

December 2, 2025

Alexandra Minogue, Esq.  
Nova Law Group  
21 Fulton St.  
Newark, NJ 07102  
T: 844-444-6682

**VIA PACER**

The Honorable Evelyn Padin, U.S.D.J.  
Martin Luther King Building  
& U.S. Courthouse  
50 Walnut Street, Courtroom 4C  
Newark, NJ 07101

RE: *Lauriedson Goncalves Rufo v. Erik Rokosky, et al.*  
**Docket No.: 2:25-cv-17418**

Dear Honorable Evelyn Padin, U.S.D.J.,

The undersigned represents Petitioner Lauriedson Goncalves Rufo (“Mr. Rufo”) in the above-captioned proceeding. On November 25, 2025, You Honor granted the Writ of Habeas Corpus filed on November 13, 2025, denied the Motion for Temporary Restraining Order as moot, and ordered a bond hearing no later than seven days after entry. *Exhibit A: 11/23/25 Federal Judge Padin’s Order.*

On December 2, 2025, and only as per Your Honor’s Court Order, a bond hearing was conducted before Immigration Judge Tamar H. Wilson; in preparation for the bond hearing, the undersigned submitted a set of documents demonstrating that Mr. Rufo is deserving of bond, as he presents neither a risk of flight nor a danger to the community. *Exhibit B: Mr. Rufo’s Bond Package Submitted to EOIR.* IJ Wilson denied bond finding Mr. Rufo as a flight risk for the foregoing “reasons,” including but not limited to: 1. Notwithstanding the Motion to Reopen filed by prior counsel and the **September 30, 2024 Order** Reopening Proceedings issued by Immigration Judge John Carle<sup>1</sup>, Mr. Rufo had long been on notice of the

---

<sup>1</sup> Immigration Judge John Carle: Respondent's case constitutes an "exceptional situation" warranting the exercise of the Court's sua sponte authority to reopen. Here. Respondent was placed into removal proceedings when he was a seventeen-year-old child. **The hearing notice was sent to his father Antonio. There is nothing in the record to indicate this Respondent was ever advised by his father that he had any immigration hearing. As a child, he was reliant on his father to give him information about his case. As a child, he relied on his father to fully apprise him of his responsibility to attend hearings. attention to her son's case.** Given the Court's concern that this child was not adequately provided information about the status of his case and his duty and responsibility to attend hearings and may not have been adequately directed by his father, **the Court is not fully convinced that he had adequate notice of his hearing or was apprised by his father as to the status of his immigration case.** Overriding

final order of removal and failed to appropriately attend to his immigration matters, *Exhibit C: Order Granting Motion to Reopen*; 2. Mr. Rufo failing to attend a **single** ICE check-in due to medical illness; and 3. There is no meritorious application presently before Her Honor, notwithstanding the fact that Mr. Rufo's Form I-589, Application for Asylum, Withholding of Removal, and protection under the Convention Against Torture, will be promptly refiled following its rejection on the sole ground that "other counsel [was] entered," an issue that can be readily resolved through the pending Motion to Substitute Counsel. The Immigration Judge's finding that Mr. Rufo is a flight risk is contrary to the clear record and the realities of his circumstances. Mr. Rufo has profound and enduring ties to the United States: he has been married to a U.S. citizen for five years whom is financially dependent on him, has a pending Form I-130, Petition for Alien Relative, filed on July 22, 2022 and delayed solely due to agency backlog, has invested substantial personal and financial resources in establishing a legitimate barbershop business, and maintains deep relationships within a supportive community that has become like family.<sup>2</sup> These factors demonstrate both his stability and his commitment to remaining in the United States. Failure to attend one ICE check-in was an isolated incident, attributable to documented medical issues, and do not reflect a pattern of disregard for legal obligations. To label Mr. Rufo a flight risk ignores the overwhelming evidence of his reliability, responsibility, and integration into U.S. society.

As demonstrated by the tumultuous and unpredictable nature of current administration policies, it

---

all these concerns is the clear fact that Respondent was a child when he was ordered deported in absentia and may not have been aware of his responsibility to attend all hearings or risk being removed and may not have been told by the adults in his life that he needed to be at his hearing. Further, Respondent is married to a U.S. citizen, has no criminal record and is prima facie eligible to see a 1-601A waiver.

<sup>2</sup> Letter, dated November 6, 2025, from *Jose Zacarias Dias, Senior Pastor of CANAA Church*, evidencing Mr. Rufo's membership since 2016 and good moral character. Letter, dated November 12, 2025, from *Detective Fabio Medeiros of Newark Police Department*, who has known Mr. Rufo for six years, evidencing Mr. Rufo's love and commitment to the community, aid to law enforcement whenever sought, and acknowledgment that Mr. Rufo is a law-abiding individual with high values. Letter, dated November 11, 2025, from *Deputy Mayor of Newark Ligia De Freitas*, evidencing Mr. Rufo as a valued member of his community that persistently gives back, whether through free haircuts for children or economic vitality, and that his removal from this nation would be a significant loss to the community he serves. Letter dated, November 10, 2025, from the *Captain of the New York City Police Department and Pastor at CANAA Church*, Kenneth O. Fernandez, evidencing his strong moral character, willingness to serve others, and respect for authority. Letter from *friend, Margaret Kirwan* evidencing Mr. Rufo's kindness, honesty, and deep sense of commitment to the community. Letter from *friend, Wallace De Oliveira*, evidencing Mr. Rufo is a good person with strong character, a stable life, and genuine commitment of doing what is right. Letter, dated February 12, 2024, from *neighbor Ms. Moutinho* providing Mr. Rufo is wildly trustworthy, always looking out for her, and that he was by her side when she lost one of her own sons. Letter, dated January 23, 2023, from *neighbor Elsie Ferreirina*, who suffers with vertigo and heart problems, provided Mr. Rufo drives her to doctor's appointments, helps translate whenever needed, buys her groceries, checks on her daily, and helps move things around the house. Letter, dated March 3, 2024, from *friend, Jimmy Freitas*, evidencing Mr. Rufo as dedicated, hardworking, and having unwavering moral integrity. Letter from friend, dated February 20, 2025, *friend, Luana P. Da Silva*, evidencing Mr. Rufo has dedicated personal time and funds to helping people in need of meals and other resources. Letter, dated March 6, 2024, from *friend, Gabriel Belvedere De Goes*, evidencing as a loving, genuine individual, who embodies the "American Dream"

is profoundly unjust that an individual as clearly deserving of bond as Mr. Rufo is being denied release for the reasons cited. Your Honor, Mr. Rufo is a young man of exceptional character - generous, responsible, and deeply committed to his family, business, and community. He has repeatedly demonstrated his reliability and respect for the law. For the foregoing reasons, the undersigned *pleads* for his release.

Sincerely,



---

Alexandra Minogue, Esq.  
NJ Bar ID: 479582024  
Nova Law Group  
21 Fulton Street  
Newark, NJ 07102  
E: [aminogue@nova.law](mailto:aminogue@nova.law)  
P: 844-844-6682  
*Counsel for Petitioner*

CC: Alex Silagi, Esq.  
*Counsel for Respondents*

## **EXHIBIT A**

**U.S. District Court  
District of New Jersey [LIVE] (Newark)  
CIVIL DOCKET FOR CASE #: 2:25-cv-17418-EP**

GONCALVES RUFO v. ROKOSKY et al  
Assigned to: Judge Evelyn Padin  
Cause: 28:2241 Petition for Writ of Habeas Corpus (federa

Date Filed: 11/13/2025  
Jury Demand: None  
Nature of Suit: 463 Habeas Corpus - Alien  
Detainee  
Jurisdiction: U.S. Government Defendant

**Petitioner**

**LAURIEDSON GONCALVES RUFO**

represented by **ALEXANDRA MINOGUE**  
21 Fulton St  
Nova Law Firm  
Newark, NJ 07102-4506  
201-283-2126  
Email: alex.minogue697@gmail.com  
**ATTORNEY TO BE NOTICED**

V.

**Respondent**

**ERIK ROKOSKY**

*in his official capacity as Director/Warden  
of Elizabeth Contract Detention Facility*

represented by **ALEX D. SILAGI**  
DOJ-USAO  
United States Attorney's Office  
970 Broad Street  
Newark, NJ 07102  
973-353-6001  
Email: alex.silagi@usdoj.gov  
**LEAD ATTORNEY**  
**ATTORNEY TO BE NOTICED**

**FRANCES C. BAJADA**  
OFFICE OF THE U.S. ATTORNEY  
970 BROAD STREET  
NEWARK, NJ 07102  
973-297-2038  
Email: frances.bajada@usdoj.gov  
**LEAD ATTORNEY**  
**ATTORNEY TO BE NOTICED**

**JOHN FRANCIS BASIAK**  
U.S. ATTORNEY'S OFFICE  
402 E. STATE STREET, ROOM 430  
TRENTON, NJ 08608  
(609) 858-0309  
Email: john.basiak@usdoj.gov  
**LEAD ATTORNEY**  
**ATTORNEY TO BE NOTICED**

**Respondent**

**JOHN TSOUKARIS**

*in his official capacity as Field Office  
Director, New Jersey Field Office, U.S.  
Immigration & Customs Enforcement*

represented by **ALEX D. SILAGI**  
(See above for address)  
*LEAD ATTORNEY  
ATTORNEY TO BE NOTICED*

**FRANCES C. BAJADA**

(See above for address)  
*LEAD ATTORNEY  
ATTORNEY TO BE NOTICED*

**JOHN FRANCIS BASIAK**

(See above for address)  
*LEAD ATTORNEY  
ATTORNEY TO BE NOTICED*

**Respondent**

**PAMELA BONDI**

*in her official capacity as Attorney General,  
U.S. Department of Justice*

represented by **ALEX D. SILAGI**  
(See above for address)  
*LEAD ATTORNEY  
ATTORNEY TO BE NOTICED*

**FRANCES C. BAJADA**

(See above for address)  
*LEAD ATTORNEY  
ATTORNEY TO BE NOTICED*

**JOHN FRANCIS BASIAK**

(See above for address)  
*LEAD ATTORNEY  
ATTORNEY TO BE NOTICED*

**Respondent**

**KRISTI NOEM**

*in her official capacity as Acting Secretary,  
U.S. Department of Homeland Security;*

represented by **ALEX D. SILAGI**  
(See above for address)  
*LEAD ATTORNEY  
ATTORNEY TO BE NOTICED*

**FRANCES C. BAJADA**

(See above for address)  
*LEAD ATTORNEY  
ATTORNEY TO BE NOTICED*

**JOHN FRANCIS BASIAK**

(See above for address)  
*LEAD ATTORNEY  
ATTORNEY TO BE NOTICED*

**Respondent**

**TODD M. LYONS**

*in his official capacity as Acting Director,  
U.S. Immigration & Customs Enforcement*

represented by **ALEX D. SILAGI**  
(See above for address)  
*LEAD ATTORNEY  
ATTORNEY TO BE NOTICED*

