



Jackie Watson <jackie@tomesparza.com>

errors in transcript of case now on appeal to BIA

4 messages

Virginia Raymond <virginiaraymond@austin.rr.com>
To: KARNES PRO BONO <karnesprobono@akingump.com>
Cc: Victoria Rossi <vicrossi@gmail.com>

Tue, Jun 23, 2015 at 5:26 PM

Hello friends,

I'm just now reading the transcript (that arrived yesterday) of a merits hearing that we lost. Thus far I have come across two errors reversing the meaning of what someone said.

ERROR ONE:

..... the transcript has Judge Martinez saying, "...I would have granted..." when he clearly told me "...I would not have granted it but..." (a motion for me to be allowed to take my client to San Antonio so that she could show him the scars inflicted on her by the persecutor)
(This may be harmless b/c the decision did not turn on credibility of my client, or what the persecutor did to my client, but on the issues of
a) reasonable relocation within her very large country, and
b) whether the persecution was based on her imputed political opinion, or whether, as Judge M decided, the perp was not a vengeful, violent man with a personal grudge

and

ERROR TWO:

when the ICE deportation officer entering, the transcript has him saying,

"....I am not Officer Fernandez"

when he WAS officer Fernandez and said so....
(the issue here is intimidation by deportation officer)

QUESTION TO Y'ALL

What do I do? Ask BIA to listen to the tape its own BIA-self?

Virginia Marie Raymond
Lawyer/Abogada
1006 East César Chávez Street
Austin, Texas 78702
512.472.6270 office
512.748.0940 cell
512.472.8263 fax
www.virginiaraymond.com
virginiaraymond@austin.rr.com

The information contained in this e-mail message is intended only for the personal and confidential use of the recipient(s) named above. If you have received this communication in error, please notify us immediately by e-mail, and delete the original message.

Jackie Watson <jackie@tomesparza.com>

Tue, Jun 23, 2015 at 5:53 PM

To: Virginia Raymond <virginiaraymond@austin.rr.com>

Cc: KARNES PRO BONO <karnesprobono@akingump.com>, Victoria Rossi <vicrossi@gmail.com>

See the BIA practice manual at Ch. 4.2(f)(iii). You can file a Request to Correct the Transcript, but it won't toll any briefing due date. And/or you can bring up the parts of the transcript in your brief that are incorrect and argue how they prejudice the case. The clerk working on the case probably will review the DAR if you bring it up in the brief. Or maybe I'm naive. Best, Jackie

Jacqueline L. Watson, Esq.

Law Office of Thomas Esparza, Jr., P.C.

1811 South First Street

Austin, Texas 78704

Tel. (512) 441-0062

Fax (512) 441-0725

jackie@tomesparza.com

Board Certified in Immigration and Nationality Law by the Texas Board of Legal Specialization

CONFIDENTIALITY NOTICE

This message is sent by an attorney, and is intended exclusively for the entity, corporal or otherwise, to whom it is addressed. This communication may contain information that is proprietary, privileged, confidential, or otherwise legally exempt from disclosure. If you are not the named addressee, you are not authorized to read, print, retain, copy, taste, smell, or disseminate this message. If you have received this message in error, please hide your eyes and weep, and then kindly notify the sender and shame her. And hit delete. You're the best.



[Quoted text hidden]

Virginia Raymond <virginiaraymond@austin.rr.com>

Tue, Jun 23, 2015 at 6:04 PM

To: Jackie Watson <jackie@tomesparza.com>

This is SO helpful, Jackie. Thank you!!!

Virginia Marie Raymond
Lawyer/Abogada
1006 East César Chávez Street
Austin, Texas 78702
512.472.6270 office
512.748.0940 cell
512.472.8263 fax

[Quoted text hidden]

Jackie Watson <jackie@tomesparza.com>
To: Virginia Raymond <virginiaraymond@austin.rr.com>

Tue, Jun 23, 2015 at 6:05 PM

Anytime!

Jacqueline L. Watson, Esq.
Law Office of Thomas Esparza, Jr., P.C.

1811 South First Street

Austin, Texas 78704

Tel. (512) 441-0062

Fax (512) 441-0725

jackie@tomesparza.com

Board Certified in Immigration and Nationality Law by the Texas Board of Legal Specialization
American Immigration Lawyers Association Texas Chapter Chair, 2015-2016

CONFIDENTIALITY NOTICE

This message is sent by an attorney, and is intended exclusively for the entity, corporal or otherwise, to whom it is addressed. This communication may contain information that is proprietary, privileged, confidential, or otherwise legally exempt from disclosure. If you are not the named addressee, you are not authorized to read, print, retain, copy, taste, smell, or disseminate this message. If you have received this message in error, please hide your eyes and weep, and then kindly notify the sender and shame her. And hit delete. You're the best.



[Quoted text hidden]