

October 5, 2022

Hon. Merrick B. Garland
Attorney General,
Department of Justice
950 Pennsylvania Avenue,
NW, Washington, DC 20530

Hon. Alejandro N. Mayorkas
Secretary, Department of
Homeland Security
2707 Martin Luther King Jr. Ave.,
SE, Washington, DC 20528

Betsy Lawrence
Deputy Assistant to the
President for Immigration
Domestic Policy Council
1600 Pennsylvania Ave. NW,
Washington, DC 20500

Re: Grave Concerns Related to the Dedicated Docket for Families and Request for Immediate Action

To Attorney General Garland, Secretary Mayorkas, and Deputy Assistant Lawrence:

On May 28, 2021, the Departments of Justice (DOJ) and Homeland Security (DHS) jointly launched a “Dedicated Docket” to quickly process the cases of families seeking asylum in the United States who entered between ports of entry.¹ We write to express our grave concerns with how this initiative has played out in its first year. The undersigned 106 legal service providers, court observers, and allied organizations located in the cities where the Dedicated Docket now operates. Together, we have observed hundreds of cases on the Dedicated Docket throughout the country. Our collective experience reveals a process rife with unfairness: lack of legal representation, expedited and arbitrary timelines, removal orders against pro se respondents (including young children), as well as courts marked by confusion and in some cases hostility. We urge the administration to end the Dedicated Docket and otherwise take immediate actions detailed below to address these concerns and ensure a fair process for all families seeking protection in our courts.

- I. Due Process Failures on the Dedicated Docket 2**
 - A. Lack of Access to Legal Representation 2**
 - 1. Non-profit organizations and law school clinics 2
 - 2. Private bar 3
 - 3. Notario fraud 3
 - B. Expedited and Arbitrary Timelines 4**
 - 1. Scheduling of hearings 4
 - 2. Preparation and filing of asylum applications 5
 - C. Removal Orders 5**
 - 1. In absentia 5
 - 2. Failure to submit I-589 6
 - D. Courtroom Atmosphere 7**
 - 1. Hostile treatment 7
 - 2. Special safeguards for children 7
- II. Recommendations 8**

¹ See [DHS and DOJ Announce Dedicated Docket Process for More Efficient Immigration Hearings](#), May 28, 2021.

I. Due Process Failures on the Dedicated Docket

A. Lack of Access to Legal Representation

Legal representation is crucial.² Yet most respondents on the Dedicated Docket lack access to counsel. This should come as no surprise. In June 2021, legal service providers and allied organizations from the initial ten cities designated for a Docket shared “unequivocally that the capacity to provide pro bono legal services in each of these cities is already unable to keep up with the demand for legal services from people facing removal hearings and unable to secure representation from the private bar.”³ They warned that adding a fast-track docket would only worsen the already significant barriers to legal representation in removal proceedings.⁴ Our experience this past year has borne out that fact: the vast majority of people we have observed on the Docket lack legal representation. This aligns with data released in January 2022 by the Transactional Research Access Clearinghouse (TRAC), finding only 15.5% of asylum seekers assigned to the Docket nationwide had counsel,⁵ and Executive Office for Immigration Review (EOIR) data showing a representation rate of 51% by July of this year, with over 20,000 pending cases still lacking counsel.⁶

Below, we describe in more detail why non-profit organizations, law school clinics, and the private bar are unable to meet the need for representation on the docket, particularly in the context of expedited timelines and the COVID-19 pandemic. We also show how notarios are coming in to fill the gap in some cities, leading to adverse outcomes for families on the docket.

1. Non-profit organizations and law school clinics

Many non-profit organizations and law school clinics that provide pro bono legal services, already struggling to serve the many people moving forward unrepresented in removal proceedings, are unable to assist families seeking asylum in their complex and fast-tracked cases on the Dedicated Docket.

Examples from the various cities provide a window into this struggle: In Boston, one legal service provider reported that they completed over 30 intakes for those on the Dedicated Docket, but they had the capacity to provide representation in only one of those cases. In San Francisco, on average, pro se respondents on the Docket receive continuances of about 6-8 weeks until their next master calendar hearings. But non-profit organizations will often schedule consultations months out, which means they show up to their following hearings without having consulted with an attorney. In any event, securing an intake does not guarantee representation as many organizations lack capacity, including those included

² See Ingrid V. Eagly & Steven Shafer, *A National Study of Access to Counsel in Immigration Court*, 164 U. Pa. L. Rev. 1, 9 (2015) (“Among similarly situated respondents, the odds were fifteen times greater that immigrants with representation, as compared to those without, sought relief and five-and-a-half times greater that they obtained relief from removal.”).

³ See [Letter of Legal Services Providers to Department of Homeland Security, Department of Justice, and White House re Dedicated Dockets](#), June 21, 2021, at 2.

⁴ *Id.* 2-3.

⁵ See TRAC, [Unrepresented Families Seeking Asylum on "Dedicated Docket" Ordered Deported by Immigration Courts](#).