**FRANCES C. BAJADA**  
 (See above for address)  
 LEAD ATTORNEY  
 ATTORNEY TO BE NOTICED

**JOHN FRANCIS BASIAK**  
 (See above for address)  
 LEAD ATTORNEY  
 ATTORNEY TO BE NOTICED

Date Filed	#	Docket Text
11/13/2025	<u>1</u>	PETITION for Writ of Habeas Corpus ( Filing fee \$ 5 receipt number ANJDC-16820423.), filed by LAURIEDSON GONCALVES RUFO. (Attachments: # <u>1</u> Civil Cover Sheet Civil Cover Sheet)(MINOGUE, ALEXANDRA) (Entered: 11/13/2025)
11/14/2025	<u>2</u>	MOTION for Temporary Restraining Order by LAURIEDSON GONCALVES RUFO. (MINOGUE, ALEXANDRA) (Entered: 11/14/2025)
11/14/2025		Case Assigned to Judge Evelyn Padin. (mfr) (Entered: 11/14/2025)
11/14/2025	<u>3</u>	ORDER TO ANSWER; denying in part <u>2</u> Motion for TRO; that within seven (7) days of the entry of this Order, respondents shall electronically file a response to the Motion, and an answer to the Petition. Signed by Judge Evelyn Padin on 11/14/2025. (N/M) (adc, ) (Entered: 11/14/2025)
11/21/2025	<u>4</u>	RESPONSE to Petition for Writ of Habeas Corpus by PAMELA BONDI, TODD M. LYONS, KRISTI NOEM, ERIK ROKOSKY, JOHN TSOUKARIS.(SILAGI, ALEX) (Entered: 11/21/2025)
11/23/2025	<u>5</u>	BRIEF <i>REPLY</i> (MINOGUE, ALEXANDRA) (Entered: 11/23/2025)
11/25/2025	<u>6</u>	TEXT ORDER: This matter comes before the Court upon Petitioner Lauriedson Goncalves Rufo's Verified Petition for Writ of Habeas Corpus 28 U.S.C. § 2241 and Motion for a Temporary Restraining Order ("TRO") and Preliminary Injunctive Relief ("P.I."), D.E. 1 ("Petition"). Petitioner asserts he is unlawfully detained by immigration authorities under 28 U.S.C. § 1225(b) without a bond hearing, and that he is entitled to a bond hearing pursuant to 8 U.S.C. § 1226(a) and 8 C.F.R. § 236.1(d). The Court denied the Motion for a TRO. D.E. 3 ("Order"). Respondents filed a letter response, D.E. 4, stipulating to the facts alleged in the Petition, and acknowledging that they rely on the same statutory interpretation set forth in <i>Matter of Yajure Hurtado</i> , 29 I&N Dec. 215 (B.I.A. 2025), which this Court rejected in <i>Lomeu v. Soto</i> , No. 25-16589, 2025 WL 2981296 (D.N.J. Oct. 23, 2025). Petitioner filed a reply brief seeking release or a bond hearing. D.E. 5. Therefore, for the same reasons stated in <i>Lomeu</i> , the Court <b>GRANTS</b> the Petition and dismisses Petitioner's Motion for a P.I., D.E. 1, as <b>MOOT</b> . Respondents shall provide Petitioner a bond hearing as soon as practical but no more than <b>7 days</b> from the date of this Order. Respondents shall file a letter on the docket, within <b>3 days</b> of the bond hearing, advising the Court of the outcome. So Ordered by Judge Evelyn Padin on 11/25/2025. (bt) (Entered: 11/25/2025)
12/02/2025	<u>7</u>	STATUS REPORT <i>Regarding Bond Hearing</i> by PAMELA BONDI, TODD M. LYONS, KRISTI NOEM, ERIK ROKOSKY, JOHN TSOUKARIS. (SILAGI, ALEX) (Entered: 12/02/2025)

<b>PACER Service Center</b>			
<b>Transaction Receipt</b>			
12/02/2025 16:16:59			
<b>PACER Login:</b>	alexandra.minogue	<b>Client Code:</b>	
<b>Description:</b>	Docket Report	<b>Search Criteria:</b>	2:25-cv-17418-EP Start date: 1/1/1980 End date: 12/2/2025
<b>Billable Pages:</b>	4	<b>Cost:</b>	0.40

## **EXHIBIT B**

**NOVA LAW GROUP**  
21 Fulton Street  
Newark NJ 07102.  
Phone (844)844-6682  
removal@nova.law

**DETAINED**

**UNITED STATES DEPARTMENT OF JUSTICE  
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW  
IMMIGRATION COURT  
ELIZABETH, NEW JERSEY**

**In the Matter of:**

**GONCALVES-RUFO, Lauriedson**

**In Removal Proceedings.**

**File No.:**



**Immigration Judge:  
Tamar H. Wilson**

**Next Hearing:  
December 2, 2025, at 8:30AM**

**RESPONDENT'S SUPPORTING DOCUMENTS FOR BOND REQUEST**

UNITED STATES DEPARTMENT OF JUSTICE  
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW  
IMMIGRATION COURT  
ELIZABETH, NEW JERSEY

In the Matter of:  
  
GONCALVES-RUFO, Lauriedson  
  
In Removal Proceedings.

File No.: 

Immigration Judge:  
Tamar H. Wilson

Next Hearing:  
December 2, 2025, at 8:30AM

RESPONDENT'S SUPPORTING DOCUMENTS FOR BOND REQUEST

INDEX

INDEX	Pages 2-3
<hr/>	
TAB A: Sponsor Documentation, Mariana A. Nunez, U.S. Citizen Wife	Pages 4-39
• Tax Return .....	5
• Letter in Support .....	36
• Identification.....	37
• Marriage Certificate .....	39
<hr/>	
TAB B: Letters in Support	Pages 40-54
• Letter from Jose Zacarias Dias, Senior Pastor of CANAA Church.....	41
• Letter from Detective Fabio Medeiros of Newark Police Department.....	42
• Letter from Deputy Mayor of Newark, Ligia De Freitas..	43
• Letter dated from the Captain of the New York City Police Department and Pastor at CANAA Church, Kenneth O. Fernandez.....	44
• Letter from friend, Margaret Kirwan.....	45
• Letter from friend, Wallace De Oliveira.....	46
• Letter from neighbor, Maria Moutinho.....	47

---

• <i>Letter from friend, Luana P. Da Silva</i> .....	49
• <i>Letter from friend, Gabriel Belvedere De Goes</i> .....	50
• <i>Letter from neighbor, Elsie Ferreirina</i> .....	52
• <i>Letter from friend, Jimmy Freitas</i> .....	53

---

<b>TAB C: Order entered by Federal District Court Judge Evelyn Padin</b>	Pages 55-59
--	-------------

---

<b>TAB D: I-130 Petition &amp; Receipt Notice</b>	Pages 60-72
---	-------------

---

<b>TAB E: Pending Motion to Substitute Counsel &amp; Rejected Asylum Application due to Other Counsel</b>	Pages 73-105
---	--------------

---

<b>TAB F: 9/30/25 Order Granting Motion to Reopen</b>	Pages 106-110
---	---------------

---

<b>TAB G: ICE Check-In Notices</b>	Pages 111-135
• <i>11/13/25 ICE Check-In</i> .....	112
• <i>10/18/25 ICE Check-In &amp; Doctor's Report</i> .....	113

---

<b>PROOF OF SERVICE</b>	Page 136
-------------------------	----------



---

To Whom It May Concern,

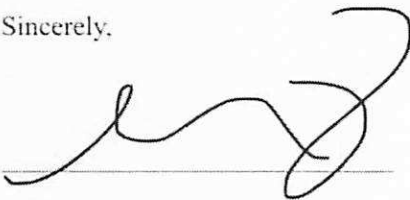
My name is Mariana Nunez, and I am the wife of Lauriedson Goncalves Rufo. I am writing to express my full support for Lauriedson Goncalves Rufo as he goes through his immigration proceedings. I have known him since November 2018, when we met at church, and over the years I've come to truly understand the kind-hearted, genuine person he is.

Lauriedson Goncalves Rufo has always been someone who gives back to others. He has volunteered his time within the community and has provided free haircuts to people in need, offering help in simple but meaningful ways. One of his biggest accomplishments has been opening his own barbershop — something he worked hard for and built with dedication and pride. It reflects his work ethic, responsibility, and the positive impact he tries to make around him.

I am fully committed to providing financial support and stable housing for Lauriedson Goncalves Rufo throughout this process. I will ensure he attends all required court hearings and meets every obligation. He is responsible, respectful, and consistently strives to do things the right way.

This process has been difficult for both of us, but I stand by him completely. I hope this letter reflects my support for Lauriedson Goncalves Rufo and my confidence in his character. If additional information is needed, please feel free to contact me at  and/or at  Thank you for your time.

Sincerely,



Mariana Nunez

# **TAB B**

# Igreja Evangelica Canaa

## D/B/A: CANAA CHURCH

201 – 209 Thomas Street \* Newark \* New Jersey \* 07114

[churchcanaan21@gmail.com](mailto:churchcanaan21@gmail.com) Ph: 973-465-0226

November 6, 2025

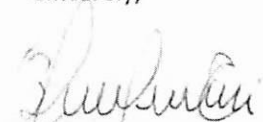
To whom it may concern:

I, Pastor **JOSE ZACARIAS DIAS**, President of Igreja Evangelica Canaa, as above captioned, declare to whom it may concern that **LAURIEDSON GONÇALVES RUFO**, is a Member of our Church and have been in good standing since 2016. He has been active and engaged in our Church vision.

I take this opportunity to confirm with great joy before any authorities that this letter may go so far that brother **LAURIEDSON GONÇALVES RUFO**, is well known and very respected for his solid reputation, diligence and honorable commitment to do his very best, proven throughout his dedication at our church.

Should any further information be deemed necessary, please do not hesitate to contact me at the address, phone number as well as my e-mail information listed above.

Sincerely,



**JOZE ZACARIAS DIAS**  
Senior Pastor

*Ligia De Freitas*  
Mayor Ligia S. De Freitas



CITY OF NEWARK  
Mayor Ras J. Baraka  
NEW JERSEY

To  
W  
ho Mayor's Office of International Relations  
And Diaspora Affairs (MOIRDA)

A CITY WE CAN ALL BELIEVE IN

m  
If **Ligia De Freitas**  
M Deputy Mayor  
ay Concern,

As the Deputy Mayor of the City of Newark, I am writing this letter on behalf of a valued resident, **Mr. Lauriedson Goncalves Rufo**. Mr. Rufo has been a resident of the United States since 2016 and has made significant contributions to our city and state through his professional dedication and active community involvement.

Mr. Rufo has worked at **Step Up Barbershop in Newark** from 2018 to 2025, where he has consistently demonstrated a strong work ethic and commitment to service. Through Step Up, he and his colleagues give back to the community by participating in local social events promoted by law enforcement, including annual initiatives to provide free haircuts for children before the school year begins. These efforts have made a meaningful impact on local families and fostered positive community relations.

Mr. Rufo is married to **Mrs. Mariana Nunez**, a full-time student at Eastern International College and a part-time employee at AbraDental in Elizabeth. Together, they contribute to our community's educational and economic vitality and represent the values of hard work, dedication, and compassion that define our city.

Mr. Rufo is a respected and hardworking member of our community—deeply rooted in the principles that make this country strong. Like many immigrants, he has proven his commitment to the United States economically, socially, and culturally. His removal would not only cause emotional and psychological harm to him and his family but would also represent a loss to the community he continues to serve.

I respectfully urge you to consider allowing **Mr. Lauriedson Goncalves Rufo** to remain in this country, where he continues to contribute meaningfully and live peacefully with his family.

Thank you for your time and consideration in this matter.

**Best Regards,**

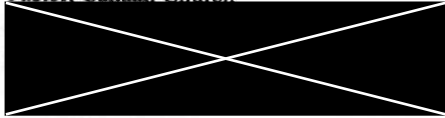
Deputy Mayor

Ligia De Freitas

920 Broad Street, Room 218A Newark, NJ 07102  
PH: 973-733-3309 FAX: 973-353-8440 Email: defreitasl@ci.newark.nj.us

*[Signature]* 11/11/25  
IGOR N PERRU  
NOTARY PUBLIC  
STATE OF NEW JERSEY  
MY COMMISSION EXPIRES 03/25/2028  
COMMISSION: #50208214

Kenneth O. Fernandez  
Captain, New York City Police Department  
Pastor, Canaan Church



November 10, 2025

Der judge,

It is with great respect and sincerity that I write this letter of recommendation for Mr. Lauriedson Gonçalves Rufo. I have had the honor of serving as Lauriedson's youth pastor for many years, watching him grow from a teenager into a mature, responsible, and devoted man of faith. It has truly been a blessing to see his personal and spiritual growth over the years.

