

UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
UNITED STATES IMMIGRATION COURT
BALTIMORE, MARYLAND

IN THE MATTER OF

[REDACTED]

(RESPONDENT)

IN REMOVAL PROCEEDINGS

At [REDACTED]

JOINT MOTION TO REOPEN AND TERMINATE PROCEEDINGS

COMES NOW INTO COURT, Respondent, [REDACTED] ("Mr. [REDACTED]"), through undersigned Counsel, and respectfully moves this Honorable Court to reopen and terminate proceedings pursuant to 8 C.F.R. § 1003.23(b)(4)(iv) so that he may apply for adjustment of status before U.S. Citizenship & Immigration Services (USCIS).

The Office of Chief Counsel for Immigration & Customs Enforcement hereby joins in this Motion to Reopen and Terminate Proceedings.

In support of this request, Mr. [REDACTED] states the following:

1. Mr. [REDACTED] is a native and citizen of The Philippines.
2. Mr. [REDACTED] entered the United States on September 23, 1982 as a nonimmigrant visitor and has since continuously resided in the United States.
3. Mr. [REDACTED] obtained this visa to travel to the United States per the recommendation of his physicians to seek medical treatment for a rare, but potentially life-threatening medical

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**United States. Office of the Chief
Immigration Judge**

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