⁶ See EOIR, [Dedicated Docket Representation Rates](#), July 1, 2022. The EOIR statistics are notable in another respect: They show that only 8% of pending Dedicated Docket cases (3,848 out of 47,993 cases nationwide) made it to a merits hearing as of July 2022, and that of those 87% of respondents had counsel. These statistics reveal, consistent with our observations, that pro se families on the docket struggle to navigate the court process, submit their asylum applications, and reach the merits stage of their cases. By contrast, those with legal representation are far more able to receive a full merits hearing on their claims.

on the EOIR list provided to respondents (in fact, one of the organizations listed—Kids in Need of Defense (KIND)—does not represent families at all).

In Los Angeles, a recent report released by the Center for Immigration Law and Policy at UCLA School of Law revealed that 70% of people on the Dedicated Docket were unrepresented as of February 1, 2022.⁷ Families described calling each of the 11 non-profit organizations on EOIR’s pro bono list, only to find that none had capacity to represent them.

For those families who are able to access legal help from non-profit organizations, it is often in a form that falls short of actual representation. These programs, some of which are run by undersigned organizations—including Legal Orientation Programs (LOP), Attorney of the Day (AOD), and Immigration Court Help Desks—“although important resources for the *pro se* population, are insufficient measures in this context.”⁸ This also includes Friend of Court programs. As EOIR recently confirmed, where such a program exists, its role is limited: “[B]ecause the Friend of the Court is not a representative of a party in proceedings, the Friend of the Court cannot submit any filings in a case, including but not limited to, applications, appeals, pleadings, or motions.”⁹ Without representation, these limited measures are simply not enough to ensure fairness.

2. Private bar

The private bar is likewise unable to meet the need for legal representation in these fast and complex cases. As an initial matter, most families arrive with few resources to hire a private attorney and cannot secure work authorization given the speed of proceedings. For those who are able to seek out assistance from private practitioners, many are met with rejections when an attorney learns the case is on the Dedicated Docket due to the speed and confusion that mark these proceedings. As one attorney in Los Angeles explained: “it is almost impossible to provide proper preparation” on the Docket due to the quick completion goal worsened by logistical issues with EOIR, such as “changing court calendars without notice.”

The ongoing COVID-19 pandemic exacerbates this problem. The CDC recommends that individuals who contract COVID-19 quarantine for five days.¹⁰ According to one private attorney in San Francisco, who was training to volunteer as an AOD, this policy impacts the number of cases that she can take on. If one of her administrative staff members has to quarantine, that is one less person in her office who can meet with a client or prepare filings.

3. Notario fraud

Without sufficient access to representation, notarios come in to fill the gap. Notario fraud has been identified as an issue in at least seven cities hosting a Docket: Boston, Denver, Los Angeles, Miami, San Diego, San Francisco, and Seattle. In San Diego, providers shared that notarios will charge a fee for each family member’s asylum application and “will not review [the] filed application with respondent.” In Miami, a legal service provider reported observing notarios “assisting” families in filing their asylum applications but submitting them at the “wrong location (court instead of USCIS or vice versa).” In San

⁷ See CILP, [The Biden Administration’s Dedicated Docket: Inside Los Angeles’ Accelerated Court Hearings for Families Seeking Asylum](#), May 2022, at 7-8.

⁸ See *supra* note 3, at 2.

⁹ See EOIR, [Friend of the Court, DM 2206](#), May 5, 2022.

¹⁰ See CDC, [CDC streamlines COVID-19 guidance to help the public better protect themselves and understand their risk](#), August 2022.

Francisco, where some agencies assist with the preparation and filing of skeletal I-589s, the demand for this service has outpaced their limited capacity. As a result, it is common for pro se respondents to seek the services of notarios, for fear of showing up to their next master calendar hearing without a completed Form I-589. Unfortunately, many local notarios have charged respondents hundreds of dollars to prepare applications, which usually do not include any details in the narrative portion of the form.

B. Expedited and Arbitrary Timelines

1. Scheduling of hearings

The expedited nature of the Docket, along with the strict deadlines imposed, cause a great deal of distress for respondents and make it nearly impossible for them to adequately prepare their cases for trial. Practitioners across the country have noted that judges often grant a limited number of continuances for master calendar hearings. In Denver, for example, one practitioner reported that respondents are “routinely required to respond to the allegations in the [Notice to Appear] at the 2nd hearing and continuances are rarely granted,” except where a Friend of Court indicates that the respondents have an upcoming consultation scheduled. In Seattle, judges “generally grant no more than two continuances to families seeking additional time to find an attorney.” Many immigration attorneys prefer to review a respondent’s credible fear interview notes and submit requests for additional records prior to advising a respondent on how to plead to the allegations in a Notice to Appear. At such an accelerated pace, the schedule of master hearings on the Dedicated Docket does not give enough time for counsel to adequately advise a respondent as to how to plead, let alone give pro se respondents the opportunity to find legal advice or understand how to plead on their own.

