

Michael T. Purcell
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Counsel for petitioner.

IN THE UNITED STATES DISTRICT COURT
IN AND FOR THE DISTRICT OF OREGON
EUGENE DIVISION

S.F.,)	File No.
)	
Petitioner,)	Agency No.
)	
vs.)	AXXX-XXX-755
)	
DREW BOSTOCK, Seattle Field Office)	DECLARATION OF
Director, U.S. Immigration and Customs)	MICHAEL T. PURCELL
Enforcement and Removal Operation, et al.,)	
)	
Respondents.)	

I, Michael T. Purcell, under penalty of perjury, do solemnly declare:

1. I am the attorney for the petitioner in this case.
2. On Monday, September 15, 2025, I sent to the Board of Immigration Appeals a motion to reopen the petitioner's previous removal order, together with the \$1,010

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filing fee and a substantial amount of supporting documents, as listed in the attached cover letter.

3. I sent these documents by express mail, with a copy to the DHS Chief Counsel at Detroit, Michigan, also by express mail.

4. Proof of mailing by way of a USPS receipt with item numbers is attached.

Dated this 15th day of September 2025

/s/ Michael T. Purcell

MICHAEL T. PURCELL
OSB #853094
Attorney for petitioner

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September 15, 2025

Board of Immigration Appeals
Clerk's Office
5107 Leesburg Pike, Suite 2000
Falls Church, VA 22041

RE: [REDACTED]

MOTIONS TO REOPEN AND STAY REMOVAL

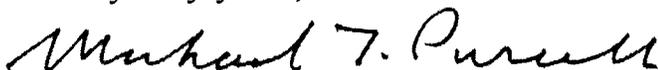
Dear Clerk of the Board:

The above person is seeking to reopen a previous decision of the Board dismissing his appeal from an order of removal entered by an immigration judge.

Consequently, enclosed, please find the following documentation:

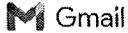
1. Form EOIR 27, Notice of Entry of Appearance before the Board
2. Motion to reopen;
3. Motion to stay removal;
4. Exhibits in Support of Motion to Reopen (part 1), indexed and numbered
5. Exhibits in Support of motion to Reopen (part 2), indexed and numbered;
6. Respondent's statement of criminal history, indexed and numbered; and
7. Filing fee check in the amount of \$1,010 (stapled to this letter).

Very truly yours,



Michael T. Purcell

cc: OPLA Detroit



Michael Purcell <mpurcell.law@gmail.com>

USPS eReceipt

1 message

DoNotReply@ereceipt.usps.gov <DoNotReply@ereceipt.usps.gov>
To: MPURCELL.LAW@gmail.com



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PORTLAND, OR 97214-2387
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09/15/2025 01:36 PM

TRACKING NUMBERS
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E1586971919US

TRACK STATUS OF ITEMS BY LINK
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Click to track items

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Send tracking number to 28777 (2USPS)
Standard message and data rates may apply

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PURCHASE DETAILS

Product	Qty	Unit Price	Price
PM Express Detroit, MI 48226 Weight: 4 lb 3.90 oz Signature Waiver Scheduled Delivery Date Wed 09/17/2025 06:00 PM Money Back Guarantee Tracking #: E1586971922US Insurance Up to \$100.00 Included	1		\$91.35
Total			\$91.35
PM Express Falls Church, VA 22041 Weight: 4 lb 3.70 oz Signature Waiver Scheduled Delivery Date Wed 09/17/2025 06:00 PM Money Back Guarantee Tracking #: E1586971919US Insurance Up to \$100.00 Included	1		\$91.35
Total			\$91.35
Grand Total:			\$182.70

Debit Card Remit \$182.70
Card Name: VISA
Account #: XXXXXXXXXXXX8000
Approval #: 133162
Transaction #: 261
Receipt #: 040813
Debit Card Purchase: \$182.70
AID: A000000980840 Contactless
AL: US DEBIT

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