

HS Law Corp
Otavio Haverroth Silva, SBN#343486
P.O. Box 90487
San Diego, CA 92169
(510) 241-9336

Non-Detained

UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
IMMIGRATION COURT
100 Montgomery Street, Suite 800
San Francisco, CA 94104

In the Matter of)
)
Joao Vitor Pereira Figueiredo) **File No. A. 240-406-322**
)
In Removal Proceedings)
)
)

Immigration Judge: **George, Amber D** Next Hearing Date: **September 16, 2027 at 1:30 P.M.**

RESPONDENT’S MOTION TO WITHDRAW AS COUNSEL

**UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
IMMIGRATION COURT**

100 Montgomery Street, Suite 800
San Francisco, CA 94104

)	
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In Removal Proceedings)	
)	
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RESPONDENT’S MOTION TO WITHDRAW AS COUNSEL

COMES NOW, Otavio Haverroth Silva, attorney of record for the Respondent, and respectfully requests to withdraw as counsel from the Respondent case pursuant to 8 C.F.R. § 1003.17(a)(3) and Immigration Court Practice Manual 2.1(I)(II). As grounds, the undersigned counsel states the following:

1. The Respondent is native and citizen of Brazil. The Respondent’s last known address is 401 Bermuda Drive, apt 5, San Mateo, CA, 94403.
2. Respondent retained Otavio Haverroth Silva, Esq. from HS Law, to represent him in all immigration proceedings other than custody and bond proceedings.
3. Respondent have a Master Hearing scheduled for September 16, 2027, 1:30pm.
4. Throughout the last months, our team has made several attempts to contact the Respondent via phone, letter, and e-mail, requesting his cooperation so that we could move forward with his case. Nevertheless, the breach of contract has persisted and no communication has been possible.
5. Despite Counsel’s repeated efforts to explain the importance of complying with the immigration process to the Respondent, the Respondent has ceased communication and

failed to cooperate with retained counsel, in continued disregard to the terms of the representation agreement. As a result, undersigned Counsel respectfully submits that there is no alternative but to withdraw from representation in this matter before the Immigration Court.

6. The lack of cooperation on part of the Respondent has led to a significant breakdown of communication between the undersigned and Respondent. This communication breakdown has caused an irreparable and detrimental deterioration of the attorney-client relationship as originally defined in the representation agreement between the Respondent and the undersigned counsel.

7. As a result, I am no longer able to effectively represent Mr. Joao Vitor Pereira Figueiredo. Therefore, undersigned counsel respectfully requests permission to withdraw from all proceedings regarding the Respondent case.

8. All efforts to notify the Respondent of the intent to withdraw were made, through letters and emails. *See Exhibits 1 and 2.*

9. Due to the breakdown in communication and the inability to make contact, it was not possible to obtain the Respondent consent for withdrawal.

10. Nevertheless, a courtesy copy of the entire proceedings has been properly sent to the Respondent via mail and e-mail. *See Exhibits 2 and 3.*

11. The Respondent was notified, in those communications, of the necessity to meet any deadlines and advised to seek new representation.

12. A copy of this motion was served to the Respondent by email. *See Exhibit 3.*

WHEREFORE, the undersigned counsel respectfully requests that this Honorable Court grant the motion and order the requested relief.

Respectfully Submitted,



Otavio Silva (Bar N. 343486)
Attorney at Law
P.O. Box 90487
San Diego, CA 92169

Exhibit list

Exhibits:

Pages:

Exhibit 1

Letter Notifying Respondents of Withdraw as
Counsel

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Mail Receipt for Letter Notifying Respondents of
Withdraw as Counsel

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Exhibit 2

E-mail Notifying Respondents of Withdraw as
Counsel

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Exhibit 3

E-mail serving Motion to Withdraw as Counsel

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Exhibit 1

March 18, 2026

Mr. João Vitor Pereira Figueiredo

401 Bermuda Drive, apt 5
San Mateo, CA, 94403

Dear Mr. João Vitor Pereira Figueiredo,

I hope this letter finds you well. Due to unsuccessful attempts to contact you over the past few months and your failure to fulfill contractual obligations, I am writing to formally notify you of the termination of legal representation in your case, in accordance with applicable ethical and legal regulations.

Since January of this year, we have attempted to contact you numerous times via telephone, messages, and letters regarding your case. However, we have been unsuccessful. This lack of cooperation has made it impossible to proceed with the case and provide adequate legal services on your behalf.

Given this context, there is no alternative but to terminate representation in your defensive asylum proceedings before the San Francisco Immigration Court.

