

HS Law Corp.
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Non-Detained

UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
IMMIGRATION COURT
900 Market Street, Suite 504
Philadelphia, PA 19107

_____)	
In the Matter of)	
)	
Jose Paixao de Lima)	File No. A. 216-914-874
Arlete Cabral Teixeira)	File No. A. 216-914-875
Andrey Cabral de Lima)	File No. A. 216-914-876
)	
In Removal Proceedings)	
)	
_____)	

Immigration Judge: Fox, Melissa

Next Hearing Date: May 5, 2026, at 8:30 AM.

RESPONDENTS' ALTERNATIVE MOTION FOR VIDEO APPEARANCE

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RESPONDENTS' ALTERNATIVE MOTION FOR VIDEO APPEARANCE

The Respondents, through undersigned counsel, respectfully submits this Alternative Motion for Video Appearance in connection with the upcoming Master Calendar Hearing currently scheduled for **May 5, 2026, at 8:30 AM.**, and in support thereof states the following:

The Respondents have previously filed a Motion to Continue in compliance with the Court's procedures. However, should the Court deny the Motion to Continue and require the Respondents' and counsel's appearance, Respondents respectfully requested permission for Respondents and counsel to appear at the hearing via videoconference.

This Motion is made in good faith, with the purpose of ensuring Respondents' meaningful participation in the proceedings while addressing significant logistical challenges, and is consistent with principles of judicial efficiency and access to justice.

As counsel representing numerous clients in immigration proceedings, the ability to appear by Webex is essential to ensuring that counsel can provide effective and meaningful legal representation while managing court obligations in multiple jurisdictions.

Additionally, Respondents' counsel recently assumed representation in this matter. Given the upcoming hearing date and the limited time available to make arrangements, coordinating travel between California and Pennsylvania on such short notice would impose a substantial logistical and financial burden. This request is not made for mere convenience, but rather to ensure that Respondents are able to proceed with their chosen counsel while avoiding unnecessary delay, expense, and disruption to the effective preparation of their case.

Furthermore, Master Calendar Hearings are procedural in nature and do not involve witness testimony, credibility determinations, or evidentiary presentations that would mandate the Respondents' in-person appearance.

The Immigration Court has authority to permit video teleconference (VTC) appearances pursuant to 8 C.F.R. § 1003.25(c), which provides that: "At the immigration judge's discretion, and with the consent of the alien, the immigration judge may conduct any hearing or portion thereof by video conference, as defined in § 1003.25(a)."

Permitting video appearance will not prejudice the parties or the proceedings. The technology used for video conferences allows for clear communication between the parties, and the court can still effectively conduct the proceedings and assess the evidence presented.

Participation by videoconference will allow the Respondents' and counsel to meaningfully attend the hearing, minimizing the need for travel, logistical complications, or unforeseeable delays. Requiring in-person appearance under these circumstances would impose an undue burden on Respondents' right to counsel of choice and effective representation.

Accordingly, Respondent respectfully submits that good cause exists for granting this Motion, and that doing so is consistent with the interests of justice, fairness, and efficient case management.

CONCLUSION

For the reasons previously outlined, the Respondent respectfully requests that, **in the event the Motion to Continue is not granted, the Court permits both the Respondent and counsel to appear at the Master Calendar Hearing by videoconference.** Alternatively, if the Respondents' in-person appearance is required, Respondent respectfully asks the court to **allow legal counsel to attend the hearing via video conference,** while the Respondent will be present physically.

Respectfully submitted,



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

**Jose Paixao de Lima
Arlete Cabral Teixeira
Andrey Cabral de Lima**

**File No. A. 216-914-874
File No. A. 216-914-875
File No. A. 216-914-876**

Proof of Service

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

RESPONDENTS' ALTERNATIVE MOTION FOR VIDEO APPEARANCE

To the following:

Office Location:	Mailing Address:
Office of the Principal Legal Advisor Department of Homeland Security 900 Market Street, Suite 346 Philadelphia, PA 19107	US Immigration and Customs Enforcement US Department of Homeland Security Office of the Principal Legal Advisor 900 Market Street, Suite 346 Philadelphia, PA 19107

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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