From his youth, Lauriedson stood out for his positive attitude, strong moral character, and willingness to serve others. He was always respectful, eager to learn, and dedicated to his church community. As he grew older, I witnessed him become a devoted husband, a man of integrity, and a reliable presence within our congregation. His humility and consistency reflect genuine values that come from faith and family.

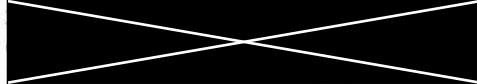
In my dual role as both a Pastor and a Captain in the New York City Police Department, I meet people from all walks of life. Lauriedson stands among the few who consistently demonstrate responsibility, honesty, and compassion in everything they do. He is hardworking and family-oriented, and he lives by principles that make him a role model to others, especially the youth who look up to him.

I have complete confidence in Lauriedson's character and his ability to continue being a positive influence wherever he goes. He is a man who contributes to his community, respects authority, and seeks peace and stability for his family and those around him. I respectfully ask that you take his good character and history of service into strong consideration in your review.

If you require any further information, please do not hesitate to contact me directly.

With respect and blessings,

Kenneth O. Fernandez  
Captain, New York City Police Department  
Pastor, Canaan Church



11/11/25  
IGOR N PERRU  
NOTARY PUBLIC  
STATE OF NEW JERSEY  
MY COMMISSION EXPIRES 03/25/2028  
COMMISSION #50205214

Margaret Kirwan



November 12, 2025

To Whom It May Concern,

I am writing this letter in reference to Mr. Lauriedson Goncalves Rufo. I met Mr. Rufo through Step Up Barbershop in Newark in 2021. From that time until present day, he has been my barber and has become my friend.

Throughout the time that I have known Mr. Rufo, he has consistently demonstrated kindness, honesty, and a deep sense of responsibility towards others. He is known for his commitment to the community. He has volunteered his time and talent to giving free haircuts to the underserved of our community.

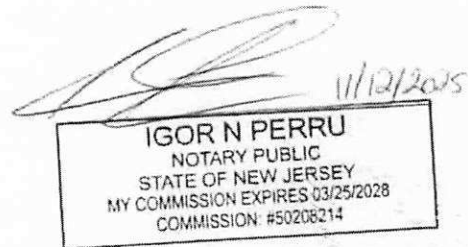
In my personal interactions with Mr. Rufo, he has always demonstrated a high moral compass, commitment to treatment to all individuals with dignity and respect.

I fully support Mr. Rufo for any immigration related matters and stand behind his character. I believe Mr. Rufo will continue to be a law abiding and valuable asset to society.

Thank You for your time and consideration,

Margaret Kirwan

A handwritten signature in black ink, appearing to be 'MK', written over a redacted area.




I met **Lauriedson Gonçalves Rufo** through his work as a barber, and over time we became good friends. He has always shown himself to be a hardworking, honest, and kind-hearted person. He treats everyone with respect, is friendly to his clients, friends, and family, and always acts with responsibility and humility.

We have also had the opportunity to attend church together on a few occasions, which allowed me to see even more of his positive and caring nature. Lauriedson values faith, family, and community, and often encourages his friends to follow a good path in life.

I sincerely believe he is a good person with strong character, a stable life, and a genuine commitment to doing what is right. I have complete confidence in recommending him as a trustworthy and respectable individual.

**Wallace De Oliveira**



11/12/2025

<p><b>IGOR N PERRU</b> NOTARY PUBLIC STATE OF NEW JERSEY MY COMMISSION EXPIRES 03/25/2028 COMMISSION: #50208214</p>
---

Maria Moutinho  
[Redacted]

February 12th, 2024

Re: Lauriedson Goncalves Rufo.  
Character Reference

TO WHOM IT MAY CONCERN:

On behalf of Mr Rufo, in re above, I can vouch for his character as I have known him for about six years. I was born Maria Moutinho in Portugal, [Redacted] I have lived in Newark, NJ, since 2003.

I have known Mr. Rufo and his lovely wife, Mariana, who are my next-door neighbors for the last 6 years here at [Redacted]

Coincidentally, Mr. Rufo and my husband are from the same town back in Brazil. That obviously made our relationship be much closer.

There are countless times that Mr. Rufo and his wife look after our house and our pets when we are away. This shows how trustworthy he is to us.

As a friend, he and his wife, had been by my side when I lost one of my sons, being a very traumatic period in my life.

He has a lovely disposition and a wonderful big smile. I have also noted that he helped other neighbors and people he doesn't know. He is a caring and giving individual who would be an asset to our country if given his American Citizenship

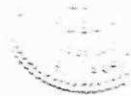
If I can be of any further assistance, please contact me.

Sincerely Yours,

Maria Moutinho

*Maria Moutinho*

*[Signature]* 02/21/24  
IGOR N PERRU  
NOTARY PUBLIC  
STATE OF NEW JERSEY  
MY COMMISSION EXPIRES 02/25/2028  
COMMISSION: 86020824



Luana P. Da Silva



February 20, 2024

Re: Character reference letter for Immigration of Launedson Gonçalves Rufo

Dear Sir or Madam,

I am writing this immigration letter of support for Lauriedson Gonçalves Rufo D.O.B. [REDACTED] Spouse of Mariana Alves Nunez, residing at [REDACTED] Newark, NJ 07105


My name is Luana Priscilla Da Silva, I Am an American Citizen, passport number: [REDACTED] Mr. Rufo is a very good and dear friend of mine, he is also my husband's cousin on his father's side. I have known Mr. Rufo for approximately 7.5 years, he is an excellent and dedicated contribution to our family, church, and society.

Mr. Rufo is very hard working, honest, skillful, kind, and responsible person. Lauriedson and Mariana have spent many holidays and occasions with my family, they are precious to us. Mr. Rufo has also helped my family and I dedicate personal time and funds to helping people in need with meals and other resources. As a friend and extended family, I can attest that it is my honor in writing this letter of recommendation for Lauriedson and that it would be a great contribution to this country if he were allowed to stay, I am privileged in knowing him and sincerely hope and pray this letter helps him.

If there is anything else I can help you with please don't hesitate to contact me, I'm reachable by phone or email, [REDACTED] I am happy to answer all your concerns in this regard.

Many thanks for your time.

Sincerely,  
  
Luana Da Silva

  
IGOR N PERRU  
NOTARY PUBLIC  
STATE OF NEW JERSEY  
MY COMMISSION EXPIRES 02/25/2028  
COMMISSION: JS020824  
03/06/24

Gabriel Belvedere De Goes



To Whom it May Concern,

I am writing this letter regarding Lauriedson Goncalves Rulo, to support and advocate for his application to receive lawful permanent resident status in the United States. I have known Lauriedson for 8 years, and his wife Marianna for longer. Throughout our friendship, we've also crossed professional paths as he is my barber at Step Up Salon on Jefferson St. in Newark, and I have performed renovations for him in his apartment on Nichols St. in Newark. Spending time with Lauriedson is always a pleasure whether it is as friends or as a professional and client. In both settings, his character remains upright, kind, generous, and edifying to those around him. Every time I go for a haircut with him, he treats me to lunch, and for the month I was at his home daily doing renovations to his apartment, he and his wife cooked me homemade meals every day. They're very welcoming and hospitable people and have even welcomed my wife and our son to their home on numerous occasions.

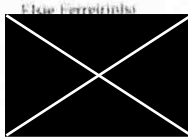
Lauriedson is a hard worker in all facets of his life including work and learning English (which he now speaks wonderfully from knowing no English at all), he puts a lot of time and effort into his friendships, and is a helping hand in his community. We used to attend the same church, Igreja Canaã, on South St. in Newark. He would volunteer to help with many of the events in support of the church like garage sales, dinner parties, prayer events, etc. As someone who just recently became a citizen myself, I fully believe that Lauriedson Goncalves Rulo would make a great citizen of the United States of America as he truly embodies the "American Dream," which is to work hard, and through determination and initiative, anyone, regardless of where they were born or what social class they are in, can have an equal chance at their version of success. I am honored to write this letter in support of Lauriedson receiving his green card, and I am even more honored to have him in my life as a dear friend.

Please use the contact information listed above should you require anything else from me. I'd be happy to help in any way possible.

Sincerely,


Gabriel Belvedere De Goes



IGOR N PERRU  
NOTARY PUBLIC  
STATE OF NEW JERSEY  
MY COMMISSION EXPIRES 03/2028  
COMMISSION 10272214


Elsie Ferreira  


Re: Lauridson Goncalves Rufo  
Character Reference

TO WHOM IT MAY CONCERN:

On behalf of Mr Rufo, in re above, I can vouch for his character as I have known him for about five years. I was born Elsie Perlater in Montgomery County, Virginia,  I have lived in Newark, NJ, since Thanksgiving 1973.

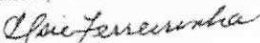
Over the years I have gotten to know Mr. Rufo and his lovely wife, Mariana, who are my neighbors down the street at  I live at 


 Mr. Rufo, works at Step Up Salon, as a barber on the 1<sup>st</sup> floor of my building. He speaks English very well and has translated messages to his boss and co-workers many times for me. As a friend, he had helped me carry groceries up the stairs, gone and gotten groceries for me when I have been ill, given me a ride to and from my doctor, checks on me almost every day to see if I am okay. He has helped me move, reach and carry things in and out and climb up for things I can no longer do. He and his wife have even taken me out to eat with them. I have come to think of them as extended family. I am a heart patient and have Vertigo.

He has a lovely disposition and a wonderful big smile. I have also noted that he helped other neighbors and people he doesn't know. He is a caring and giving individual who would be an asset to our country if given his American Citizenship. His wife Mariana, in Dental School, seems to be just like him-- beautiful souls.

If I can be of any further assistance, please contact me.

Sincerely Yours,

  
Elsie Ferreira

 02/21/24  
**IGOR N PERRU**  
NOTARY PUBLIC  
STATE OF NEW JERSEY  
MY COMMISSION EXPIRES 03/31/2028  
COMMISSION #2008214



Jimmy Freitas



To Whom It May Concern:

I, Jimmy Freitas, born in Newark, New Jersey in 1992, compose this correspondence on behalf of Lauriedson Goncalves Rufo, whose character I wholeheartedly endorse

My friendship with Mr. Rufo dates back to 2017, when he became my barber. One of the highlights of our friendships is going on road trips. In times of emotional turbulence, Mr. Rufo has consistently offered unwavering support. In 2020, I had the privilege of standing as the best man at the wedding of Lauriedson Goncalves Rufo and Mariana Nunez, further solidifying our bond.

Lauriedson Goncalves Rufo exemplifies dedication and hard work, as well as unwavering moral integrity. He shows a remarkable ability to learn quickly, and this ability is only matched by his exceptional kindness and compassion towards others.

I am firmly convinced that Mr. Rufo constitutes a valuable asset to this nation, and given the opportunity, he will undoubtedly continue to contribute lawfully and meaningfully.

