

**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) **File No. A. 201-606-776**
)
In Removal Proceedings)
)
_____)

Immigration Judge: Xu, ShaSha

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

MOTION FOR SUBSTITUTION OF COUNSEL

**UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
IMMIGRATION COURT
290 Broadway, 15th Flr
New York, NY 10007**

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In the Matter of)	
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Franklin Sebastian Sacancela Mayancela)	File No. A. 201-606-776
)	
In Removal Proceedings)	
)	
_____)	

MOTION FOR SUBSTITUTION OF COUNSEL

Respondent Franklin Sebastian Sacancela Mayancela, by and through undersigned counsel, respectfully moves this Honorable Court to permit substitution of counsel pursuant to 8 C.F.R. § 1003.17(a)(3) and the Immigration Court Practice Manual, Chapter 2.1(b)(3)(B). In support, Respondent states:

1. This matter is currently pending before the New York Immigration Court. Respondent's Master Calendar Hearing is scheduled for April 23, 2026, at 8:30 AM.
2. Attorney Leiny Ruiz Bar #1035623 is currently listed as counsel of record in this matter. Ms. Ruiz was retained by Respondent during his initial detention in Buffalo, New York. Since that time, Ms. Ruiz has not actively represented Respondent in these proceedings. Respondent has since retained Otavio Haverroth Silva of HS Law Corp, who is able, willing, and prepared to represent Respondent before this Court.
3. Respondent respectfully requests that the Court substitute counsel of record and recognize Otavio Haverroth Silva, counsel at HS Law Corp, as new counsel of record in this matter.
4. Respondent has contacted Ms. Leiny Ruiz and informed her of his decision to retain new counsel. Undersigned counsel served Ms. Ruiz with a copy of this Motion to Substitute Counsel via electronic mail on 15 April, 2026. In

her response, Ms. Ruiz confirmed receipt of this correspondence and provided a copy of the Motion to Withdraw as Counsel that she had already filed with the Court. *See* Exhibit 2-3. Respondent respectfully requests that the Court relieve Ms. Ruiz as counsel of record and recognizes Mr. Otavio Haverroth Silva in her place.

5. The Notice of Entry of Appearance as Attorney (Form EOIR-28) for attorney Otavio Haverroth Silva is filed concurrently with this Motion.
6. Respondent consents to the substitution of counsel requested herein. *See* Exhibit 1.

WHEREFORE, Respondent respectfully requests that the Court grant this Motion and recognize Otavio Haverroth Silva as counsel of record in this matter, and relieve prior counsel of record.

Respectfully Submitted,



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

Exhibit list

Exhibits:

Pages:

Exhibit 1

Respondent's Declaration and Consent to Substitute Counsel
1-2

Exhibit 2

Prior Counsel's Email Correspondence and Agreement to Withdraw
3-4

Exhibit 3

Motion to Withdraw as Counsel Filed by Prior Counsel Leiny Ruiz
5-17

Exhibit 1

RESPONDENT’S CONSENT TO SUBSTITUTION OF COUNSEL

I, Franklin Sebastian Sacancela Mayancela (A# 201-606-776), am the Respondent in removal proceedings pending before the New York Immigration Court.

I consent to the substitution of counsel in my proceedings. I request that Otavio H. Silva be substituted as my attorney of record for all proceedings other than custody and bond proceedings.

/Signature/

FRANKLIN SEBASTIAN SACANCELA MAYANCELA

Date: 04/10/2026

I, André Vinicius Inacio Penna Mello, telephone number 415 425-2508, mailing address P.O. Box 90487, San Diego, CA 92169, certify that the professional translation of this document from Spanish to English has been performed by myself, a qualified translator fluent in both languages, and that the following is an accurate and complete translation of the document.



André Vinicius Inacio Penna Mello

Date: April 10, 2026

CONSENTIMIENTO DEL RESPONDENTE A LA SUSTITUCIÓN DE ABOGADO

Yo, Franklin Sebastian Sacancela Mayancela (A# 201-606-776), soy el Respondente en el proceso de remoción pendiente ante la Corte de Inmigración de New York.

Consiento la sustitución de abogado en mi proceso. Solicito que Otavio H. Silva sea sustituido como mi abogado de registro en todas las actuaciones del proceso, excepto en los procedimientos de custodia y fianza.

Handwritten signature of Franklin in black ink.

