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UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
IMMIGRATION COURT
HARLINGEN, TEXAS

In the Matter of:

NAME

In Removal Proceedings

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A#

Immigration Judge: Hon. Charlotte Brown

Individual hearing: DATE

**RESPONDENT'S MOTION FOR SUMMARY GRANT OF I-589 AND BRIEF
IN SUPPORT THEREOF**

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**RESPONDENT’S MOTION FOR SUMMARY GRANT OF I-589 AND BRIEF
IN SUPPORT THEREOF**

COMES NOW the respondent, X, A#, by and through his attorney of record, Jodi Goodwin, and respectfully submits the following Motion for Summary Grant of I-589 and Brief in Support Thereof for this Court’s consideration in support of Mr. X’s Application for Withholding of Removal and Relief under Article III of the United Nations Convention Against Torture.

I. INTRODUCTION

Mr. X is a 47 year-old citizen of Mexico. He fled his home in Nuevo Laredo, Mexico, in or around 1999 after he received multiple death threats from members of the “Los Texas” and the Gulf cartels. Since his entry in 1999 Mr. X has received news that colleagues have been disappeared and, in 2016, a family member’s body was found one week after he went missing. It was discovered that he was executed but the authorities in Nuevo Laredo, Mexico have failed to release further information.

In 1990 Mr. X joined a special security force called the “Cobra group” under the Mexican Department of Public Safety in Nuevo Laredo, Tamaulipas, Mexico. In 1995, Mr. X and other members of the Cobra group took part in the apprehension and transfer of Guillermo Martinez

(also known as “El Borrado”) after he killed the Commander of the Mexican Federal Judicial Police, Luis del Moral Samudio. El Borrado was a drug dealer and brother of, Arturo Martinez Herrera, the leader of Los Texas cartel. Mr. X’s involvement in the apprehension and transfer of El Borrado was well known in Mexico as it was released to the public via the local news. After his apprehension, a war broke out between Los Texas and the Gulf Cartel. Mr. X received threats from the Gulf Cartel and Los Texas because they both wanted him to work for them. The cartels began bribing the police and members of the Cobra Group and gained a considerable number of agents who supported them. Mr. X was then harassed and threatened by law enforcement agents who worked for both cartels because he refused to work for either of them. After a while Mr. X noticed that his colleagues and police officers who had refused to work for the cartels began disappearing. After this, Mr. X began preparing to enter the United States. In December 1999, Mr. X was issued an H-2B visa at the American Consulate in Mexico and lawfully entered the United States.

Mr. X fears returning to Mexico because he believes the men that threatened to kill him in the 1990s have risen in the ranks of the cartels. He has heard that many of them have assumed powerful positions and has reason to believe they have not relented in their endeavors to fulfill their threats. Mr. X has heard of colleagues who worked with him in the Cobra Group being disappeared and murdered. Also, in 2016, Mr. X’s cousin, Y, was executed by the cartel. He was working at a gas station as an attendant at the time when he was kidnapped and went missing for about a week before the authorities found his body. They have not given his family any further information about the incident.

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