Advisor via E-Service at BLMOCCService@ice.dhs.gov.

Hanne Sandison

8/26/2021

Date

LAST, First
A XXX XXX XXX

**UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
IMMIGRATION COURT
FORT SNELLING, MINNESOTA**

In the Matter of:)
)
LAST, First)
)
)
In removal proceedings)
_____)

File No. A **XXX XXX XXX**

ORDER OF THE IMMIGRATION JUDGE

Upon consideration of respondent's Motion to Accept Untimely 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 **Wood**

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 _____