For any additional inquiries or clarifications, please do not hesitate to contact me at [REDACTED] or via email at [REDACTED]

Sincerely,

Jimmy Freitas

03/13/24  
IGOR N PERRU  
NOTARY PUBLIC  
STATE OF NEW JERSEY  
MY COMMISSION EXPIRES 03/25/2028  
COMMISSION #5620214

**TAB C**

HABEAS,PLO

**U.S. District Court  
District of New Jersey [LIVE] (Newark)  
CIVIL DOCKET FOR CASE #: 2:25-cv-17418-EP**

GONCALVES RUFO v. ROKOSKY et al  
Assigned to: Judge Evelyn Padin  
Cause: 28:2241 Petition for Writ of Habeas Corpus (federa

Date Filed: 11/13/2025  
Jury Demand: None  
Nature of Suit: 463 Habeas Corpus - Alien  
Detainee  
Jurisdiction: U.S. Government Defendant

**Petitioner**

**LAURIEDSON GONCALVES RUFO**

represented by **ALEXANDRA MINOGUE**  
21 Fulton St  
Nova Law Firm  
Newark, NJ 07102-4506  
201-283-2126  
Email: alex.minogue697@gmail.com  
*ATTORNEY TO BE NOTICED*

V.

**Respondent**

**ERIK ROKOSKY**

*in his official capacity as Director/Warden  
of Elizabeth Contract Detention Facility*

represented by **ALEX D. SILAGI**  
DOJ-USAO  
United States Attorney's Office  
970 Broad Street  
Newark, NJ 07102  
973-353-6001  
Email: alex.silagi@usdoj.gov  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**FRANCES C. BAJADA**  
OFFICE OF THE U.S. ATTORNEY  
970 BROAD STREET  
NEWARK, NJ 07102  
973-297-2038  
Email: frances.bajada@usdoj.gov  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**JOHN FRANCIS BASIAK**  
U.S. ATTORNEY'S OFFICE  
402 E. STATE STREET, ROOM 430  
TRENTON, NJ 08608  
(609) 858-0309  
Email: john.basiak@usdoj.gov  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**Respondent**

**JOHN TSOUKARIS**

*in his official capacity as Field Office  
Director, New Jersey Field Office, U.S.  
Immigration & Customs Enforcement*

represented by **ALEX D. SILAGI**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**FRANCES C. BAJADA**

(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**JOHN FRANCIS BASIAK**

(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**Respondent**

**PAMELA BONDI**

*in her official capacity as Attorney General,  
U.S. Department of Justice*

represented by **ALEX D. SILAGI**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**FRANCES C. BAJADA**

(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**JOHN FRANCIS BASIAK**

(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**Respondent**

**KRISTI NOEM**

*in her official capacity as Acting Secretary,  
U.S. Department of Homeland Security;*

represented by **ALEX D. SILAGI**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**FRANCES C. BAJADA**

(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**JOHN FRANCIS BASIAK**

(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**Respondent**

**TODD M. LYONS**

*in his official capacity as Acting Director,  
U.S. Immigration & Customs Enforcement*

represented by **ALEX D. SILAGI**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**FRANCES C. BAJADA**

(See above for address)

*LEAD ATTORNEY**ATTORNEY TO BE NOTICED***JOHN FRANCIS BASIAK**

(See above for address)

*LEAD ATTORNEY**ATTORNEY TO BE NOTICED*

<b>Date Filed</b>	<b>#</b>	<b>Docket Text</b>
11/13/2025	<u>1</u>	PETITION for Writ of Habeas Corpus ( Filing fee \$ 5 receipt number ANJDC-16820423.), filed by LAURIEDSON GONCALVES RUFO. (Attachments: # <u>1</u> Civil Cover Sheet Civil Cover Sheet)(MINOGUE, ALEXANDRA) (Entered: 11/13/2025)
11/14/2025	<u>2</u>	MOTION for Temporary Restraining Order by LAURIEDSON GONCALVES RUFO. (MINOGUE, ALEXANDRA) (Entered: 11/14/2025)
11/14/2025		Case Assigned to Judge Evelyn Padin. (mfr) (Entered: 11/14/2025)
11/14/2025	<u>3</u>	ORDER TO ANSWER; denying in part <u>2</u> Motion for TRO; that within seven (7) days of the entry of this Order, respondents shall electronically file a response to the Motion, and an answer to the Petition. Signed by Judge Evelyn Padin on 11/14/2025. (N/M) (adc, ) (Entered: 11/14/2025)
11/21/2025	<u>4</u>	RESPONSE to Petition for Writ of Habeas Corpus by PAMELA BONDI, TODD M. LYONS, KRISTI NOEM, ERIK ROKOSKY, JOHN TSOUKARIS.(SILAGI, ALEX) (Entered: 11/21/2025)
11/23/2025	<u>5</u>	BRIEF <i>REPLY</i> (MINOGUE, ALEXANDRA) (Entered: 11/23/2025)
11/25/2025	6	TEXT ORDER: This matter comes before the Court upon Petitioner Lauriedson Goncalves Rufo's Verified Petition for Writ of Habeas Corpus 28 U.S.C. § 2241 and Motion for a Temporary Restraining Order ("TRO") and Preliminary Injunctive Relief ("P.I."), D.E. 1 ("Petition"). Petitioner asserts he is unlawfully detained by immigration authorities under 28 U.S.C. § 1225(b) without a bond hearing, and that he is entitled to a bond hearing pursuant to 8 U.S.C. § 1226(a) and 8 C.F.R. § 236.1(d). The Court denied the Motion for a TRO. D.E. 3 ("Order"). Respondents filed a letter response, D.E. 4, stipulating to the facts alleged in the Petition, and acknowledging that they rely on the same statutory interpretation set forth in <i>Matter of Yajure Hurtado</i> , 29 I&N Dec. 215 (B.I.A. 2025), which this Court rejected in <i>Lomeu v. Soto</i> , No. 25-16589, 2025 WL 2981296 (D.N.J. Oct. 23, 2025). Petitioner filed a reply brief seeking release or a bond hearing. D.E. 5. Therefore, for the same reasons stated in <i>Lomeu</i> , the Court <b>GRANTS</b> the Petition and dismisses Petitioner's Motion for a P.I., D.E. 1, as <b>MOOT</b> . Respondents shall provide Petitioner a bond hearing as soon as practical but no more than <b>7 days</b> from the date of this Order. Respondents shall file a letter on the docket, within <b>3 days</b> of the bond hearing, advising the Court of the outcome. So Ordered by Judge Evelyn Padin on 11/25/2025. (bt) (Entered: 11/25/2025)

PACER Service Center

Transaction Receipt

11/28/2025 11:29:37

58

<b>PACER Login:</b>	alexandra.minogue	<b>Client Code:</b>	
<b>Description:</b>	Docket Report	<b>Search Criteria:</b>	2:25-cv-17418-EP Start date: 1/1/1980 End date: 12/1/2025
<b>Billable Pages:</b>	4	<b>Cost:</b>	0.40

# **T A B L E**

73

82

**NOVA LAW GROUP**  
21 Fulton St  
Newark, NJ 07102  
Phone (844)844-6682  
removal@nova.law

**NON-DETAINED**

**UNITED STATES DEPARTMENT OF JUSTICE  
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW  
IMMIGRATION COURT  
NEWARK, NEW JERSEY**

**In the Matter of:**

**GONCALVES-RUFO, Lauriedson**

**In removal proceedings**

**File No.: A**



**Immigration Judge: Not Assigned Yet**

**Next Hearing: To Be Determined**

**RESPONDENT'S MOTION FOR SUBSTITUTION OF COUNSEL**

GONCALVES-RUFO, Lauriedson

File No.:



TABLE OF CONTENTS

<b>TAB</b>	<b>Pages</b>
<b>A</b> Proof of Serving Prior Attorney.....	7
<b>B</b> EOIR-28 Form as Primary Attorney.....	10

UNITED STATES DEPARTMENT OF JUSTICE  
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW  
IMMIGRATION COURT  
NEWARK, NEW JERSEY

In the Matter of:

GONCALVES-RUFO, Lauriedson

In removal proceedings

File No.:



RESPONDENT'S MOTION FOR SUBSTITUTION OF COUNSEL

Respondent, through undersigned counsel, hereby moves this honorable Court and in support thereof states the following:

1. The current counsel of record, **Anita Mignone, Esq.**, no longer represents the interests of the Respondent regarding immigration matters.
2. Respondent retained the legal services of the Nova Law Group, and therefore, kindly asks this court to allow Philip Velez, Esq., the undersigned counsel, to enter an appearance on his behalf.
3. The proposed substitution of counsel conforms to applicable state bar and other ethical rules, and in compliance with 8 C.F.R. § 1003.17(b).
4. Undersigned counsel has served a copy of this motion on prior counsel as well as on the Department of Homeland Security. *See* attached Proof of Service.
5. This motion is reasonable and is not for the purpose of delay.

6. Denying this motion will prejudice Respondent as it will prevent him from being represented by the attorney of his choice.
7. Granting the motion will not prejudice the Department of Homeland Security.

THEREFORE, for good cause shown, the Court should grant this motion and allow the undersigned counsel to substitute prior counsel and become the attorney of record.

Respectfully Submitted,

Date: November 10, 2025.

\_\_\_\_\_  
Philip J. Velez, Esq.

UNITED STATES DEPARTMENT OF JUSTICE  
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW  
IMMIGRATION COURT  
NEWARK, NEW JERSEY

**In the Matter of:**  
  
**GONCALVES-RUFO, Lauriedson**  
  
**In removal proceedings**

File No.: 

**ORDER OF THE IMMIGRATION JUDGE**

Upon consideration of the Respondent's Motion for Substitution of Counsel, it is HEREBY ORDERED that the motion be  **GRANTED**  **DENIED** because:

- DHS does not oppose the motion.
- The respondent does not oppose the motion.
- A response to the motion has not been filed with the court.
- Good cause has been established for the motion.
- The court agrees with the reasons stated in the opposition to the motion.
- The motion is untimely per \_\_\_\_\_.
- Other:

**Deadlines:**

- The application(s) for relief must be filed by \_\_\_\_\_.
- The respondent must comply with DHS biometric instructions by \_\_\_\_\_.

\_\_\_\_\_  
Date  
Immigration Judge  
Certificate of Service

This document was served by :  Mail  Personal Service  
To:  Alien  Alien c/o Custodial Officer  Alien's Atty/Rep  DHS

Date: \_\_\_\_\_ By: Court Staff \_\_\_\_\_

UNITED STATES DEPARTMENT OF JUSTICE  
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW  
IMMIGRATION COURT  
NEWARK, NEW JERSEY

In the Matter of:  
GONCALVES-RUFO, Lauriedson  
In removal proceedings

File No.: A# 

**PROOF OF SERVICE**

On November 10, 2025 I, Philip Velez, Esq., served a copy of this Motion to Substitute to the DHS Office of the Principal Legal Advisor, 970 Broad Street, Room 1300, Newark, NJ 07102, via Certified Mail.

**Proof of Service on Former Counsel**

On November 10, 2025 I, Philip Velez, Esq., served a copy of this Motion to Substitute to the former Counsel, Mignone Law Firm, LLC., Anita Mignone, Esq., 250 McWhorter St, 2nd Floor, Newark, NJ 07105, via Certified Mail.

\_\_\_\_\_  
Philip J. Velez, Esq.

11/10/2025  
Date

# TAB A



November 10, 2025

Mignone Law Firm, LLC.  
Anita Mignone, Esq.

250 McWhorter St 2nd Floor  
Newark, NJ 07105

VIA USPS MAIL

Re: SUBSTITUTION OF ATTORNEY

Re:  GONCALVES-RUFO, Lauriedson

Please be advised that Mr. Rufo has retained the Nova Law Group regarding the above-captioned immigration proceedings. Mr. Rufo respectfully requests that his entire case file, including but not limited to any charging documents, evidence, statements, and any other documents about the above-captioned removal proceedings and immigration case, be provided to the undersigned Counsel.

Please see the attached Form EOIR-28, Notice of Appearance of Entry as Attorney, and a copy of the Motion to Substitute Counsel. Your office may mail or electronically mail the file to our office. If you have any questions or concerns, don't hesitate to contact our office at (844) 844-6682 or via electronic mail at [removal@nova.law](mailto:removal@nova.law).

