

**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**  
915 2nd Avenue, Suite 613  
Seattle, WA 98174

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**In the Matter of** )  
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 )  
**Raiano Maciel Moreira Grande** ) **File No. A. 226-014-829**  
 )  
**In Removal Proceedings** )  
 )  
 )  

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Immigration Judge: **Sogabe, Kenneth**      Next Hearing Date: **October 18, 2028 at 1 p.m.**

**RESPONDENT’S MOTION TO WITHDRAW AS COUNSEL**

**UNITED STATES DEPARTMENT OF JUSTICE  
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW  
IMMIGRATION COURT  
915 2nd Avenue, Suite 613  
Seattle, WA 98174**

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<b>In the Matter of</b>	)	
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<b>Raiano Maciel Moreira Grande</b>	)	<b>File No. A. 226-014-829</b>
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	)	
	)	

**RESPONDENT’S MOTION TO WITHDRAW AS COUNSEL**

**COMES NOW**, Otavio Haverroth Silva, Esq., attorney of record for the Respondent, and respectfully requests leave of this Honorable Court to withdraw as counsel of record pursuant to 8 C.F.R. § 1003.17(b) and EOIR Policy Manual, Part I, Chapter 5.4 (Changes in Representation). In support thereof, and consistent with the standards set forth in *Matter of Rosales*, 19 I&N Dec. 655 (BIA 1988), the undersigned counsel states as follows:

1. The Respondent, Raiano Maciel Moreira Grande, is a native and citizen of Brazil currently in removal proceedings before the Seattle Immigration Court, under A-Number 226-014-829. Respondent retained Otavio Haverroth Silva, Esq. of HS Law Corp to represent him in all immigration proceedings other than custody and bond proceedings. The Respondent’s last known address is 15811 180th Ave NE, Woodinville, WA 98072.

2. The procedural posture of this case is as follows. Respondent remains in removal proceedings before the Seattle Immigration Court. The next scheduled hearing is a Master Calendar Hearing set for October 18, 2028. There is no Individual Hearing date, no pending application for relief, and no imminent briefing deadline. The substantial time remaining before the next hearing ensures that Respondent will have a full and adequate opportunity to secure new counsel without any procedural prejudice to his case.

3. Good cause exists for withdrawal based on a total and irreparable breakdown of the attorney-client relationship. Beginning in May 2025, undersigned counsel and office staff made repeated attempts to contact the Respondent by telephone and text message to discuss the progress of his case. Those efforts were wholly unsuccessful. Notwithstanding Respondent's failure to cooperate, counsel continued to act in his interest, including filing a Motion to Terminate removal proceedings based on the approved Form I-360 SIJS petition, which was denied by Immigration Judge Sogabe on February 17, 2026. Despite that critical development and continued outreach efforts, the Respondent remained unreachable.

4. On March 11, 2026, undersigned counsel formally notified the Respondent by electronic mail of the termination of legal representation, transmitting a complete copy of the Respondent's case file (eROP) and expressly urging him to retain new counsel. *See* Exhibit 1. On March 12, 2026, a final written notice of termination was additionally sent via USPS Priority Mail to the Respondent's last known address at 15811 180th Ave NE, Woodinville, WA 98072. That correspondence was returned as undeliverable on March 16, 2026, stamped "Attempted – Not Known / Unable to Forward / Return to Sender," confirming that the Respondent has relocated without notifying counsel's office. *See* Exhibit 2; Exhibit 3.

5. The foregoing efforts are fully documented and submitted herewith. On April 22, 2026, undersigned counsel made a final attempt to contact the Respondent by transmitting this motion by electronic mail to raianomoreira27@gmail.com, together with a complete copy of the case file (eROP), and reiterating the upcoming hearing date, the importance of appearing before the Court, and the urgent need to retain new counsel. *See* Exhibit 3.

6. The Respondent's consent to this withdrawal could not be obtained due to his complete and sustained unavailability. As documented above, all known means of communication have been exhausted without response, none of which produced any reply. Where a respondent has severed all contact with counsel and cannot be located despite diligent efforts, the absence of express consent does not preclude the granting of withdrawal. Continuing to serve as attorney of record under these circumstances would be inconsistent with the undersigned's ethical obligations and would constitute a fiction of representation rather than its substance.

7. Granting this motion will not prejudice the Government. The case remains at the Master Calendar stage, with no individual hearing scheduled and no pending dispositive filings. DHS has been electronically served with all documents throughout these proceedings and is fully apprised of the case status. No government interest is impaired by the withdrawal of counsel at this procedural stage.

8. The Respondent was advised therein of the next scheduled Master Calendar Hearing on October 18, 2028, before Immigration Judge Sogabe at 915 2nd Avenue, Suite 613, Seattle, WA 98174, of the importance of appearing at all scheduled hearings and updating his address with the

Court, and of the urgent need to retain new counsel to avoid proceeding unrepresented and the risk of a removal order being issued in absentia.

