[Attorney Name] **DETAINED**

*Pro Bono Counsel*

[Firm/Organization]

[Address]

[Address]

**UNITED STATES DEPARTMENT OF JUSTICE**

**EXECUTIVE OFFICE OF IMMIGRATION REVIEW**

**IMMIGRATION COURT**

**FORT SNELLING, MINNESOTA**

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

 )

In the Matter of: )

 ) File No.: [Client A Number]

[Client Name] )

 )

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_)

Immigration Judge: [Judge Last Name] Next Hearing: [Hearing date and time]

**RESPONDENT’S MOTION FOR BOND REDETERMINATION HEARING**

**UNITED STATES DEPARTMENT OF JUSTICE**

**EXECUTIVE OFFICE OF IMMIGRATION REVIEW**

**IMMIGRATION COURT**

**FORT SNELLING, MINNESOTA**

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

 )

In the Matter of: )

 ) File No.: [Client A Number]

[Client Name] )

 )

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_)

**RESPONDENT’S MOTION FOR BOND REDETERMINATION HEARING**

 Respondent, by and through the undersigned counsel, respectfully moves that this court set a bond redetermination hearing in this matter as promptly as possible. In furtherance of said request, Respondent states the following:

1. Respondent’s full name is [\_]. Respondent is a citizen and native of [\_].
2. Respondent has been detained in Sherburn County Jail, Elk River, Minnesota since [\_]. Since that time, he has been working to secure *pro bono* counsel and provide sufficient time for attorney preparation.
3. [INSERT INFORMATION REGARDING TIES TO THE COMMUNITY, ANY IMMIGRATION RELIEF FOR WHICH CLIENT IS APPLYING, WHERE HE WILL LIVE AND WHO WILL PAY BOND, AND INFORMATION REGARDING HIS LACK OF DANGER TO THE COMMUNITY.]
4. Respondent has significant community support in the area. …. *See* Tabs….
5. Respondent is not a danger to the community…*See* Tabs…
6. Respondent will be able to pay bond and secure housing through … *See* Tabs…

WHEREFORE, Respondent respectfully requests that the Court grant him a bond redetermination hearing or, in the alternative, set a [deminimus bond of $1,500] so that he may … and pursue immigration remedies that may be available to him.

[If you do not have all evidence available at this time, inform the court that you will submit additional evidence once the hearing is set]

Respectfully Submitted,

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

[Attorney Name and EOIR Number]

*Pro Bono Counsel*

[Firm/Organization]

[Address]

[Phone number]

[Email]

**UNITED STATES DEPARTMENT OF JUSTICE**

**EXECUTIVE OFFICE OF IMMIGRATION REVIEW**

**IMMIGRATION COURT**

**FORT SNELLING, MINNESOTA**

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

 )

In the Matter of: )

 ) File No.: [Client A Number]

[Client Name] )

 )

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_)

**EXHIBIT LIST**

**TAB PAGE**

1. Letter from [\_] ……………………………………………………………………..1
2. Letter of support from [\_] ……………………………...……………………2
3. Letter from [\_] ………………………………………………..3
4. Criminal History Documents
5. Any other relevant evidence.

**UNITED STATES DEPARTMENT OF JUSTICE**

**EXECUTIVE OFFICE OF IMMIGRATION REVIEW**

**IMMIGRATION COURT**

**FORT SNELLING, MINNESOTA**

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

 )

In the Matter of: )

 ) File No.: [Client A Number]

[Client Name] )

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\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_)

**ORDER OF THE IMMIGRATION JUDGE**

Upon consideration of the Respondent’s Motion for Bond Redetermination Hearing, it is HEREBY ORDERED that the motion be **€ GRANTED € DENIED** because:

* DHS does not oppose the motion.
* The Respondent does not oppose the motion.
* 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

**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\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**PROOF OF SERVICE**

On \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, I, \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, delivered a copy of

Respondent’s Motion for Bond Redetermination Hearing to The Office of Chief Counsel at the

following address via [hand delivery/certified mail]

1 Federal Drive, Suite 1800

Fort Snelling, MN 55111.

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Signed Date