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**JUVENILE
DETAINED**

Attorney for Respondent
Maria Estefany Garcia Ruiz

**UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
OFFICE OF THE IMMIGRATION JUDGE
SAN FRANCISCO, CALIFORNIA**

In the Matter of:

Maria Estefany GARCIA RUIZ

Respondent,

In Removal Proceedings.

File Number: A123456789

Master Calendar Hearing

Hearing Date: December 9, 2013

Hearing Time: 1:30 P.M.

Before Hon. Michael J. Yamaguchi

RESPONDENT'S UNOPPOSED MOTION FOR CONTINUANCE

Respondent, through undersigned counsel, hereby requests that her Master Calendar hearing, currently set for December 9, 2013, at 1:30 P.M., be continued for at least 60 days, to allow time for the Santa Clara County Probate Court to issue a decision regarding Respondent's request for factual findings regarding Special Immigrant Juvenile Status, and states the following in support of this request:

I. STATEMENT OF FACTS AND PROCEDURAL HISTORY

1. Respondent is in the custody and care of the Office of Refugee Resettlement (ORR) as an unaccompanied alien child. She was placed in the ORR long-term foster care program at [REDACTED] on [REDACTED]. See Exhibit ("Exh.") A, Declaration of Helen Beasley.
2. On October 25, 2013, [REDACTED] submitted a guardianship petition and a request for factual findings regarding Special Immigrant Juvenile Status to the Santa Clara County Probate Court on Respondent's behalf. See *id.* A hearing on the submission will be held before the Santa Clara County Probate Court on January 7, 2014. See *id.*
3. Respondent will be eligible to submit an I-360 petition for Special Immigrant Juvenile Status to U.S. Citizenship & Immigration Services if the Santa Clara County Probate Court issues the requested factual findings on January 7, 2014.

II. ARGUMENT

Pursuant to 8 C.F.R. §1003.29 an Immigration Judge may grant a reasonable continuance for good cause shown. A continuance is warranted to give the Santa Clara County Probate Court time to issue a decision regarding Respondent's request for factual findings regarding Special Immigrant Juvenile Status. Accordingly, having shown good cause, a 60 day continuance of Respondent's Master Calendar hearing is warranted.

III. POSITION OF THE GOVERNMENT

On November 26, 2013, Assistant Chief Counsel Jennifer Castro of the Office of the Chief

Counsel indicated to undersigned counsel that the Department of Homeland Security does not oppose a continuance. See Exh. A.

IV. CONCLUSION

For the foregoing reasons Respondent respectfully requests that the Court continue her Master Calendar hearing for at least 60 days to allow time for the Santa Clara County Probate Court to issue a decision regarding Respondent's request for factual findings regarding Special Immigrant Juvenile Status.

Dated: November 27, 2013

Respectfully submitted,

Helen Beasley
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