Respectfully,

A handwritten signature in cursive script that reads 'Philip J. Velez'. The signature is written in black ink and is positioned above a horizontal line.

Philip J. Velez, Esq.  
Nova Law Group  
21 Fulton St  
Newark, NJ 07102  
[removal@nova.law](mailto:removal@nova.law)

# TAB B

U.S. Department of Justice  
 Executive Office for Immigration Review  
 Immigration Court

OMB#1125-0006  
**Notice of Entry of Appearance as Attorney or Representative Before the Immigration Court**

<p>(Type or Print)  <b>NAME AND ADDRESS OF REPRESENTED PARTY</b></p> <p>LAURIEDSON <span style="float:right">GONCALVES-RUFO</span></p> <p style="text-align:center">_____          (First) <span style="margin-left: 150px;">(Middle Initial)</span> <span style="margin-left: 150px;">(Last)</span></p> <p>_____          (Number and Street) <span style="float:right">(Apt. No.)</span></p> <p>_____          (City) <span style="margin-left: 150px;">(State)</span> <span style="margin-left: 150px;">(Zip Code)</span></p>	<p><b>A-NUMBER</b>          (Provide Alien ("A") number of the party represented in this case.)</p> <p style="text-align:center"></p> <p><b>Entry of appearance for</b>          (please check <u>one</u> of the following):</p> <p><input type="checkbox"/> All proceedings</p> <p><input type="checkbox"/> Custody and bond proceedings only</p> <p><input checked="" type="checkbox"/> All proceedings other than custody and bond proceedings</p>						
<p><b>Attorney or Representative (please check one of the following):</b></p> <p><input checked="" type="checkbox"/> I am an attorney eligible to practice law in, and a member in good standing of, the bar of the highest court(s) of the following states(s), possession(s), territory(ies), commonwealth(s), or the District of Columbia (use additional space on reverse side if necessary), and I am not subject to any order disbaring, suspending, enjoining, restraining or otherwise restricting me in the practice of law in any jurisdiction (if subject to such an order, do not check this box and explain on reverse).</p> <p>Full Name of Court <u>New York Second Division</u> Bar Number (if applicable) <u>5255591</u></p> <p><input type="checkbox"/> I am a representative accredited to appear before the Executive Office for Immigration Review as defined in 8 C.F.R. § 1292.1(a)(4) with the following recognized organization: _____</p> <p><input type="checkbox"/> I am a law student or law graduate of an accredited U.S. law school as defined in 8 C.F.R. § 1292.1(a)(2).</p> <p><input type="checkbox"/> I am a reputable individual as defined in 8 C.F.R. § 1292.1(a)(3) and I am appearing without direct or indirect remuneration.          I am providing further information in the Additional Information box below.</p> <p><input type="checkbox"/> I am an accredited foreign government official, as defined in 8 C.F.R. § 1291.1(a)(5), from _____ (country).</p> <p><input type="checkbox"/> I am a person who was authorized to practice on December 23, 1952, under 8 C.F.R. § 1292.1(b).</p>							
<p><b>Attorney or Representative (please check one of the following):</b></p> <p><input checked="" type="checkbox"/> I hereby enter my appearance as attorney or representative for, and at the request of, the party named above.</p> <p><input type="checkbox"/> EOIR has ordered the provision of a Qualified Representative for the party named above and I appear in that capacity.</p> <p>I have read and understand the statements provided on the reverse side of this form that set forth the regulations and conditions governing appearances and representations before the Immigration Court. By signing this form, I consent to publication of my name and any findings of misconduct by EOIR, should I become subject to any public discipline by EOIR pursuant to the rules and procedures at 8 C.F.R. 1003.101 <i>et seq.</i> I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.</p> <table style="width:100%; border:none;"> <tr> <td style="text-align:left"><b>SIGNATURE OF ATTORNEY OR REPRESENTATIVE</b></td> <td style="text-align:center"><b>EOIR ID NUMBER</b></td> <td style="text-align:right"><b>DATE</b></td> </tr> <tr> <td style="border-top: 1px solid black; vertical-align: bottom;"><b>X</b> _____</td> <td style="text-align:center; vertical-align: bottom;">HI002829</td> <td style="text-align:right; vertical-align: bottom;">11/10/2025</td> </tr> </table>		<b>SIGNATURE OF ATTORNEY OR REPRESENTATIVE</b>	<b>EOIR ID NUMBER</b>	<b>DATE</b>	<b>X</b> _____	HI002829	11/10/2025
<b>SIGNATURE OF ATTORNEY OR REPRESENTATIVE</b>	<b>EOIR ID NUMBER</b>	<b>DATE</b>					
<b>X</b> _____	HI002829	11/10/2025					
<p><b>NAME OF ATTORNEY OR REPRESENTATIVE, ADDRESS, FAX &amp; PHONE NUMBERS, &amp; EMAIL ADDRESS</b></p> <p>Name: Philip <span style="margin-left: 150px;">J</span> <span style="float:right">Velez</span></p> <p style="text-align:center">_____          (First) <span style="margin-left: 150px;">(Middle Initial)</span> <span style="margin-left: 150px;">(Last)</span></p> <p>Law Firm/Organization <u>Nova Law Group</u></p> <p>Address: <u>21 Fulton St</u></p> <p style="text-align:center">_____          (Number and Street)</p> <p><u>Newark</u> <span style="margin-left: 150px;">NJ</span> <span style="float:right">07102</span></p> <p style="text-align:center">_____          (City) <span style="margin-left: 150px;">(State)</span> <span style="margin-left: 150px;">(Zip Code)</span></p> <p>Telephone: <u>8448446682</u> Facsimile: _____ Email: <u>removal@nova.law</u></p> <p style="text-align:right"><input type="checkbox"/> Check here if new address</p>							

**Indicate Type of Appearance:** You must designate primary or non-primary unless you are appearing in an "on behalf of" capacity for another attorney for a specific hearing. Only the primary attorney/representative will receive mailings from the Immigration Court. All attorneys/representatives regardless of type of appearance are practitioners of record and are individually responsible as representatives for the respondent. Circumstances may arise that require the Immigration Court to designate a primary and/or switch service of mailings from the primary to a non-primary.

Primary Attorney/Representative       Non-Primary Attorney/Representative

On behalf of \_\_\_\_\_ (Attorney's Name) for the following hearing: \_\_\_\_\_ (Date)

I am providing pro bono representation. Check one:  yes  no

**Proof of Service**

I (Name) Philip J. Velez mailed, emailed or delivered a copy of this Form EOIR-28 on (Date) 11/10/2025 to the DHS (U.S. Immigration and Customs Enforcement – ICE) at 970 Broad Street, Room 1300, Newark, NJ 07102

No service needed. I electronically filed this document, and the opposing party is participating in ECAS.

**X** \_\_\_\_\_

Signature of Person Serving

**APPEARANCES** - A practitioner of record is authorized to appear on behalf of a respondent, to file documents on behalf of a respondent, and to accept service of process of all documents filed in the proceedings before the Immigration Court. See 8 C.F.R. § 1003.17(a). An attorney or Accredited Representative (with full accreditation) must register with the EOIR eRegistry in order to practice before the Immigration Court (see 8 C.F.R. § 1292.1(f)). Registration must be completed online on the EOIR website at [www.justice.gov/eoir](http://www.justice.gov/eoir). To perform the functions of and become the practitioner of record, the practitioner must file a separate Form EOIR-28 for each represented party in each case before an Immigration Judge (see 8 C.F.R. § 1003.17). A Form EOIR-28 shall be filed either as an electronic form, or as a paper form, as appropriate (for further information, please see the Immigration Court Practice Manual, which is available on the EOIR website at [www.justice.gov/eoir](http://www.justice.gov/eoir)). The attorney or representative must check the box indicating whether the entry of appearance is for custody and bond proceedings only, for all proceedings other than custody and bond, or for all proceedings including custody and bond. When an appearance as a practitioner of record is made by a person acting in a representative capacity, his/her personal appearance or signature constitutes a representation that, under the provisions of 8 C.F.R. part 1003, he/she is authorized and qualified to represent individuals and will comply with the EOIR Rules of Professional Conduct in 8 C.F.R. § 1003.102. Thereafter, substitution or withdrawal may be permitted upon the approval of the Immigration Judge of a request by the attorney or practitioner of record in accordance with 8 C.F.R. § 1003.17(b). Please note that although separate appearances in custody and non-custody proceedings are permitted, appearances for limited purposes within those proceedings – other than for document assistance to an unrepresented or pro se respondent – are not permitted. See 8 C.F.R. § 1003.2(g)(1), 1003.38(g)(2); see also *Matter of Velasquez*, 19 I&N Dec. 377, 384 (BIA 1986). A Form EOIR-61, not a Form EOIR-28, is required for the entry of a limited appearance for document assistance on an application, brief, motion, or other document before the Immigration Court. A separate appearance form (Form EOIR-27) must be filed with an appeal to the Board of Immigration Appeals (see 8 C.F.R. § 1003.38(g)). Note: Attorneys and Accredited Representatives (with full accreditation) must first update their address in eRegistry before filing a Form EOIR-28 that reflects a new address.

**FREEDOM OF INFORMATION ACT** - This form may not be used to request records under the Freedom of Information Act or the Privacy Act. The manner of requesting such records is in 28 C.F.R. §§ 16.1-16.11 and appendices. For further information about requesting records from EOIR under the Freedom of Information Act, see *How to File a Freedom of Information Act (FOIA) Request With the Executive Office for Immigration Review*, available on EOIR's website at <https://www.justice.gov/eoir>.

**PRIVACY ACT NOTICE** - The information requested on this form is authorized by 8 U.S.C. §§ 1229(a), 1362 and 8 C.F.R. § 1003.17 in order to enter an appearance to represent a party before the Immigration Court. The information you provide is mandatory and required to enter an appearance. Failure to provide the requested information will result in an inability to represent a party or receive notice of actions in a proceeding. EOIR may share this information with others in accordance with approved routine uses described in EOIR's system of records notice, EOIR-001, Records and Management Information System, 69 Fed. Reg. 26,179 (May 11, 2004), or its successors and EOIR-003, Practitioner Complaint-Disciplinary Files, 64 Fed. Reg. 49237 (September 1999). Furthermore, the submission of this form acknowledges that an attorney or representative will be subject to the disciplinary rules and procedures at 8 C.F.R. 1003.101et seq., including, pursuant to 8 C.F.R. §§ 292.3(h)(3), 1003.108(c), publication of the name of the attorney or representative and findings of misconduct should the attorney or representative be subject to any public discipline by EOIR.

**CASES BEFORE EOIR** - Automated information about cases before EOIR is available by calling (800) 898-7180 or (304) 625-2050 or by checking online at <https://acis.eoir.justice.gov>. For further information, please see the Immigration Court Practice Manual, which is available on the EOIR website at [www.justice.gov/eoir](http://www.justice.gov/eoir).

**ADDITIONAL INFORMATION:** If you are filing this form as a reputable individual as defined in 8 C.F.R. § 1292.1(a)(3), please provide a statement below how you meet that criteria, including that you are appearing on an individual basis at the request of the person entitled to representation and describing your pre-existing relationship or connection to that person.

Under the Paperwork Reduction Act, a person is not required to respond to a collection of information unless it displays a valid OMB control number. We try to create forms and instructions that are accurate, can be easily understood, and which impose the least possible burden on you to provide us with information. The estimated average time to complete this form is six (6) minutes. If you have comments regarding the accuracy of this estimate, or suggestions for making this form simpler, you can write to the Executive Office for Immigration Review, Office of the General Counsel, 5107 Leesburg Pike, Suite 2600, Falls Church, Virginia 22041.



