SAMPLE WORK PRODUCT — fictional matter prepared by Faveo Paralegals. Case facts and identifying details are fictional.

Reyes Ferrante Immigration Law PLLC
400 Example Way, Suite 220
Portland, ME 04101
(207) 555-0148
mreyes@example.com
EOIR XX000000
ME BAR # 00000

NON-DETAINED

UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
IMMIGRATION COURT
BOSTON, MASSACHUSETTS

In the Matter of:

VALENTINA ROJAS CASTILLO A000-000-000

In removal proceedings

Immigration Judge: [ASSIGNED JUDGE]
Master Calendar Hearing: December 7, 2026, at 8:30 a.m. Eastern Time

RESPONDENT'S MOTION FOR RESPONDENT AND COUNSEL TO APPEAR VIA WEBEX (INTERNET-BASED VIDEO HEARING)

CONTENTS

Motion 2–3
Declaration of Marisol Reyes Ferrante 4
Exhibit 1 Notice to Appear and Continuation Page (omitted) 5
Exhibit 2 Statement of Valentina Rojas Castillo 6
Exhibit 3 UNH Fall 2026 Schedule of Classes (omitted) 7
Proposed Order 8
Certificate of Service 9

Valentina Rojas Castillo A000-000-000

MOTION FOR RESPONDENT AND COUNSEL TO APPEAR VIA WEBEX

Respondent Valentina Rojas Castillo, through counsel Marisol Reyes Ferrante, respectfully requests permission for both Respondent and counsel to appear by Webex at the December 7, 2026, 8:30 a.m. hearing before the Boston Immigration Court. In support, Respondent states:

1. The Court's November 12, 2026 scheduling order retained the December 7 master calendar hearing at 8:30 a.m. for oral pleadings. See the order in the record and the October 28 Notice to Appear (Exhibit 1). For a master calendar hearing that remains scheduled, a filing seeking a ruling at or before the hearing is due 15 days ahead. EOIR Immigration Court Practice Manual, Part II, ch. 2.1(b)(1)(B). The 15th day falls on Sunday, November 22, so the deadline moves to Monday, November 23, the date of this filing. Id. ch. 2.1(c)(2)(B).

2. INA § 240(b)(2)(A)(iii), 8 U.S.C. § 1229a(b)(2)(A)(iii), authorizes removal proceedings by video conference. Under 8 C.F.R. § 1003.25(c), an Immigration Judge may conduct hearings by video conference to the same extent as in person. The Immigration Court Practice Manual, Part II, ch. 3.6(a)–(b), recognizes video hearings and allows participants to appear from separate locations. The Board has held that video proceedings do not inherently violate due process and that fairness depends on the circumstances. *Matter of R-C-R-*, 28 I&N Dec. 74, 80–81 (BIA 2020). Respondent asks the Court to exercise its discretion to authorize Webex appearances under the safeguards described below.

3. Counsel is physically located in Portland, Maine, approximately 110 miles from the Boston Immigration Court, and would participate from there. Requiring counsel to travel to Boston would entail roughly four hours of round-trip travel time and transportation expense for a master calendar hearing that remote participation would avoid. See counsel's accompanying declaration.

4. Respondent is enrolled at the University of New Hampshire in six courses totaling 16 credits for Fall 2026, August 31 through December 11. Her schedule reflects online courses and one live online Thursday seminar; it does not show a scheduled class overlapping the Monday hearing. See Exhibits 2 and 3.

5. Respondent resides in Manchester, New Hampshire, the address shown on the Notice to Appear, approximately 55 miles from the Boston Immigration Court. See Exhibit 1. An in-person appearance for an 8:30 a.m. Monday hearing would require a round trip of roughly three hours in weekday commuter traffic, with the associated parking and travel expense, for a master calendar hearing.

6. Respondent requests remote participation to avoid that travel and the resulting disruption to her full-time academic schedule. She will prioritize the hearing and remain available until excused.

7. Counsel and Respondent will use separate, quiet, private locations with tested internet, camera, microphone, and audio. They will identify all persons present, follow Court instructions, and immediately report connection problems. Counsel will arrange confidential attorney-client communication and request a recess for consultation when needed.

8. Both will be ready to proceed as scheduled. Webex will avoid the travel described above without delaying the hearing. On November 20, 2026, DHS counsel advised that DHS does not oppose either request.

9. Respondent requests a ruling before the hearing expressly authorizing both Webex appearances. In the alternative, should the Court require Respondent's personal appearance, Respondent requests that counsel alone be permitted to appear via Webex while Respondent appears in person. Unless the Court authorizes a different method or changes the hearing, both will comply with the existing appearance requirements.

