

**UNITED STATES DEPARTMENT OF JUSTICE  
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW  
UNITED STATES IMMIGRATION COURT  
BALTIMORE, MARYLAND**

<b>IN THE MATTER OF</b>  [REDACTED]  <b>(RESPONDENT)</b>	<b>IN REMOVAL PROCEEDINGS</b>  A# [REDACTED] [REDACTED] [REDACTED]
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**JOINT MOTION TO TERMINATE PROCEEDINGS**

COMES NOW INTO COURT, Respondent, [REDACTED], through undersigned Counsel, and respectfully moves this Honorable Court to terminate proceedings without prejudice pursuant to 8 C.F.R. § 1003.23(b)(4)(iv).

The Office of Chief Counsel for Immigration & Customs Enforcement hereby joins in this Motion to Reopen and Terminate Proceedings. In support of this request, Respondent states the following:

1. Respondent is a native and citizen of Honduras.
2. Respondent entered the United States without inspection on or about June 23, 1997 and has since continuously resided in the United States.
3. Respondent has been married to U.S. citizen [REDACTED], a Specialist in the United States Army, for over three years and together they have two U.S. citizen children. Respondent's spouse is currently assigned to [REDACTED] [REDACTED] in [REDACTED], [REDACTED] as a [REDACTED].
4. Respondent's immediate family members are all either U.S. citizens or legal permanent residents. Respondent's mother is a U.S. citizen, his sister is a U.S. citizen, his brother is a Legal Permanent Resident, and his grandmother is a U.S. citizen.

5. Respondent's sister, [REDACTED], is also in the U.S. Army and is currently deployed in [REDACTED] with her husband, [REDACTED], who serves as a Captain in the U.S. Army.
6. On November 15, 2011, Respondent through undersigned counsel submitted a "Parole in Place" request to Baltimore CIS Director [REDACTED].
7. If and when Respondent is paroled by Baltimore Citizenship and Immigration Services, Respondent will be eligible for adjustment of status.
8. If Respondent's "Parole in Place" request is denied and he is referred for removal proceedings, Respondent will pursue Non-LPR Cancellation of Removal before this Honorable Court.
9. For the foregoing reasons, Respondent and the Office of Chief Counsel request this Honorable Court terminate proceedings so that respondent may apply for adjustment of status before USCIS upon being granted parole and the issuance of Form I-94, Arrival-Departure Record.

WHEREFORE, for good cause shown, the Respondent and the Office of Chief Counsel for Immigration & Customs Enforcement request that this Joint Motion to Terminate Proceedings be granted.

Respectfully submitted this \_\_\_\_\_ day of \_\_\_\_\_ 2011,

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