U.S. Department of Justice

Executive Office for Immigration Review

Immigration Court

Elizabeth Immigration Court  
625 Evans Street, Room 148A  
Elizabeth, New Jersey 07201

PHILIP VELEZ, ESQ  
NOVA LAW FIRM  
21 FULTON ST  
NEWARK, NJ 07102

Name: GONCALVES RUFO, Lauriedson



Date of Notice: NOVEMBER 24, 2025

REJECTED FILING  
NOTICE TO ATTORNEY OR REPRESENTATIVE

*This notice is to inform you that the filing received by the Immigration Court on 11/24/2025 is being rejected for the reasons given below. We have returned your filing and all attachments for correction of the defects. If you return the documents, you must return them promptly to the Immigration Court. See Practice Manual Chapter 3.1(d)(i). You must also attach this rejection notice to the documents. In addition, you must serve a copy of the corrected filing on the Department of Homeland Security.*

- No Proof of Service** – The filing did not include a proof of service. An exact copy of your filing must be served on the opposing party. See *Practice Manual Chapter 3.2 and Appendix G.*
- Improper Proof of Service** – The Proof of Service does not comply with the applicable requirements. See *Practice Manual Chapter 3.2 and Appendix G.*
- No Fee Receipt, Other Proof of Payment, or Fee Waiver Request** – There is a fee required for this filing. The fee must be paid to the Department of Homeland Security. You did not provide a fee receipt, other proof of payment, or fee waiver request. See *Practice Manual Chapter 3.4.*
- Fee Incorrectly Paid to Court** – You have attached a check or money order to this filing. The Immigration Court does not accept fees. For filings that require fees, you must submit the fee to the Department of Homeland Security. See *Practice Manual Chapter 3.4.*
- No Name** – The filing is missing the respondent's name. See *Practice Manual Chapter 3.3 and Appendix F.*
- No A-Number** – The filing is missing the respondent's A-number. See *Practice Manual Chapter 3.3 and Appendix F.*

- No Notice of Entry of Appearance – No Notice of Entry of Appearance (Form EOIR-28)** has been filed indicating that you are the attorney or representative of record. Until you have filed a Form EOIR-28 with the court, you cannot represent this respondent before the court. *See Practice Manual Chapter 2.1.*
- Other Counsel Entered –** A properly filed Form EOIR-28 indicates that the respondent is presently being represented by another attorney or accredited representative. The court cannot accept your Form EOIR-28 until you either file a motion to substitute or annotate your Form EOIR-28 to reflect an "on-behalf-of" appearance or an appearance as co-counsel, as appropriate. *See Practice Manual Chapter 2.3.*
- Incorrect Filing Location (Case at Court)** This Immigration Court is not, at this time, the correct filing location. Our records indicate that the \_\_\_\_\_ Immigration Court is the correct filing location.
- Incorrect Filing Location (Case at BIA) –** This Immigration Court is not, at this time, the correct filing location. Our records indicate that the Board of Immigration Appeals is the correct filing location.
- Case not Pending –** According to our records, this case is not pending before this Immigration Court, nor does it appear in our national computer database as pending before any Immigration Court. Please check the A-number and name of the respondent and/or contact the Department of Homeland Security regarding the filing of a Notice to Appear. The Immigration Court cannot schedule a hearing or take any action unless the Department of Homeland Security has filed the charging document with the Immigration Court.
- Missing or Improper Signature –** The filing is not properly signed. Most filings require an original signature by the filing party. *See Practice Manual Chapter 3.3(b).*
- No Translation or Improper Translation –** You did not provide an English translation for a foreign language document, or you provided an improper translation. *See Practice Manual Chapter 3.3(a).*
- No Cover Page –** You did not provide a cover page. *See Practice Manual Chapter 3.3(c)(vi) and Appendix F.*
- Not Two-Hole Punched –** The filing was not two-hole punched. *See Practice Manual Chapters 3.3(c)(iv) and 3.3(c)(viii).*
- No Pagination –** The filing was not page-numbered. *See Practice Manual Chapter 3.3(c)(iii).*
- No Proposed Order –** You filed a motion seeking a ruling but did not provide a proposed order. *See Practice Manual Chapter 5.2(b) and Appendix Q.*
- Other:** \_\_\_\_\_

**The Immigration Court Practice Manual may be found at [www.usdoj.gov/eoir](http://www.usdoj.gov/eoir).**

Certificate of Service

This document was served by:     Mail     Personal Service

To:     Alien     Alien c/o Custodial Officer     Alien's Att/Rep     DHS

Date: NOV. 24 2025    By: Court Staff ALJ

Attachments:  EOIR-33     EOIR-28     Legal Services List     Other

Philip J. Velez, Esq.  
NOVA LAW FIRM  
21 Fulton St.  
Newark, NJ 07102

DETAINED

UNITED STATES DEPARTMENT OF JUSTICE  
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW  
IMMIGRATION COURT  
NEWARK, NEW JERSEY

\_\_\_\_\_ X

In the Matter of:

GONCALVES RUFO, Lauriedson

File No. ~~XXXXXXXXXX~~

Respondent

\_\_\_\_\_ X

United States Immigration Court  
970 Broad Street, Room 1200  
Newark, NJ 07102

Next Hearing: TBD

VOID  
RECEIVED  
NOV 17 2025  
IMMIGRATION COURT  
NEWARK, NJ

RESPONDENT'S APPLICATION FOR ASYLUM, WITHHOLDING OF REMOVAL  
AND CAT RELIEF

RECEIVED  
NOV 17 2025  
IMMIGRATION COURT  
NEWARK, NJ

U.S. Department of Justice  
 Executive Office for Immigration Review  
 Immigration Court

OMB#1125-0006  
**Notice of Entry of Appearance as Attorney or Representative Before the Immigration Court**

<p>(Type or Print)  <b>NAME AND ADDRESS OF REPRESENTED PARTY</b></p> <p>LAURIEDSON <span style="float:right">GONCALVES-RUFO</span></p> <p style="text-align:center">(First) <span style="margin-left: 100px;">(Middle Initial)</span> <span style="margin-left: 100px;">(Last)</span></p> <p>78 Nichols St <span style="float:right">03</span></p> <p style="text-align:center">(Number and Street) <span style="margin-left: 100px;">(Apt. No.)</span></p> <p>Newark <span style="float:right">NJ</span> <span style="float:right">07105</span></p> <p style="text-align:center">(City) <span style="margin-left: 100px;">(State)</span> <span style="margin-left: 100px;">(Zip Code)</span></p>	<p><b>A-NUMBER</b>                  (Provide Alien ("A") number of the party represented in this case.)</p> <p style="text-align:center"></p> <p><b>Entry of appearance for</b>                  (please check <u>one</u> of the following):</p> <p><input type="checkbox"/> All proceedings</p> <p><input type="checkbox"/> Custody and bond proceedings only</p> <p><input checked="" type="checkbox"/> All proceedings other than custody and bond proceedings</p>
---	---

**Attorney or Representative (please check one of the following):**

I am an attorney eligible to practice law in, and a member in good standing of, the bar of the highest court(s) of the following states(s), possession(s), territory(ies), commonwealth(s), or the District of Columbia (use additional space on reverse side if necessary), and I am not subject to any order disbaring, suspending, enjoining, restraining or otherwise restricting me in the practice of law in any jurisdiction (if subject to such an order, do not check this box and explain on reverse).

Full Name of Court New York Second Division Bar Number (if applicable) 5255591

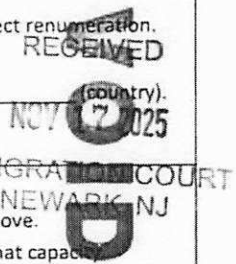
I am a representative accredited to appear before the Executive Office for Immigration Review as defined in 8 C.F.R. § 1292.1(a)(4) with the following recognized organization: \_\_\_\_\_

I am a law student or law graduate of an accredited U.S. law school as defined in 8 C.F.R. § 1292.1(a)(2).

I am a reputable individual as defined in 8 C.F.R. § 1292.1(a)(3) and I am appearing without direct or indirect remuneration. I am providing further information in the Additional Information box below.

I am an accredited foreign government official, as defined in 8 C.F.R. § 1291.1(a)(5), from \_\_\_\_\_ (country).

I am a person who was authorized to practice on December 23, 1952, under 8 C.F.R. § 1292.1(b).



**Attorney or Representative (please check one of the following):**

I hereby enter my appearance as attorney or representative for, and at the request of, the party named above.

EOIR has ordered the provision of a Qualified Representative for the party named above and I appear in that capacity.

I have read and understand the statements provided on the reverse side of this form that set forth the regulations and conditions governing appearances and representations before the Immigration Court. By signing this form, I consent to publication of my name and any findings of misconduct by EOIR, should I become subject to any public discipline by EOIR pursuant to the rules and procedures at 8 C.F.R. 1003.101 et seq. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

<b>SIGNATURE OF ATTORNEY OR REPRESENTATIVE</b>	<b>EOIR ID NUMBER</b>	<b>DATE</b>
<b>X</b>	H1002829	11/10/2025

**NAME OF ATTORNEY OR REPRESENTATIVE, ADDRESS, FAX & PHONE NUMBERS, & EMAIL ADDRESS**

Name: Philip J Velez

(First) (Middle Initial) (Last)

Law Firm/Organization Nova Law Group

Address: 21 Fulton St

(Number and Street)

Newark NJ 07102

(City) (State) (Zip Code)

Telephone: 8448446682 Facsimile: \_\_\_\_\_ Email: removal@nova.law

Check here if new address

**Indicate Type of Appearance:** You must designate primary or non-primary unless you are appearing in an "on behalf of" capacity for another attorney for a specific hearing. Only the primary attorney/representative will receive mailings from the Immigration Court. All attorneys/representatives regardless of type of appearance are practitioners of record and are individually responsible as representatives for the respondent. Circumstances may arise that require the Immigration Court to designate a primary and/or switch service of mailings from the primary to a non-primary.

Primary Attorney/Representative       Non-Primary Attorney/Representative

On behalf of \_\_\_\_\_ (Attorney's Name) for the following hearing: \_\_\_\_\_ (Date)

I am providing pro bono representation. Check one:  yes  no

**Proof of Service**

I (Name) Philip J. Velez mailed, emailed or delivered a copy of this Form EOIR-28 on (Date) 11/10/2025 to the DHS (U.S. Immigration and Customs Enforcement – ICE) at 970 Broad Street, Room 1300, Newark, NJ 07102

No service needed. I electronically filed this document, and the opposing party is participating in ECAS.