I must emphasize that communication and the exchange of information between the client and the contracted team are indispensable for the proper exercise of professional representation; without them, there is a breach of trust in the attorney-client relationship. In light of this situation and the impossibility of maintaining effective communication for the proper continuation of our work, I am compelled to cease providing legal services regarding your case.

For this reason, I hereby notify you of the withdrawal of representation, formalizing the end of our professional relationship.

Please be advised that you have a **Master Hearing scheduled for September 16, 2027, at 1:30 PM, at 100 MONTGOMERY ST., SUITE 800, SAN FRANCISCO, CA 94104.**

It is imperative that you appear in person at the indicated address on the specified date and time.

Furthermore, please be aware that **if you fail to appear at the scheduled hearing, an order of removal will be issued in your name.**

In any event, it is strongly advised that you seek new legal representation to ensure your case is handled as appropriately as possible.

Enclosed with this letter, I am sending a complete copy of your file regarding the proceedings before the Immigration Court.

I remain available to provide additional information about your case and guidance on the next steps, if necessary.

Thank you for your understanding, and I wish you success in the upcoming stages.

Sincerely,



Otavio Haverroth Silva
Attorney at law SBN#343486
YOUUSA Law Firm
P.O. Box 90487
San Diego, CA 92169

18 de Março de 2026

Sr João Vitor Pereira Figueiredo

401 Bermuda Drive, apt 5
San Mateo, CA, 94403

Prezado Sr. João Vitor Pereira Figueiredo,

Espero que esta carta encontre-o bem. Venho por meio desta, diante das tentativas infrutíferas de contato ao longo dos últimos meses e do não cumprimento por sua parte das obrigações contratuais, notificá-lo do encerramento da representação legal no seu caso, conforme regulamentos éticos e legais aplicáveis.

Desde Janeiro deste ano, tentamos contatá-lo diversas vezes por telefone, mensagens e cartas para tratar sobre o seu caso. Contudo, não obtivemos sucesso. Essa ausência de colaboração impossibilitou o andamento do processo e a prestação de serviços jurídicos adequados em seu nome.

Considerando esse contexto, não há alternativa senão o encerramento da representação no seu processo de asilo defensivo junto à Corte de Imigração de São Francisco.

Destaco que a comunicação e troca de informações entre o cliente e a equipe contratada é indispensável para o adequado exercício da representação profissional, sem a qual se verifica uma quebra de confiança na relação cliente-advogado. Diante dessa situação e da impossibilidade de manter uma comunicação eficaz para a devida continuidade do nosso trabalho, vejo-me obrigado a cessar a prestação dos serviços advocatícios em relação ao seu caso.

Por essa razão, notifico por meio desta o encerramento da representação, formalizando o término da nossa relação profissional.

Lembro que você possui uma **Master Hearing agendada para o dia 16/09/2027 às 13:30h, em 100 MONTGOMERY ST., SUITE 800, SAN FRANCISCO, CA 94104.**

É imprescindível que você compareça presencialmente no endereço, no dia e horário indicados.

Destaco ainda que, **se você não comparecer à audiência agendada, será expedida uma ordem de remoção em seu nome.**

De todo modo, é extremamente aconselhado que o senhor busque obter representação processual, para que o seu caso tramite da forma mais adequada possível.

Junto a essa carta, envio uma **cópia da íntegra do seu processo junto à Corte de Imigração.**

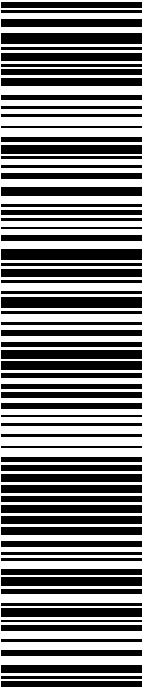
Permaneço disponível para fornecer informações adicionais sobre seu caso e orientações sobre os próximos passos, se necessário.

Agradeço pela compreensão e desejo sucesso nas próximas etapas.

Atenciosamente,




Otavio Haverroth Silva
Advogado SBN#343486
YOUUSA Law Firm
P.O. Box 90487
San Diego, CA 92169



USPS TRACKING #

9405 5301 0935 5353 2944 50



JOAO VITOR PEREIRA FIGUEIREDO
APT 5
401 BERMUDA DR
SAN MATEO CA 94403-5603

P

USPS.com 9405 5301 0935 5353 2944 50 0088 5001 0009 4403
 US POSTAGE \$8.85
 03/20/2026 1 lb 0 oz


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 OTAVIO H SILVA
 PO BOX 90487
 SAN DIEGO CA 92169-2487

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C015



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2. Adhere shipping label to package with tape or glue - DO NOT TAPE OVER BARCODE. Be sure all edges are secure. Self-adhesive label is recommended.
3. Place label so that it does not wrap around the edge of the package.
4. Each shipping label number is unique and can be used only once - DO NOT PHOTOCOPY.
5. Please use this shipping label on the "ship date" selected when you requested the label.
6. If a mailing receipt is required, present the article and Online e-Label Record at a Post Office for postmark.

