



**U.S. Department of Justice**

Executive Office for Immigration Review

*Board of Immigration Appeals*

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Chairman

5107 Leesburg Pike, Suite 2400  
Falls Church, Virginia 22041

May 23, 2018

**BIA 18-02**

**MEMORANDUM TO:** Board Legal Staff

**FROM:** David L. Neal  
Chairman

**SUBJECT:** CASE HOLD – *Matter of Castro-Tum*

As the result of the publication of *Matter of Castro-Tum*, 27 I&N Dec. 271 (A.G. 2018), the Board is no longer required to defer adjudication of interlocutory appeals which depended, in whole or in part, on whether administrative closure was warranted or available. 8 C.F.R. § 1003.0(b)(1)(ii).

Cases that were placed on hold pursuant to the *Matter of Castro-Tum* hold are in the process of being returned for adjudication. If you have questions regarding the circulation of cases with this issue, please see your Senior Panel Attorney or team leader.