

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

290 Broadway, 15th Flr
New York, NY 10007

In the Matter of)

Franklin Sebastian Sacancela Mayancela)

In Removal Proceedings)

File No. A. 201-606-776

Immigration Judge: Xu, ShaSha

Next Hearing Date: April 23, 2026, at 8:30 AM.

RESPONDENT'S MOTION FOR CONTINUANCE

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The undersigned counsel hereby respectfully requests a continuance of the upcoming Master Hearing currently scheduled for April 23, 2026, and in support states the following:

1. Undersigned counsel was only recently retained to represent Respondent in these proceedings. A Notice of Entry of Appearance (Form EOIR-28) and a Motion to Substitute Counsel were filed concurrently herewith on April 16, 2026.
2. Prior to undersigned counsel's involvement, Respondent was represented by prior counsel, Leiny Ruiz (Bar #1035623), who has since filed a Motion to Withdraw as Counsel with this Court. Undersigned counsel has not yet had an opportunity to obtain and review the full Record of Proceedings or any documents previously submitted on Respondent's behalf.
3. Respondent has viable grounds to seek lawful status in the United States. Respondent is the beneficiary of an approved Special Immigrant Juvenile

Status (SIJS), Receipt Number MSC2390117956. In light of this approved status, Respondent intends to file a Motion to Terminate Removal Proceedings, along with supporting evidence and documentation.

A continuance is warranted to allow undersigned counsel sufficient time to: (1) obtain and review the full Record of Proceedings; (2) gather and organize supporting documentation; and (3) prepare and file the Motion to Terminate Removal Proceedings along with any additional applications for relief.

Additional time will ensure that all filings and supporting evidence are submitted in a thorough and accurate manner, thereby promoting fairness and due process in these proceedings. This Motion is filed in good faith and not for the purpose of delay.

Under 8 C.F.R. § 1003.29, a continuance may be granted for good cause shown. The recent substitution of counsel and the existence of an approved basis for relief collectively constitute good cause for the requested continuance.

Respectfully,



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

Proof of Service

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

RESPONDENT'S MOTION FOR CONTINUANCE

To the following:

Office Location:	Mailing Address:
Office of the Principal Legal Advisor Department of Homeland Security 26 Federal Plaza, Room 1130 New York, NY 10278	US Immigration and Customs Enforcement US Department of Homeland Security Office of the Principal Legal Advisor 26 Federal Plaza, Room 1130 New York, NY 10278

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