9. For the foregoing reasons, good cause has been established for the granting of this motion consistent with the standards of *Matter of Rosales*, 19 I&N Dec. 655 (BIA 1988): the Respondent will not be prejudiced by the withdrawal given the substantial time remaining before the next hearing; the Government will suffer no prejudice; counsel has made all reasonable efforts to notify and locate the Respondent; and continued representation is impossible in the absence of any communication.

**WHEREFORE**, the undersigned counsel respectfully requests that this Honorable Court grant this Motion and permit withdrawal as counsel of record in the above-captioned proceedings.

Respectfully Submitted,



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

# Exhibit list

Exhibits:

Pages:

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## **Exhibit 1**

E-mail Notifying Respondent of Withdraw as Counsel 1-3

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## **Exhibit 2**

Letter Notifying Respondent of Withdraw as Counsel 4-7

Mail Receipt for Letter Notifying Respondent of Withdraw as Counsel 8

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## **Exhibit 3**

E-mail serving Motion to Withdraw as Counsel 9-10

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# **Exhibit 1**



Liz Magda Teixeira de Almeida Seniuk &lt;liz.seniuk@yousalaw.com&gt;

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## Notice of Termination of Legal Representation - Immigration Court

1 mensagem

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

11 de março de 2026 às 17:23

Para: raianomoreira27@gmail.com

Cc: Ananda Oliveira &lt;ananda@yousalaw.com&gt;, Maria Luiza Dalsenter &lt;maria.luiza@yousalaw.com&gt;

Dear Mr. Raiano Maciel Moreira Grande,

I hope this letter finds you well.

I am writing to formally notify you of the termination of our legal representation in your case, due to unsuccessful attempts to contact you over the past several months and your failure to comply with your contractual obligations, in accordance with the applicable ethical and legal rules.

Since May of last year, we have made several attempts to contact you by phone and text message to discuss your case. However, we were unsuccessful. This lack of communication and cooperation has made it impossible to properly move your case forward and to provide effective legal services on your behalf.

Please note that, despite your lack of communication and cooperation, our office still attempted to take measures to benefit your case, including filing a *Motion to Terminate* before the Immigration Court based on the approval of your SIJS. However, that motion was denied by the Immigration Judge and you remain in removal proceedings.

Given these circumstances, we have no alternative but to terminate our representation in your proceedings before the Seattle Immigration Court.

Please understand that communication and the exchange of information between the client and retained counsel are essential to the proper exercise of legal representation. Without such communication, there is a breakdown in the attorney-client relationship and in the trust necessary for continued representation. Under these circumstances, and due to the impossibility of maintaining effective communication for the proper continuation of our work, I am compelled to cease providing legal services in your case.

For this reason, this letter serves as formal notice that our representation has ended, thereby concluding our professional relationship.

In any event, it is strongly advisable that you seek representation from another attorney so that your case may proceed in the most appropriate manner possible.

Enclosed with this letter is a complete copy of your case file (*eROP*).

We remain available to provide additional information about your case and guidance regarding next steps, if necessary.

Thank you for your understanding, and I wish you success in the next stages of your matter.

Sincerely,

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**Prezado Sr. Raiano Maciel Moreira Grande,**

Espero que esta carta o encontre 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 em seu caso, em conformidade com os regulamentos éticos e legais aplicáveis.

Desde maio do ano passado, tentamos contatá-lo diversas vezes por telefone e por mensagens para tratar do andamento do seu caso. Contudo, não obtivemos sucesso. Essa ausência de comunicação e de colaboração impossibilitou o adequado andamento do processo e a prestação de serviços jurídicos de forma efetiva em seu nome.

Ressalto que, apesar da ausência de colaboração e comunicação de sua parte, este escritório ainda buscou adotar medidas para beneficiar o andamento do seu caso, inclusive com o protocolo de uma *Motion to Terminate* perante a Corte de Imigração, com fundamento na aprovação do seu SIJS. Referida moção, contudo, foi indeferida pelo Juiz de Imigração e você continua em processo de remoção.

Considerando esse contexto, não há alternativa senão o encerramento da representação em seu processo perante a Corte de Imigração de Seattle.

Destaco que a comunicação e a troca de informações entre o cliente e a equipe contratada são indispensáveis para o adequado exercício da representação profissional, sem as quais ocorre 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.

De todo modo, é extremamente aconselhável que o senhor busque representação processual por meio de outro advogado, para que o seu caso tenha o andamento mais adequado possível.

Junto a esta carta, envio uma cópia integral do seu processo (*eROP*).

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


Agradeço pela compreensão e desejamos sucesso nas próximas etapas.

Atenciosamente,



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

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 **3841322\_20260311155304793.pdf**  
5377K

# **Exhibit 2**

March 11 2026  
Raiano Maciel Moreira Grande  
115811 180th Ave NE,  
Woodinville WA, 98072  
raianomoreira27@gmail.com

**Dear Mr. Raiano Maciel Moreira Grande,**

I hope this letter finds you well.

