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**United States Department of Justice
Executive Office for Immigration Review
Immigration Court
Baltimore, MD**

_____)		
In the Matter of:)		
)	File No.:	A123456739
LEAHY, Paul)		
)		
In removal proceedings)		
_____)		

RESPONDENT’S WRITTEN PLEADINGS

I, ORPE, Counsel for LEAHY, A #123456739, enter the following pleadings to the Notice to Appear (hereinafter “NTA”) dated January 28, 2015 on behalf of my client. I have also explained to the respondent in their native language

- (a) the legal consequences of this plea and respondent agrees with my plea as set out below to the NTA;
- (b) the rights set forth in 8 CFR 1240.10(a);
- (c) the consequences of failing to appear in court as set forth in INA 240(b)(5);
- (d) the limitation on discretionary relief for failure to appear set forth in INA 240(b)(7);
- (e) the requirement to notify the court within five days of any change of address or telephone number, using form EOIR-33IC pursuant to 8 CFR 1003.15(d).

1. Respondent was properly named in the NTA – Yes
2. Respondent was properly served with the NTA – Yes.
3. Respondent admits to the allegations 1, 2, 3, 4 and 5.
4. Respondent will claim an entry date October, 2005.
5. Respondent does not deny any allegations.

6. Respondent concedes removability to the following charge(s) 212(a)(7)(A)(i)(I) set forth in the NTA.
7. Respondent does not concede removability.
8. Respondent designates El Salvador for removal should that become necessary.
9. Respondent requests the following relief:
 - a. Asylum under INA §208;
 - b. Protection under Article II of the Convention Against Torture;
 - c. Cancellation of Removal for Non-Permanent Residents under INA 240A(b);

July 02,2015

Date Plea Entered

Edward Moises
Signature of Representative

RESPONDENT'S PLEADING DECLARATION

I, Paul HEAHY, have been advised of my rights in these proceedings by my attorney or representative. I understand those rights. I waive a further explanation of those rights by this court.

I have been advised by my attorney or representative of the consequences of failing to appear for a hearing. I have also been advised by my attorney of the consequences of failing to appear for a scheduled date of departure or deportation. I understand those consequences.

I have been advised by my attorney or representative of the consequences of knowingly filing a frivolous asylum application. I understand those consequences.

I have been advised by my attorney or representative of the consequences of failing to follow the DHS biometrics instructions within the time allowed. I understand those consequences.

I understand that if my mailing address changes I must notify the court within 5 days of such change by completing an Alien's Change of Address Form (Form EOIR-33/IC) and filing it with this court.

Finally, my attorney or representative has explained to me what this Written Pleading says. I understand it, I agree with it, and I request that the court accept it as my pleading.

Paul HEAHY
Signature of Respondent

July 05, 2005

Date