WHEREFORE, Respondent respectfully requests permission for Valentina Rojas Castillo and Marisol Reyes Ferrante to appear via Webex at the December 7, 2026, 8:30 a.m. Eastern Time hearing, from separate locations, using the Court-designated connection information, or, in the alternative, permission for counsel to appear via Webex with Respondent appearing in person.

Respectfully submitted,

_____

Marisol Reyes Ferrante
Attorney for Respondent
Maine Bar No. 00000 | EOIR No. XX000000

Date: November 23, 2026

Valentina Rojas Castillo A000-000-000

DECLARATION OF MARISOL REYES FERRANTE

I, Marisol Reyes Ferrante, declare as follows:

1. I am counsel for Valentina Rojas Castillo in this matter. I submit this declaration in support of the request for both Respondent and me to participate through Webex at the December 7, 2026, hearing.

2. I am physically located in Portland, Maine and intend to participate from a private location there. My office address is 400 Example Way, Suite 220, Portland, Maine 04101.

3. An in-person appearance in Boston would require approximately four hours of round-trip travel and associated transportation expense. I seek to avoid that burden while remaining fully available to represent Respondent. I do not seek a continuance.

4. Before the hearing, I will test my video and audio equipment and internet connection, coordinate Respondent's access, and establish a separate method for confidential attorney-client communication. I will remain available throughout the hearing and comply with the Court's instructions.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on November 23, 2026, at Portland, Maine.

_____

Marisol Reyes Ferrante

EXHIBIT 1 | NOTICE TO APPEAR AND CONTINUATION PAGE | 4 PAGES

The four-page Notice to Appear and continuation page are omitted from this public sample.

Valentina Rojas Castillo A000-000-000

EXHIBIT 2
STATEMENT OF VALENTINA ROJAS CASTILLO

I, Valentina Rojas Castillo, declare as follows:

1. I am the Respondent. I request permission to attend my December 7, 2026, 8:30 a.m. hearing through Webex, with my attorney also participating through Webex.

2. I am enrolled at the University of New Hampshire for Fall 2026 in six courses totaling 16 credits. The attached schedule identifies me and lists my courses for August 31 through December 11, 2026. It is a true and correct copy of my schedule.

3. My listed courses are online. Five list no meeting days, and the live online seminar meets Thursdays from 1:00 to 3:00 p.m. My schedule does not show a class overlapping the Monday, December 7 hearing.

4. I live in Manchester, New Hampshire, about 55 miles from the Boston Immigration Court. Remote attendance would avoid a long round trip in weekday traffic and reduce disruption to my academic workload. I understand the hearing takes priority and will not attend class or perform schoolwork during the hearing. I will remain available until the Court excuses me.

5. If authorized, I will participate from a quiet, private location in Manchester, New Hampshire. Before the hearing, I will test my internet, camera, microphone, and audio with counsel. I will follow the Court's instructions and immediately report connection difficulties.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on November 23, 2026, at Manchester, New Hampshire.

_____
Valentina Rojas Castillo

EXHIBIT 3 | UNH FALL 2026 SCHEDULE OF CLASSES | 2 PAGES

The two-page registrar schedule is omitted from this public sample.

UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
IMMIGRATION COURT
BOSTON, MASSACHUSETTS

Valentina Rojas Castillo A000-000-000

PROPOSED ORDER

Upon consideration of Respondent's Motion for Respondent and Counsel to Appear via Webex at the December 7, 2026, 8:30 a.m. Eastern Time hearing, the motion is:

_____ GRANTED _____ GRANTED IN PART (counsel only) _____ DENIED

If granted, Valentina Rojas Castillo and her counsel, Marisol Reyes Ferrante, are each authorized to appear via Webex from separate locations for that hearing, using the Court-designated connection information. If granted in part, counsel is authorized to appear via Webex and Respondent shall appear in person. Any person appearing via Webex must remain available until excused and comply with all instructions regarding video, audio, identification, and confidential consultation.

The hearing date, time, venue, and existing filing deadlines remain unchanged unless otherwise ordered. This order applies only to the hearing identified above.

Additional instructions: _____

_____

_____

Date: _____

_____
United States Immigration Judge

Valentina Rojas Castillo A000-000-000

CERTIFICATE OF SERVICE

I certify that on November 23, 2026, the foregoing Motion for Respondent and Counsel to Appear via Webex, including counsel's declaration, Exhibits 1 through 3, and the proposed order, was electronically filed through ECAS in this case.

This document was electronically filed through ECAS and both parties are participating in ECAS. Therefore, no separate service was completed.

_____

Marisol Reyes Ferrante
Attorney for Respondent

Date: November 23, 2026