Attorney Name, EOIR ID NON-DETAINED

Firm/Organization

Attorney Address 1

Attorney Address 2

Telephone

UNITED STATES DEPARTMENT OF JUSTICE

EXECUTIVE OFFICE FOR IMMIGRATION REVIEW

NEW YORK -FEDERAL PLAZA IMMIGRATION COURT

NEW YORK, NEW YORK

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

In the Matter of: )

)

Lead Respondent ) A#

Rider Respondent 1 ) A#

Rider Respondent 2 ) A#

Rider Respondent 3; ) A#

In removal proceedings. )

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

Immigration Judge: NAME Next Hearing: DATE

**MOTION TO TERMINATE REMOVAL PROCEEDINGS**

UNITED STATES DEPARTMENT OF JUSTICE

EXECUTIVE OFFICE FOR IMMIGRATION REVIEW

NEW YORK – FEDERAL PLAZA IMMIGRATION COURT

NEW YORK, NEW YORK

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

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**MOTION TO TERMINATE OR IN THE ALTERNATIVE ADMINISTRATIVELY CLOSE REMOVAL PROCEEDINGS BASED ON [NAME OF PENDING APPLICATION]**

Respondent [NAME], by and through undersigned counsel, hereby moves this Honorable Court to terminate removal proceedings. Respondent presents the following reasons for her request:

1. Respondent file an [FORM, APPLICATION TYPE] with the [NAME] Service Center, receive on [DATE]. *See* Exhibit A. She also filed an I-485 Application to Adjust Status at that time. *See* Exhibit B.
2. Respondent has a [type of hearing] before the Honorable Immigration Judge [NAME] on [DATE].
3. On DATE, the [name] Service Center approved Respondent’s [Form, Application type] *See* Exhibit C.
4. Per 8 C.F.R. § 1240.12(c), an Immigration Judge can order removal proceedings to be terminated.
5. Undersigned Counsel communicate with Assistant Chief Counsel for DHS-ICE [NAME] on [DATE]. Ms [NAME] communicated that she has no objection to the termination of these proceedings.
6. Respondent does not have any criminal convictions, and the termination of proceedings will not cause prejudice to the U.S. government nor this Court.

Accordingly, because Respondent has a pending [type of application] and since opposing counsel has no objection to the termination of proceedings, and such termination will not prejudice either this Court or the U.S. government, we request that this Honorable Court grant this Motion to Terminate Removal Proceedings and that the master calendar hearing in the above-captioned matter be cancelled.

Respectfully submitted this XXth day of MONTH, 2025

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

Attorney Name, EOIR#

Tel.

Email Address

UNITED STATES DEPARTMENT OF JUSTICE

EXECUTIVE OFFICE FOR IMMIGRATION REVIEW

NEW YORK -FEDERAL PLAZA IMMIGRATION COURT

NEW YORK, NEW YORK

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In the Matter of: )

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In removal proceedings. )

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

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Exhibit B Receipt Notice for I-485 Application X

Exhibit C

--- Proposed Order X

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UNITED STATES DEPARTMENT OF JUSTICE

EXECUTIVE OFFICE FOR IMMIGRATION REVIEW

NEW YORK -FEDERAL PLAZA IMMIGRATION COURT

NEW YORK, NEW YORK

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In the Matter of: )

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Rider Respondent 3; ) A#

In removal proceedings. )

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

**ORDER OF THE IMMIGRATION JUDGE**

Upon consideration of the respondent’s Motion to Terminate Proceedings, 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 The Honorable [NAME]

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

UNITED STATES DEPARTMENT OF JUSTICE

EXECUTIVE OFFICE FOR IMMIGRATION REVIEW

NEW YORK -FEDERAL PLAZA IMMIGRATION COURT

NEW YORK, NEW YORK

In the Matter of: RESPONDENT(S) NAMES & A#S

**PROOF OF SERVICE**

On [DATE], I [NAME OF PERSON SERVING] served a copy of this **MOTION TO TERMINATE PROCEEDINGS**, and any attached pages to **ICE-OPLA,** at the following address: [see field office address] via FedEx/USPS/UPS/ECAS.

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

Signature Date