X *Bob*  
Signature of Person Serving

**APPEARANCES** - A practitioner of record is authorized to appear on behalf of a respondent, to file documents on behalf of a respondent, and to accept service of process of all documents filed in the proceedings before the Immigration Court. See 8 C.F.R. § 1003.17(a). An attorney or Accredited Representative (with full accreditation) must register with the EOIR eRegistry in order to practice before the Immigration Court (see 8 C.F.R. § 1292.1(f)). Registration must be completed online on the EOIR website at [www.eoir.gov](http://www.eoir.gov). To perform the functions of and become the practitioner of record, the practitioner must file a separate Form EOIR-28 for each represented party in each case before an Immigration Judge (see 8 C.F.R. § 1003.17). A Form EOIR-28 shall be filed either as an electronic form, or as a paper form, as appropriate (for further information, please see the Immigration Court Practice Manual, which is available on the EOIR website at [www.eoir.gov](http://www.eoir.gov)). The attorney or representative must check the box indicating whether the entry of appearance is for custody and bond proceedings only, for all proceedings other than custody and bond, or for all proceedings including custody and bond. When an appearance as a practitioner of record is made by a person acting in a representative capacity, his/her personal appearance or signature constitutes a representation that, under the provisions of 8 C.F.R. part 1003, he/she is authorized and qualified to represent individuals and will comply with the EOIR Rules of Professional Conduct in 8 C.F.R. § 1003.102. Thereafter, substitution or withdrawal may be permitted upon the approval of the Immigration Judge of a request by the attorney or practitioner of record in accordance with 8 C.F.R. § 1003.17(b). Please note that although separate appearances in custody and non-custody proceedings are permitted, appearances for limited purposes within those proceedings – other than for document assistance to an unrepresented or pro se respondent – are not permitted. See 8 C.F.R. § 1003.2(g)(1), 1003.38(g)(2); see also *Matter of Velasquez*, 19 I&N Dec. 377, 384 (BIA 1986). A Form EOIR-61, not a Form EOIR-28, is required for the entry of a limited appearance for document assistance on an application, brief, motion, or other document before the Immigration Court. A separate appearance form (Form EOIR-27) must be filed with an appeal to the Board of Immigration Appeals (see 8 C.F.R. § 1003.38(g)). Note: Attorneys and Accredited Representatives (with full accreditation) must first update their address in eRegistry before filing a Form EOIR-28 that reflects a new address.

**FREEDOM OF INFORMATION ACT** - This form may not be used to request records under the Freedom of Information Act or the Privacy Act. The manner of requesting such records is in 28 C.F.R. §§ 16.1-16.11 and appendices. For further information about requesting records from EOIR under the Freedom of Information Act, see How to File a Freedom of Information Act (FOIA) Request With the Executive Office for Immigration Review, available on EOIR's website at [www.eoir.gov](http://www.eoir.gov).

**PRIVACY ACT NOTICE** - The information requested on this form is authorized by 8 U.S.C. §§ 1229(a), 1362 and 8 C.F.R. § 1003.17 in order to enter an appearance to represent a party before the Immigration Court. The information you provide is mandatory and required to enter an appearance. Failure to provide the requested information will result in an inability to represent a party or receive notice of actions in a proceeding. EOIR may share this information with others in accordance with approved routine uses described in EOIR's system of records notice, EOIR-001, Records and Management Information System, 59 Fed. Reg. 26,179 (May 11, 2004), or its successors and EOIR-003, Practitioner Complaint-Disciplinary Files, 64 Fed. Reg. 49,237 (September 1999). Furthermore, the submission of this form acknowledges that an attorney or representative will be subject to the disciplinary rules and procedures at 8 C.F.R. 1003.101et seq., including, pursuant to 8 C.F.R. §§ 292.3(h)(3), 1003.108(c), publication of the name of the attorney or representative and findings of misconduct should the attorney or representative be subject to any public discipline by EOIR.

**CASES BEFORE EOIR** - Automated information about cases before EOIR is available by calling (800) 898-7180 or (304) 625-2050 or by checking online at [www.eoir.gov](http://www.eoir.gov). For further information, please see the Immigration Court Practice Manual, which is available on the EOIR website at [www.eoir.gov](http://www.eoir.gov).

**ADDITIONAL INFORMATION:** If you are filing this form as a reputable individual as defined in 8 C.F.R. § 1292.1(a)(3), please provide a statement below how you meet that criteria, including that you are appearing on an individual basis at the request of the person entitled to representation and describing your pre-existing relationship or connection to that person.

Under the Paperwork Reduction Act, a person is not required to respond to a collection of information unless it displays a valid OMB control number. We try to create forms and instructions that are accurate, can be easily understood, and which impose the least possible burden on you to provide us with information. The estimated average time to complete this form is six (6) minutes. If you have comments regarding the accuracy of this estimate, or suggestions for making this form simpler, you can write to the Executive Office for Immigration Review, Office of the General Counsel, 5107 Leesburg Pike, Suite 2600, Falls Church, Virginia 22041.

Philip J. Velez, Esq.  
NOVA LAW FIRM  
21 Fulton St.  
Newark, NJ 07102

DETAINED

UNITED STATES DEPARTMENT OF JUSTICE  
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW  
IMMIGRATION COURT  
NEWARK, NEW JERSEY

\_\_\_\_\_ X

In the Matter of:

GONCALVES RUFO, Lauriedson

File No



Respondent

\_\_\_\_\_ X

United States Immigration Court  
970 Broad Street, Room 1200  
Newark, NJ 07102

Next Hearing: TBD

RESPONDENT'S APPLICATION FOR ASYLUM, WITHHOLDING OF REMOVAL  
AND CAT RELIEF

INDEX

Table of Contents

Index	Pg. 2
Certificate of Service	Pg. 3
Application	Pgs. 4-15

Philip J. Velez, Esq.  
NOVA LAW FIRM  
21 Fulton St.  
Newark, NJ 07102

DETAINED

UNITED STATES DEPARTMENT OF JUSTICE  
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW  
IMMIGRATION COURT  
NEWARK, NEW JERSEY

\_\_\_\_\_ X

In the Matter of:

GONCALVES RUFO, Lauriedson

File No.



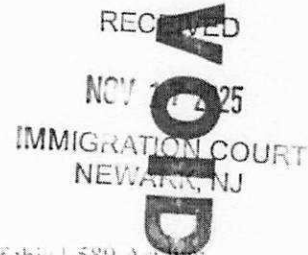
Respondent

\_\_\_\_\_ X

United States Immigration Court  
970 Broad Street, Room 1200  
Newark, NJ 07102

Next Hearing: TBD

CERTIFICATE OF SERVICE



I, Philip J. Velez, Esq., certify that on November 13, 2025, I served a copy of this I-589 Asylum Application and all attached pages via USPS Priority Mail Express to the Department of Homeland Security, Office of Chief Counsel, at the following address: 970 Broad Street, Room 1300, Newark, NJ 07102.

\_\_\_\_\_  
Philip J. Velez

11/13/2025  
Date

**TAB F**

UNITED STATES DEPARTMENT OF JUSTICE  
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW  
IMMIGRATION COURT  
900 MARKET STREET, SUITE 504  
PHILADELPHIA, PA 19107

GONCALVES-RUFO, LAURIEDSON



in the matter of  
GONCALVES-RUFO, LAURIEDSON

File A



DATE: Sep 30, 2024

- Unable to forward - No address provided.
  - Attached is a copy of the decision of the Immigration Judge. This decision is final unless an appeal is filed with the Board of Immigration Appeals within 30 calendar days of the date of the mailing of this written decision. See the enclosed forms and instructions for properly preparing your appeal. Your notice of appeal, attached documents, and fee or fee waiver request must be mailed to: Board of Immigration Appeals  
Office of the Clerk  
5107 Leesburg Pike, Suite 1000  
Falls Church, VA 22041
  - Attached is a copy of the decision of the immigration judge as the result of your Failure to Appear at your scheduled deportation or removal hearing. This decision is final unless a Motion to Reopen is filed in accordance with Section 242b(c)(3) of the Immigration and Nationality Act, 8 U.S.C. § 1252b(c)(3) in deportation proceedings or section 240(b)(5)(C), 8 U.S.C. § 1229a(b)(5)(C) in removal proceedings. If you file a motion to reopen, your motion must be filed with this court:  
IMMIGRATION COURT  
900 MARKET STREET, SUITE 504  
PHILADELPHIA, PA 19107
  - Attached is a copy of the decision of the immigration judge relating to a Reasonable Fear Review. This is a final order. Pursuant to 8 C.F.R. § 1208.31(g)(1), no administrative appeal is available. However, you may file a petition for review within 30 days with the appropriate Circuit Court of Appeals to appeal this decision pursuant to 8 U.S.C. § 1252; INA §242.
  - Attached is a copy of the decision of the immigration judge relating to a Credible Fear Review. This is a final order. No appeal is available.
- Other: Motion to reopen

S.Jankanish  
COURT CLERK  
IMMIGRATION COURT

EF

cc: DHS OFFICE OF THE CHIEF COUNSEL  
900 MARKET STREET, SUITE 346  
PHILADELPHIA, PA, 19107

UNITED STATES DEPARTMENT OF JUSTICE  
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW  
UNITED STATES IMMIGRATION COURT  
PHILADELPHIA, PENNSYLVANIA

IN THE MATTER OF: ) IN REMOVAL PROCEEDINGS  
 )  
LAURIEDSON GONCALVES RUFO ) File No: [REDACTED]  
Respondent )

**CHARGES:** Section 212(a)(6)(A)(i) of the Act, as amended, as an alien present in the United States without being admitted or paroled, or who has arrived in the United States at any time or place other than as designated by the Attorney General.

**APPLICATION:** Respondents' Motions to Reopen

APPEARANCES

ON BEHALF OF RESPONDENT: ANITA MIGNONE, ESQ.  
ON BEHALF OF THE GOVERNMENT: NICOLE PEDICINO, ESQ.

INTERLOCUTORY DECISION AND ORDER OF THE IMMIGRATION JUDGE

I. Procedural History

Respondent is a male, citizen of Brazil, born [REDACTED]. Respondent entered the United States without inspection on or about July 10, 2016, with his father, Exh. 1. Respondent was apprehended by Immigration and Customs Enforcement ("ICE") and personally served a Notice to Appear, dated July 13, 2016. The NTA did not provide a date, time or location of hearing. See Exh. 1. The NTA was filed with the Philadelphia Court on August 10, 2016. Id. On August 16, 2016, the Philadelphia Immigration Court mailed a hearing notice to the address [REDACTED]. The hearing notice ordered Respondent to appear at the Philadelphia Immigration Court for his master calendar hearing on September 6, 2016, at 8:30 a.m. Exh. 2. Respondent failed to appear for that hearing. To establish alienage and removability the DHS served an I-213. Exh. 3. The Court found he had proper notice of the hearing

and sustained the charge of removability and ordered him removed to Brazil. See Exh. 4. The removal order was mailed to Respondent's father, Antonio.

Respondent, *through counsel*, filed a Motion to Reopen and Rescind *In Absentia* Order on August 26, 2024. Exh. 5. DHS filed its opposition on August 28, 2024. Exh. 6. DHS argues that Respondent did not exercise due diligence in filing the MTR, given his removal order was entered 8 years ago and he was aware that he was in removal proceedings. Further, DHS notes Respondent has not provided "exceptional circumstances to warrant sua sponte reopening.

## II. Exhibits List

- Exhibit 1: NTA
- Exhibit 2: Hearing Notice
- Exhibit 3: I-213
- Exhibit 4: Respondents' *In Absentia* Removal Order, dated August 10, 2017
- Exhibit 5: Respondent's Motion to Reopen and Rescind *In Absentia* Removal Order for Respondent, filed August 23, 2024
- Exhibit 6: DHS's Opposition to Respondents' Motion to Reopen Removal Order Entered *In Absentia*

## III. Discussion

The Court finds that it can most expeditiously address the request to reopen pursuant to its *sua sponte* authority. Under this authority, the Court may reopen any case in which it has decided, unless jurisdiction is vested with the Board. 8 C.F.R. § 1003.23 (b)(1). The *sua sponte* authority to reopen a decision may be exercised only where there are "exceptional situations." Matter of J-J-, 21 I&N Dec. 976, 984 (BIA 1997); see also Quintanilla Suarez v. Att'y Gen., 299 Fed. Appx. 153 (3d Cir. 2008) (unpublished). This requirement promotes finality of decisions, as a Court's *sua sponte* power "is not meant to be used as a general cure for filing defects or to otherwise circumvent the regulations." 21 I&N Dec. at 984. Cases where the Board has found exceptional situations sufficient to warrant reopening typically include cases where there has been a compelling and fundamental change in the law warranting extraordinary intervention; or in cases where reopening would result in a substantial likelihood that the result of the case would be changed if reopening is granted. See Matter of G-D-, 22 I&N Dec. 1216, 1219 (BIA 2000).