FRANKLIN SEBASTIAN SACANCELA MAYANCELA

Fecha: 04/10/2026

Exhibit 2



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

Matter of Franklin Sebastian Sacancela Mayancela — Notice of Motion to Substitute Counsel

2 mensagens

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

15 de abril de 2026 às 17:55

Para: leiny@nlfpllc.com

Cc: Ananda Oliveira <ananda@yousalaw.com>, Thais Oliveira <thais.oliveira@yousalaw.com>, Rafaela Teixeira Silva <rafaela.teixeira@yousalaw.com>

Dear Ms. Ruiz,

I am reaching out on behalf of Dr. Otavio Haverroth Silva, attorney at HS Law Corp, who has been retained by Franklin Sebastian Sacancela Mayancela to represent him in his removal proceedings currently pending before the New York Immigration Court.

It is our understanding that you are currently listed as counsel of record in this matter. Mr. Sacancela has informed us that he has been in contact with you regarding his decision to retain new counsel, and that you have indicated your agreement to withdraw from the case.

Please find enclosed herewith a copy of the Motion to Substitute Counsel that will be filled in this matter.

We respectfully request that you:

1. File a Motion to Withdraw as Counsel (Form EOIR-26) with the New York Immigration Court at your earliest convenience; and
2. Confirm receipt of this communication by return email.

Please note that Respondent's Master Calendar Hearing is scheduled for April 23, **2026**. Your prompt attention to this matter is greatly appreciated, as it will allow us to avoid any procedural complications before the Court.

Should you have any questions or concerns, please do not hesitate to contact us.

Thank you for your cooperation and professional courtesy in this matter.

Respectfully,

Liz Seniuk

Liz Seniuk
Case Manager

1 (510) 714-0100

**Motion for substitution of Counsel.pdf**

164K

Leiny Ruiz <leiny@nlfpllc.com>

15 de abril de 2026 às 19:15

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

Cc: Ananda Oliveira <ananda@yousalaw.com>, Thais Oliveira <thais.oliveira@yousalaw.com>, Rafaela Teixeira Silva <rafaela.teixeira@yousalaw.com>

Good evening,

I am confirming receipt of the email and attaching my Motion to Withdraw. I have uploaded it to ECAS.

Let me know what information you need. Thanks.

Leiny Ruiz, Esq.
Neuhauser Law PLLC
64-25 Central Avenue
Glendale, NY 11385
Tel: 718-437-6000
Fax: 347-521-3033

The information contained in (and attached to) this e-mail is intended only for the personal and confidential use of the designated recipient(s) named above. This message may be an attorney/client communication and as such is privileged and confidential. If the reader of this message is not the intended recipient, you are hereby notified that you have received this document in error and that any review, dissemination, distribution or copying of this message is strictly prohibited. If you received this communication in error, please notify us immediately by reply e-mail, and delete the original message (including attachments).

From: Liz Magda Teixeira de Almeida Seniuk <liz.seniuk@yousalaw.com>
Sent: Wednesday, April 15, 2026 4:55 PM
To: Leiny Ruiz <leiny@nlfpllc.com>
Cc: Ananda Oliveira <ananda@yousalaw.com>; Thais Oliveira <thais.oliveira@yousalaw.com>; Rafaela Teixeira Silva <rafaela.teixeira@yousalaw.com>
Subject: Matter of Franklin Sebastian Sacancela Mayancela — Notice of Motion to Substitute Counsel

[Texto das mensagens anteriores oculto]


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250K

Exhibit 3

NEUHAUSER LAW, PLLC
Leiny Ruiz, Esq.
64-25 Central Avenue, 2nd Fl.
Glendale, NY 11385
Ph: 718-437-6000

NOT DETAINED

**UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
NEW YORK IMMIGRATION COURT
290 BROADWAY**

----- X
In the Matter of)
)
)
SACANCELA-MAYANCELA, FRANKLIN)
Respondent,)
)
)
In Removal Proceedings)
----- X

A: 201-606-776

IMMIGRATION JUDGE:
Xu, ShaSha

MASTER HEARING:
April 23, 2026

MOTION TO WITHDRAW AS COUNSEL

UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
NEW YORK IMMIGRATION COURT
290 BROADWAY

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In the Matter of)	
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SACANCELA-MAYANCELA, FRANKLIN)	A: 201-606-776
Respondent,)	
)	
In Removal Proceedings)	
-----	X	
IMMIGRATION JUDGE:		MASTER HEARING:
Xu, ShaSha		April 23, 2026