I am writing to formally notify you of the termination of our legal representation in your case, due to unsuccessful attempts to contact you over the past several months and your failure to comply with your contractual obligations, in accordance with the applicable ethical and legal rules.

Since May of last year, we have made several attempts to contact you by phone and text message to discuss your case. However, we were unsuccessful. This lack of communication and cooperation has made it impossible to properly move your case forward and to provide effective legal services on your behalf.

Please note that, despite your lack of communication and cooperation, our office still attempted to take measures to benefit your case, including filing a *Motion to Terminate* before the Immigration Court based on the approval of your SIJS. However, that motion was denied by the Immigration Judge.

Given these circumstances, we have no alternative but to terminate our representation in your proceedings before the Seattle Immigration Court.

Please understand that communication and the exchange of information between the client and retained counsel are essential to the proper exercise of legal representation. Without such communication, there is a breakdown in the attorney-client relationship and in the trust necessary for continued representation. Under these circumstances, and due to the impossibility of maintaining effective communication for the proper continuation of our work, I am compelled to cease providing legal services in your case.

For this reason, this letter serves as formal notice that our representation has ended, thereby concluding our professional relationship.

In any event, it is strongly advisable that you seek representation from another attorney so that your case may proceed in the most appropriate manner possible.

Enclosed with this letter is a complete copy of your case file (*eROP*).

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

Thank you for your understanding, and I wish you success in the next stages of your matter.

**Sincerely,**



**Otavio Haverroth Silva**

Advogado SBN#343486

YOUUSA Law Firm

P.O. Box 90487

San Diego, CA 92169

11 Março 2026  
Raiano Maciel Moreira Grande  
115811 180th Ave NE,  
Woodinville WA, 98072  
raianomoreira27@gmail.com

**Prezado Sr. Raiano Maciel Moreira Grande,**

Espero que esta carta o encontre 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 em seu caso, em conformidade com os regulamentos éticos e legais aplicáveis.

Desde maio do ano passado, tentamos contactá-lo diversas vezes por telefone e por mensagens para tratar do andamento do seu caso. Contudo, não obtivemos sucesso. Essa ausência de comunicação e de colaboração impossibilitou o adequado andamento do processo e a prestação de serviços jurídicos de forma efetiva em seu nome.

Ressalto que, apesar da ausência de colaboração e comunicação de sua parte, este escritório ainda buscou adotar medidas para beneficiar o andamento do seu caso, inclusive com o protocolo de uma *Motion to Terminate* perante a Corte de Imigração, com fundamento na aprovação do seu SIJS. Referida moção, contudo, foi indeferida pelo(a) Juiz(a) de Imigração.

Considerando esse contexto, não há alternativa senão o encerramento da representação em seu processo perante a Corte de Imigração de Seattle.

Destaco que a comunicação e a troca de informações entre o cliente e a equipe contratada são indispensáveis para o adequado exercício da representação profissional, sem as quais ocorre 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.

De todo modo, é extremamente aconselhável que o senhor busque representação processual por meio de outro advogado, para que o seu caso tenha o andamento mais adequado possível.

Junto a esta carta, envio uma cópia integral do seu processo (*eROP*).

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

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# **Exhibit 3**



Liz Magda Teixeira de Almeida Seniuk &lt;liz.seniuk@yousalaw.com&gt;

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## Motion to withdraw as counsel

1 mensagem

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

22 de abril de 2026 às 17:06

Para: raianomoreira27@gmail.com

Cc: Ananda Oliveira &lt;ananda@yousalaw.com&gt;, Rafaela Teixeira Silva &lt;rafaela.teixeira@yousalaw.com&gt;

Dear Mr. Raiano,

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** October 18, 2028 at 1:00 PM.

Immigration Judge: Sogabe, Kenneth

**Court Address:**

915 2ND AVENUE, SUITE 613  
SEATTLE, WA 98174

**It is very important that you attend this hearing on time and inform the Immigration Court of your 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

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Prezado Sr Raiano,

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 18 de Outubro de 2028 at 1:00 PM.**
- **Juiz de Imigração:** Sogabe, Kenneth
- **Endereço da Corte:**  
915 2ND AVENUE, SUITE 613  
SEATTLE, WA 98174

É muito importante que o senhor compareça a essa audiência pontualmente e que atualize imediatamente a Corte de Imigração sobre sua 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

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## 2 anexos

 **Motion to withdraw Raiano.docx (1).pdf**  
142K

 **eROP Raiano Maciel Moreira Grande.pdf**  
5377K

**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:

<b>Office Location:</b>  Office of the Principal Legal Advisor Department of Homeland Security Fallon Federal Building 31 Hopkins Plaza, Room 1600 Baltimore, MD 21201	<b>Mailing Address:</b>  Office of the Principal Legal Advisor Department of Homeland Security Fallon Federal Building 31 Hopkins Plaza, Room 1600 Baltimore, MD 21201
--	--

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.



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