



**U.S. Department of Justice**

Executive Office for Immigration Review

*Board of Immigration Appeals*

Chairman

5107 Leesburg Pike, Suite 2400  
Falls Church, Virginia 22041

June 29, 2018

**BIA 18-03**

**MEMORANDUM TO:** Board Legal Staff

**FROM:** David L. Neal  
Chairman

**SUBJECT:** CASE HOLD LIFTED – *Negusie v. Holder*

As the result of the publication of *Matter of Negusie*, 27 I&N Dec. 347 (BIA 2018), I am lifting the existing hold (temporary suspension of adjudication time limits) on certain cases involving the persecutor bar; specifically, whether an involuntariness or duress exception exists to limit application of the bar.

Cases that were placed on hold pursuant to the *Negusie* 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.