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TAB A

**UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
NEW YORK IMMIGRATION COURT
290 BROADWAY**

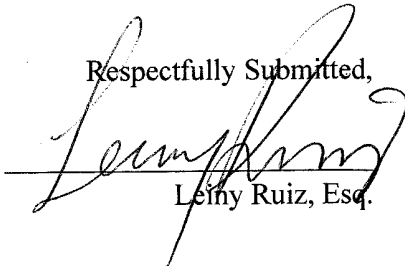
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Respondent,)	
)	
)	
In Removal Proceedings)	
----- X	X	
IMMIGRATION JUDGE:		MASTER HEARING:
Xu, ShaSha		April 23, 2026

MOTION TO WITHDRAW AS COUNSEL

COMES NOW, the undersigned counsel, Leiny Ruiz, Esq. from Neuhauser Law, PLLC, and hereby files this Motion to Withdraw as counsel for the Respondent, and in support thereof states as follows:

1. The Respondent currently has a pending matter before this Honorable Court.
2. Leiny Ruiz, Esq. from Neuhauser Law, PLLC respectfully seeks leave of Court to withdraw as counsel for the Respondent due to the Respondent hiring new counsel, HS Law Corp., to represent him. A Motion to Substitute Counsel will be filed by new Counsel.
3. In light of the foregoing, good cause exists for the undersigned counsel to be permitted to withdraw from further representation in this matter.
4. Granting this Motion will not result in prejudice to the Government, as the Respondent is represented by new counsel.

WHEREFORE, Leiny Ruiz, Esq. from Neuhauser Law, PLLC respectfully requests that this Honorable Court enter an Order granting this Motion to Withdraw as counsel for the Respondent and for any further relief the Court deems just and proper.

Respectfully Submitted,

Leiny Ruiz, Esq.

TAB B

TAB C

**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
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Immigration Judge: Xu, ShaSha

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

MOTION FOR SUBSTITUTION OF COUNSEL

**UNITED STATES DEPARTMENT OF JUSTICE
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Respondent Franklin Sebastian Sacancela Mayancela, by and through undersigned counsel, respectfully moves this Honorable Court to permit substitution of counsel pursuant to 8 C.F.R. § 1003.17(a)(3) and the Immigration Court Practice Manual, Chapter 2.1(b)(3)(B). In support, Respondent states:

1. This matter is currently pending before the New York Immigration Court. Respondent's Master Calendar Hearing is scheduled for April 23, 2026, at 8:30 AM.
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4. Respondent has contacted Ms. Leiny Ruiz and informed her of his decision to retain new counsel. Ms. Leiny Ruiz has indicated that she will withdraw from the case. Respondent respectfully requests that the Court relieve Ms.

Ruiz as counsel of record and recognize Mr. Otavio Haverroth Silva in her place.

5. The Notice of Entry of Appearance as Attorney (Form EOIR-28) for attorney Otavio Haverroth Silva is filed concurrently with this Motion.
6. Respondent consents to the substitution of counsel requested herein. *See* Exhibit 1 (Respondent's Consent to Substitute Counsel).

WHEREFORE, Respondent respectfully requests that the Court grant this Motion and recognize Otavio Haverroth Silva as counsel of record in this matter, and relieve prior counsel of record.

Respectfully Submitted,



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 TO SUBSTITUTE COUNSEL

To the following:

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

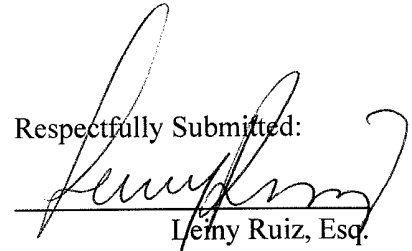
TAB D

PROOF OF SERVICE

I, HEREBY CERTIFY that on this 15th day of April, 2026 I, Leiny Ruiz, Esq., served a copy of this Motion to Withdraw as Counsel and any attached pages to DHS via ECAS. No other service is necessary.

Dated: 4/15/2026

Respectfully Submitted:



Leiny Ruiz, Esq.
Neuhauser Law PLLC
64-25 Central Ave., 2nd Fl.
Glendale, NY 11385
PH: 718-437-6000

Proof of Service

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

RESPONDENT'S MOTION TO SUBSTITUTE COUNSEL

To the following:

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