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Ship Date: 2026-03-20	Extra Services:	\$0.00
	Fees:	\$0.00
	Total:	\$8.85

**From: YOU SA LAW - HS LAW
 OTAVIO H SILVA
 PO BOX 90487
 SAN DIEGO CA 92169-2487**

**To: JOAO VITOR PEREIRA FIGUEIREDO
 APT 5
 401 BERMUDA DR
 SAN MATEO CA 94403-5603**

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Exhibit 2



Liz Magda Teixeira de Almeida Seniuk <liz.seniuk@yousalaw.com>

Termination of legal representation

1 mensagem

Liz Magda Teixeira de Almeida Seniuk <liz.seniuk@yousalaw.com>

18 de março de 2026 às 14:53

Para: pereirajoavitor1015@gmail.com

Cc: Ananda Oliveira <ananda@yousalaw.com>, Maria Luiza Dalsenter <maria.luiza@yousalaw.com>

Dear Mr. João Vitor Pereira Figueiredo,

I hope this letter finds you well. Due to unsuccessful attempts to contact you over the past few months and your failure to fulfill contractual obligations, I am writing to formally notify you of the termination of legal representation in your case, in accordance with applicable ethical and legal regulations.

Since January of this year, we have attempted to contact you numerous times via telephone, messages, and letters regarding your case. However, we have been unsuccessful. This lack of cooperation has made it impossible to proceed with the case and provide adequate legal services on your behalf.

Given this context, there is no alternative but to terminate representation in your defensive asylum proceedings before the San Francisco Immigration Court.

I must emphasize that communication and the exchange of information between the client and the contracted team are indispensable for the proper exercise of professional representation; without them, there is a breach of trust in the attorney-client relationship. In light of this situation and the impossibility of maintaining effective communication for the proper continuation of our work, I am compelled to cease providing legal services regarding your case.

For this reason, I hereby notify you of the withdrawal of representation, formalizing the end of our professional relationship.

Please be advised that you have a **Master Hearing scheduled for September 16, 2027, at 1:30 PM, at 100 MONTGOMERY ST., SUITE 800, SAN FRANCISCO, CA 94104.**

It is imperative that you appear in person at the indicated address on the specified date and time.

Furthermore, please be aware that **if you fail to appear at the scheduled hearing, an order of removal will be issued in your name.**

In any event, it is strongly advised that you seek new legal representation to ensure your case is handled as appropriately as possible.

Enclosed with this letter, I am sending a complete copy of your file regarding the proceedings before the Immigration Court.

I remain available to provide additional information about your case and guidance on the next steps, if necessary.

Thank you for your understanding, and I wish you success in the upcoming stages.

Sincerely, _____

Prezado Sr. João Vitor Pereira Figueiredo,

Espero que esta carta encontre-o bem. Venho por meio desta, diante das tentativas infrutíferas de contato ao longo dos últimos meses e do não cumprimento por sua parte das obrigações contratuais, notificá-lo do encerramento da representação legal no seu caso, conforme regulamentos éticos e legais aplicáveis.

Desde Janeiro deste ano, tentamos contatá-lo diversas vezes por telefone, mensagens e cartas para tratar sobre o seu caso. Contudo, não obtivemos sucesso. Essa ausência de colaboração impossibilitou o andamento do processo e a prestação de serviços jurídicos adequados em seu nome.

Considerando esse contexto, não há alternativa senão o encerramento da representação no seu processo de asilo defensivo junto à Corte de Imigração de São Francisco.

Destaco que a comunicação e troca de informações entre o cliente e a equipe contratada é indispensável para o adequado exercício da representação profissional, sem a qual se verifica uma quebra de confiança na relação cliente-advogado. Diante dessa situação e da impossibilidade de manter uma comunicação eficaz para a devida continuidade do nosso trabalho, vejo-me obrigado a cessar a prestação dos serviços advocatícios em relação ao seu caso.

Por essa razão, notifico por meio desta o encerramento da representação, formalizando o término da nossa relação profissional.

