

Medha Devanagondi, Esquire  
PAIR Project  
254 Friend St., 5<sup>th</sup> Floor  
Boston, MA 02114

UNITED STATES DEPARTMENT OF JUSTICE  
EXECUTIVE OFFICE OF IMMIGRATION REVIEW  
IMMIGRATION COURT  
[\*\*Court where case is pending, e.g. HARLINGEN, TEXAS\*\*]

\_\_\_\_\_  
In the Matter of: )  
XXXX, XXXX (Last name, First name) )  
Respondent )  
\_\_\_\_\_ )

File No. AXX XXX XXX

**In Removal Proceedings**  
POST-DECISION MOTION

**MOTION TO CHANGE VENUE**

## **RESPONDENT'S MOTION TO CHANGE VENUE**

Now comes Respondent, XXXX XXXX, and moves this Honorable Court to change the venue of his removal proceedings from [\*\*INSERT COURT WHERE CASE IS PENDING\*\*] to Boston, Massachusetts. He seeks this change of venue pursuant to 8 CFR § 1003.20.

In support of his motion, Respondent states as follows:

- 1) XXXX XXXX is a 43-year-old native of Nicaragua. He entered the U.S. in Texas, but has since moved to the Boston, Massachusetts area. He currently resides at [\*\*INSERT CLIENT'S ADDRESS\*\*]. If the motion is granted, he will continue to reside at this address.
- 2) Mr. XXXX concedes that he is removable as charged. He does not wish to designate a country of removal.
- 3) Mr. XXXX's attorney, potential witnesses, and supporting evidence are in the Boston area. Without a change of venue, he will experience considerable hardship and inconvenience in adequately preparing and presenting testimony in support of his application for asylum, withholding of removal, and relief under the Convention Against Torture.
- 4) The Department of Homeland Security would not suffer any prejudice as a result of a change of venue to Boston, Massachusetts.

Wherefore, for these reasons, Respondent requests that his case be transferred from [\*\*INSERT COURT WHERE CASE IS PENDING\*\*] to Boston, Massachusetts, so that he may work with his attorney to prepare his application for relief.

Respectfully Submitted by  
XXXX XXXX,  
through his attorney

\_\_\_\_\_  
Medha Devanagondi, Esq.  
PAIR Project  
254 Friend St., 5<sup>th</sup> Floor  
Boston, MA 02114

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

**UNITED STATES DEPARTMENT OF JUSTICE  
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In the Matter of: XXXX XXXX

A Number: XXX XXX XXX

**ORDER OF THE IMMIGRATION JUDGE**

Upon consideration of the respondent's Motion to Change Venue, 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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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 \_\_\_\_\_

XXXX, XXXX  
A XXX XXX XXX

## PROOF OF SERVICE

On March \_\_\_\_, 2009, I, Medha Devanagondi, served a copy of this Motion to Change Venue and any attached pages to the Office of District Counsel, Department of Homeland Security, at the following address: [\*\*INSERT DISTRICT COUNSEL'S ADDRESS. CALL COURT WHERE CASE IS PENDING FOR CORRECT ADDRESS\*\*], by **overnight mail**.

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Date