Respondent's case constitutes an "exceptional situation" warranting the exercise of the Court's *sua sponte* authority to reopen. Here, Respondent was placed into removal proceedings when he was a seventeen-year-old child. The hearing notice was sent to his father Antonio. There is nothing in the record to indicate this Respondent was ever advised by his father that he had any immigration hearing. As a child, he was reliant on his father to give him information about his case. As a child, he relied on his father to fully apprise him of his responsibility to attend hearings.

attention to her son's case. Given the Court's concern that this child was not adequately provided information about the status of his case and his duty and responsibility to attend hearings and may not have been adequately directed by his father, the Court is not fully convinced that he had adequate notice of his hearing or was apprised by his father as to the status of his immigration case. Overriding all these concerns is the clear fact that Respondent was a child when he was ordered deported in absentia and may not have been aware of his responsibility to attend all hearings or risk being removed and may not have been told by the adults in his life that he needed to be at his hearing. Further, Respondent is married to a U.S. citizen, has no criminal record and is prima facie eligible to see an I-601A waiver.

Accordingly, the following order shall be entered:

ORDER

**ORDER:** IT IS ORDERED that Respondent's Motion to Reopen and Rescind the *In Absentia* Order be and hereby is GRANTED.

JOHN  
CARLE

Digitally signed  
by JOHN CARLE  
Date:  
2024.09.30  
10:25:12 -04'00'

---

JOHN B. CARLE  
U.S Immigration Judge  
Philadelphia, Pennsylvania

# TAB G

111

120

Department of Homeland Security  
US Immigration and Customs Enforcement  
970 Broad St, 11<sup>th</sup> floor  
Newark, New Jersey 07102



Lauriedson GONCALVES RUFO



File#



Date: 10/27/2025

Please come to the office shown below at the time and place indicated in connection with an official matter:

Office Location	970 Broad St, 11 <sup>th</sup> floor Newark, New Jersey 07102
Date and Hour	November 13, 2025 at 8:00 am
Ask for	Deportation Officer
Reason for appointment	Reporting
Bring with you	All paperwork issued by Immigration & Customs Enforcement

IT IS IMPORTANT THAT YOU KEEP THIS APPOINTMENT AND BRING THIS LETTER WITH YOU.

**Warning:** Failure to report may result in the issuance of a warrant for your arrest and cause you to be classified as fugitive. Appearance dates generally will not be re-scheduled unless you are able to establish that exceptional circumstances prevent you from reporting on the date set forth above. The term "Exceptional Circumstances" such as your serious illness or the serious illness or death of your spouse, child, or parent, but not including less compelling circumstances beyond your Control.

Department of Homeland Security  
US Immigration and Customs Enforcement  
970 Broad St, 11<sup>th</sup> floor  
Newark, New Jersey 07102



Lauriedson GONCALVES RUFO



File#:



Date: 10/06/2025

Please come to the office shown below at the time and place indicated in connection with an official matter:

Office Location	970 Broad St, 11 <sup>th</sup> floor Newark, New Jersey 07102
Date and Hour	October 18, 2025 at 8:00 am
Ask for	Deportation Officer
Reason for appointment	Reporting
Bring with you	All paperwork issued by Immigration & Customs Enforcement

**IT IS IMPORTANT THAT YOU KEEP THIS APPOINTMENT AND BRING THIS LETTER WITH YOU**

**Warning:** Failure to report may result in the issuance of a warrant for your arrest and cause you to be classified as fugitive. Appearance dates generally will not be re-scheduled unless you are able to establish that exceptional circumstances prevent you from reporting on the date set forth above. The term "Exceptional Circumstances" such as your serious illness or the serious illness or death of your spouse, child, or parent, but not including less compelling circumstances beyond your Control.

UNITED STATES DEPARTMENT OF JUSTICE  
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW  
IMMIGRATION COURT  
ELIZABETH, NEW JERSEY

In the Matter of:

GONCALVES-RUFO, Lauriedson

In Removal Proceedings.

File No.: A



**PROOF OF SERVICE**

No service needed. I electronically filed the attached documents in support of bond, and the opposing party is participating in ECAS.

*Philip J. Velez*

Philip Velez, Esq.

DATE: 12/01/25

## **EXHIBIT C**

UNITED STATES DEPARTMENT OF JUSTICE  
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW  
IMMIGRATION COURT  
900 MARKET STREET, SUITE 504  
PHILADELPHIA, PA 19107

GONCALVES-RUFO, LAURIEDSON



In the matter of  
GONCALVES-RUFO, LAURIEDSON

File



DATE: Sep 30, 2024

- Unable to forward - No address provided.
  - Attached is a copy of the decision of the Immigration Judge. This decision is final unless an appeal is filed with the Board of Immigration Appeals within 30 calendar days of the date of the mailing of this written decision. See the enclosed forms and instructions for properly preparing your appeal. Your notice of appeal, attached documents, and fee or fee waiver request must be mailed to:  
Board of Immigration Appeals  
Office of the Clerk  
5107 Leesburg Pike, Suite 2000  
Falls Church, VA 22041
  - Attached is a copy of the decision of the immigration judge as the result of your Failure to Appear at your scheduled deportation or removal hearing. This decision is final unless a Motion to Reopen is filed in accordance with Section 242b(c)(3) of the Immigration and Nationality Act, 8 U.S.C. § 1252b(c)(3) in deportation proceedings or section 240(c)(5)(C), 8 U.S.C. § 1229a(b)(5)(C) in removal proceedings. If you file a motion to reopen, your motion must be filed with this court:  
IMMIGRATION COURT  
900 MARKET STREET, SUITE 504  
PHILADELPHIA, PA 19107
  - Attached is a copy of the decision of the immigration judge relating to a Reasonable Fear Review. This is a final order. Pursuant to 8 C.F.R. § 1208.31(g)(1), no administrative appeal is available. However, you may file a petition for review within 30 days with the appropriate Circuit Court of Appeals to appeal this decision pursuant to 8 U.S.C. § 1252; INA §242.
  - Attached is a copy of the decision of the immigration judge relating to a Credible Fear Review. This is a final order. No appeal is available.
- Other: Motion to reopen

S. Jankanish  
COURT CLERK  
IMMIGRATION COURT

FF

cc: DHS OFFICE OF THE CHIEF COUNSEL  
900 MARET STREET, SUITE 346  
PHILDEALPHIA, PA, 19107

UNITED STATES DEPARTMENT OF JUSTICE  
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW  
UNITED STATES IMMIGRATION COURT  
PHILADELPHIA, PENNSYLVANIA

IN THE MATTER OF: ) IN REMOVAL PROCEEDINGS  
LAURIEDSON GONCALVES RUFO ) File No: [REDACTED]  
Respondent )

**CHARGES:** Section 212(a)(6)(A)(i) of the Act, as amended, as an alien present in the United States without being admitted or paroled, or who has arrived in the United States at any time or place other than as designated by the Attorney General.

**APPLICATION:** Respondents' Motions to Reopen

APPEARANCES

ON BEHALF OF RESPONDENT: ) ON BEHALF OF THE GOVERNMENT:  
*Anita Mignone, Esq.* ) *Nicole Pedicino, Esq.*

INTERLOCUTORY DECISION AND ORDER OF THE IMMIGRATION JUDGE

I. Procedural History

Respondent is a male, citizen of Brazil, born [REDACTED] Respondent entered the United States without inspection on or about July 10, 2016, with his father. Exh. 1. Respondent was apprehended by Immigration and Customs Enforcement ("ICE") and personally served a Notice to Appear, dated July 13, 2016. The NTA did not provide a date, time or location of hearing. See Exh. 1. The NTA was filed with the Philadelphia Court on August 10, 2016. Id. On August 16, 2016, the Philadelphia Immigration Court mailed a hearing notice to the address [REDACTED]. The hearing notice ordered Respondent to appear at the Philadelphia Immigration Court for his master calendar hearing on September 6, 2016, at 8:30 a.m. Exh. 2. Respondent failed to appear for that hearing. To establish alienage and removability the DHS served an I-213. Exh. 3. The Court found he had proper notice of the hearing

and sustained the charge of removability and ordered him removed to Brazil. See Exh. 4. The removal order was mailed to Respondent's father, Antonio.

Respondent, *through counsel*, filed a Motion to Reopen and Rescind *In Absentia* Order on August 26, 2024. Exh. 5. DHS filed its opposition on August 28, 2024. Exh. 6. DHS argues that Respondent did not exercise due diligence in filing the MTR, given his removal order was entered 8 years ago and he was aware that he was in removal proceedings. Further, DHS notes Respondent has not provided "exceptional circumstances to warrant sua sponte reopening.

## II. Exhibits List

- Exhibit 1: NTA
- Exhibit 2: Hearing Notice
- Exhibit 3: I-213
- Exhibit 4: Respondents' *In Absentia* Removal Order, dated August 10, 2017
- Exhibit 5: Respondent's Motion to Reopen and Rescind *In Absentia* Removal Order for Respondent, filed August 23, 2024
- Exhibit 6: DHS's Opposition to Respondents' Motion to Reopen Removal Order Entered *In Absentia*

## III. Discussion

The Court finds that it can most expeditiously address the request to reopen pursuant to its *sua sponte* authority. Under this authority, the Court may reopen any case in which it has decided, unless jurisdiction is vested with the Board. 8 C.F.R. § 1003.23 (b)(1). The *sua sponte* authority to reopen a decision may be exercised only where there are "exceptional situations." Matter of J-J-, 21 I&N Dec. 976, 984 (BIA 1997); see also Quintanilla Suarez v. Att'y Gen., 299 Fed. Appx. 153 (3d Cir. 2008) (unpublished). This requirement promotes finality of decisions, as a Court's *sua sponte* power "is not meant to be used as a general cure for filing defects or to otherwise circumvent the regulations." 21 I&N Dec. at 984. Cases where the Board has found exceptional situations sufficient to warrant reopening typically include cases where there has been a compelling and fundamental change in the law warranting extraordinary intervention; or in cases where reopening would result in a substantial likelihood that the result of the case would be changed if reopening is granted. See Matter of G-D-, 22 I&N Dec. 1216, 1219 (BIA 2000).

Respondent's case constitutes an "exceptional situation" warranting the exercise of the Court's *sua sponte* authority to reopen. Here, Respondent was placed into removal proceedings when he was a seventeen-year-old child. The hearing notice was sent to his father Antonio. There is nothing in the record to indicate this Respondent was ever advised by his father that he had any immigration hearing. As a child, he was reliant on his father to give him information about his case. As a child, he relied on his father to fully apprise him of his responsibility to attend hearings.

attention to her son's case. Given the Court's concern that this child was not adequately provided information about the status of his case and his duty and responsibility to attend hearings and may not have been adequately directed by his father, the Court is not fully convinced that he had adequate notice of his hearing or was apprised by his father as to the status of his immigration case. Overriding all these concerns is the clear fact that Respondent was a child when he was ordered deported in absentia and may not have been aware of his responsibility to attend all hearings or risk being removed and may not have been told by the adults in his life that he needed to be at his hearing. Further, Respondent is married to a U.S. citizen, has no criminal record and is prima facie eligible to see an I-601A waiver.

Accordingly, the following order shall be entered:

**ORDER**

**ORDER:** IT IS ORDERED that Respondent's Motion to Reopen and Rescind the *In Absentia* Order be and hereby is GRANTED.

**JOHN** Digitally signed  
by JOHN CARLE  
Date:  
**CARLE** 2024.09.30  
10:25:12 -04'00'

---

JOHN B. CARLE  
U.S Immigration Judge  
Philadelphia, Pennsylvania