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

In the Matter of:

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Respondents,

In Removal Proceedings.

File Numbers:

A\*\*\*  
A\*\*\*

Hearing Date: September \*\*, 2015  
Hearing Time: 1:00 p.m.  
Before Hon. Polly A. Webber

**MOTION TO PRESENT TELEPHONIC TESTIMONY OF EXPERT WITNESS**

Respondents, through undersigned counsel, hereby requests that \*\*\* be permitted to give her testimony to this Court telephonically.

Ms. \*\*\* has a Masters in Social Work and is a clinical therapist at Family Works Community Counseling in Richmond, California. She holds a Bachelor of Arts degree in Human Development and a Masters in Social Work degree from California State University. Ms. \*\* has been a clinical therapist at Family Works Community Counseling since January of 2011. Prior

to holding that position, Ms. \*\* was a clinical therapist at Ray of Light Trauma Center, and Family Therapist Intern at the Family Institute of Richmond, and a social work intern at Cesar Chavez Elementary School.

Ms. \*\*\* cannot travel to San Francisco for the hearing due to professional restraints, and thus cannot appear in person. She will be available for telephonic testimony on September \*\*, 2015 at 1:00 pm and can be reached at \*\*\*\*. Ms. \*\* will provide expert testimony regarding the harm and trauma Respondent Ms. \*\* suffered in El Salvador and the effects on Respondent.

Therefore, Respondents respectfully request that the Court allow Ms. \*\* to testify telephonically.

Dated: September 8, 2015

Respectfully submitted,

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Kaitlin Kalna Darwal  
Attorney for Respondents