Lembro que você possui uma **Master Hearing agendada para o dia 16/09/2027 às 13:30h, em 100 MONTGOMERY ST., SUITE 800, SAN FRANCISCO, CA 94104.**

É imprescindível que você compareça presencialmente no endereço, no dia e horário indicados.

Destaco ainda que, **se você não comparecer à audiência agendada, será expedida uma ordem de remoção em seu nome.**

De todo modo, é extremamente aconselhado que o senhor busque obter representação processual, para que o seu caso tramite da forma mais adequada possível.

Junto a essa carta, envio uma **cópia da íntegra do seu processo junto à Corte de Imigração.**

Permaneço disponível para fornecer informações adicionais sobre seu caso e orientações sobre os próximos passos, se necessário.

Agradeço pela compreensão e desejo sucesso nas próximas etapas.

Atenciosamente,



Liz Seniuk
Case Manager
📞 1 (510) 714-0100


 **1927733_20260318123705367.pdf**
4703K

Exhibit 3



Liz Magda Teixeira de Almeida Seniuk <liz.seniuk@yousalaw.com>

Motion to withdraw as counsel

1 mensagem

Liz Magda Teixeira de Almeida Seniuk <liz.seniuk@yousalaw.com>

25 de março de 2026 às 16:12

Para: pereirajoavitor1015@gmail.com

Cc: Ananda Oliveira <ananda@yousalaw.com>

Dear Mr. João Vitor Pereira Figueiredo,

I hope this message finds you well.

As emphasized in all previous letters and emails we have sent, please find attached the **Motion to Withdraw as Counsel**, a document that formalizes the request to withdraw representation before the Immigration Court.

Please be reminded that:

Your next Master Hearing will be held in person on September 16, 2027, at 1:30 PM.

Immigration Judge: Amber D. George

Court Address:

100 Montgomery St., Suite 800

San Francisco, CA 94104

It is very important that you attend this hearing on time and continue to keep the Immigration Court informed of any change of address. Failure to appear at the hearing or to receive notifications may result in a removal order being issued in your absence.

We strongly recommend that you seek and retain a new attorney as soon as possible so that you have professional legal assistance in preparing for the hearing and complying with all case deadlines.

I am also attaching, once again, a full copy of your case file (eROP).

If you have any questions regarding the content of this document or the next steps, please do not hesitate to contact us.

Sincerely,

Liz Seniuk

Prezado Sr João Vitor Pereira Figueiredo,

Espero que esta mensagem o encontre bem.

Conforme enfatizado em todas as cartas e e-mails que encaminhamos anteriormente, encaminho em anexo a **Motion to Withdraw as Counsel**, documento que formaliza o pedido de retirada de representação perante o Tribunal de Imigração.

Lembramos que:

- **Sua próxima Master Hearing será presencial no dia 16 de Setembro de 2027 às 1:30PM.**
- **Juiz de Imigração:** George, Amber D
- **Endereço da Corte:**
100 MONTGOMERY ST., SUITE 800
SAN FRANCISCO, CA 94104

É muito importante que o senhor compareça a essa audiência pontualmente e que continue atualizando a Corte de Imigração sobre qualquer mudança de endereço. A falta de comparecimento à audiência ou de recebimento das notificações pode resultar em uma ordem de remoção proferida na sua ausência.

Recomendamos fortemente que o senhor procure e contrate um novo advogado o quanto antes, para que tenha assistência jurídica profissional na preparação para a audiência e no cumprimento de todos os prazos do processo.

Estou mandando também em anexo, novamente, cópia da íntegra do seu processo.

Caso tenha alguma dúvida sobre o conteúdo do documento ou sobre os próximos passos, por favor, entre em contato.


Atenciosamente,




Liz Seniuk
Case Manager

📞 1 (510) 714-0100

2 anexos

 **Motion to withdraw.pdf**
226K

 **1927733_20260318123705367.pdf**
4703K

Proof of Service

On this day, I, Otavio Haverroth Silva, served a copy of the following documents:

RESPONDENT'S MOTION TO WITHDRAW AS COUNSEL

To the following:

Office Location:	Mailing Address:
Office of Chief Counsel Department of Homeland Security 100 Montgomery St, Suite 200 San Francisco, CA 94104	U.S. Immigration and Customs Enforcement U.S. Department of Homeland Security Office of the Chief Counsel P.O. Box 26449 San Francisco, CA 94126-6449

by:

- Through the EOIR Courts and Appeals System (ECAS), which will automatically send service notification to both parties that a new document has been filed.



Otavio Silva (Bar N. 343486)
Attorney at Law
P.O. Box 90487
San Diego, CA 92169
Counsel for Respondent