

UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
IMMIGRATION COURT

City, State

ORAL PLEADING

In order to move the large pleading calendar quickly and more efficiently, it is required that counsels/representatives follow this format and be prepared to make the following oral representations:

Upon commencement of the proceedings, the Court will recognize counsel or accredited representatives of record for the respondent. Notice of Entry of Appearance must be submitted to the Court prior to the hearing.

COUNSEL TO THE COURT:

I, (attorney/accredited representative), (state your name), on behalf of (state the name of your client), do concede proper service of a Notice to Appear dated (state date of the NTA), and (waive a formal reading thereof) or (wish to have the charging document read into the record).

I represent to the Court that I have discussed with my client the nature and purpose of these proceedings, discussed specifically the allegations of facts and the charge(s) of removability, and further advised my client of his legal rights in removal proceedings.

I further represent to the court that I have fully explained to my client the consequences of failing to appear for a removal hearing or a scheduled date of departure and the consequences of knowingly filing any frivolous applications. My client knowingly and voluntarily waives the oral notice required by INA § 240(b)(7).

As to each of these points, I am satisfied my client understands fully. On behalf of my client, he/she enters the following plea before this Court:

1. Admits allegation(s) # _____ to _____ or

Denies allegation(s) # _____ to _____.

2. Admits the charge(s) of removability or denies the charge(s) of removability.

3. Seeks the following applications for relief from removal: (state applications to include termination of proceedings).

4. Requests until (state date to be filed) to submit such applications to the Court with proper certification to the Office of the Chief Counsel, Department of Homeland Security.

5. Represents to the Court that my client is prima facie eligible for the relief stated herein.

6. Requests (time/hours) to present my client's case in chief.

7. Lastly, my client designates (state name of country) as his/her country of choice for removal if removal becomes necessary.

BY AUTHORITY OF:

Immigration Court