Depending on the jurisdiction, judges have denied additional continuances despite respondents showing good cause.¹¹ In New York, one practitioner reported having filed two continuances—one for a pending TPS application, and the other because the entire family had COVID. Both continuances were denied. In cases where judges have granted continuances, they are often very short—one to two months or even days. According to one practitioner in San Francisco, a respondent who had appeared for his master calendar hearing in August 2022 explained to the judge that he had paid \$1,000 in late June to an attorney who was supposed to have reviewed his I-589 application. Unfortunately, he never heard from the “attorney” again, and when he tried to reach them, the call went straight to voicemail. The judge presiding over the case showed no sympathy, giving him a continuance of only two days to submit his asylum application. The pressure of judges to adjudicate cases within 300 days has ultimately resulted in a miscarriage of justice, including when respondents have presented valid reasons to the court why they need more time to prepare.¹²

¹¹ An immigration judge may grant a motion for continuance for good cause shown. 8 C.F.R. § 1003.29.

¹² While the purported goal of these expedited timelines is to promote the efficient adjudication of cases, the results suggest otherwise. As of July 1, 2022, only 12,967 out of the 67,265 cases placed on the Dedicated Docket were completed: a completion rate of just 19%. This lack of efficiency, coupled with the lack of fairness described herein, makes plain that neither of the Administration’s stated goals for the Docket are being achieved.

2. Preparation and filing of asylum applications

The expedited nature of the Docket also pressures immigration judges to place unrealistic deadlines on pro se respondents to file asylum applications before they are able to secure legal representation. Practitioners in numerous cities, including Detroit, El Paso, Los Angeles, Miami, New York, Newark, and San Francisco, have confirmed that judges are continuing to set arbitrary deadlines by which respondents are expected to file their asylum applications. Some judges have requested that respondents submit their asylum applications as soon as their second master calendar hearing. This poses a severe challenge, particularly for pro se respondents, who are struggling to find local organizations that have capacity. In San Francisco, a pro se respondent spent eight hours using Google Translate to fill out his Form I-589. An attorney's review revealed the form was filled out incorrectly, and a Friend of the Court still had to assist the respondent. Given the lack of access to counsel, pro se respondents are often rushed into hastily filling out asylum applications on their own. Respondents may work with friends, relatives, or members of their community who may not understand the intricacies of the Form I-589 and applicable law, such as whether an asylum applicant should apply for relief under the Convention Against Torture or how to explain why they did not choose to seek asylum in other countries before coming to the United States. The placement of inaccurate details or poorly worded information can lead to confusion as to the legal theory of the case and can also give rise to credibility issues in the final merits hearing.

C. Removal Orders

1. In absentia

As of December 2021, 1,557 (99.3%) of the 1,687 cases on the Dedicated Docket that had been resolved resulted in removal orders.¹³ The majority of these removal orders were most likely issued in absentia; that is, families were ordered removed for failing to appear at their hearing. In Los Angeles, where more detailed data has been analyzed, 72.4% of families who were ordered removed as of February 2022 were ordered removed in absentia, including orders issued against children who have little to no autonomy over whether they appear in court.¹⁴ Providers in Denver, New York City, San Francisco, and Seattle have also raised concerns about children being ordered removed in absentia. The only recourse individuals have is filing a motion to reopen their case. But many individuals do not know that they can move to reopen their case, much less that they must file the motion within a narrow time period and meet the stringent standards for such motions.¹⁵ As a result, the vast majority of individuals who have been ordered removed on the Dedicated Docket, including children, have been removed without the opportunity to have their day in court.

In absentia removals are of particular concern because many noncitizens lack notice of their hearing. Because individuals on the Dedicated Docket have just arrived in the United States, many do not have a permanent address and accordingly do not receive their hearing notices. In addition, providers in Boston have reported that the court often reschedules hearings, causing confusion over when respondents are in fact expected to appear in court. Alarming, community organizations and news sources have reported a trend of DHS erroneously listing a non-profit organization's address on an individual's immigration

¹³ See *supra* note 5.

¹⁴ In fact, in Los Angeles, 48.4% of those removed in absentia are children, of whom two thirds are ages six and under. CILP, *supra* note 7, at 1-2.

¹⁵ See 8 C.F.R. § 1003.23; [Immigration Court Practice Manual](#), Rule 5.7.

documents even when the organization has no connection to the respondent.¹⁶ As a result, respondents in New York, Boston, and Miami, among other cities, are not receiving crucial communications about their removal proceedings, including hearing notices.

Moreover, families in several of the eleven Docket cities have been ordered removed in absentia while complying with mandatory Immigration and Customs Enforcement (ICE) supervision orders. The scheduled ICE appointments often conflict with immigration court hearings, compelling individuals to do the impossible: to be in two places at once. In addition, individuals face confusion about the difference between their mandatory ICE appointments and their EOIR hearings, sometimes resulting from misinformation by administration officials. These appointments often occur in the same building, and ICE gives individuals their EOIR hearing dates at their ICE check-in appointments. In one particular case in Los Angeles, a father and his son received a Notice to Appear with a court hearing date when they went to their ICE check-in and believed it to be the date of their next ICE check-in. When they arrived at the specified time, they were instructed to wait in the ICE check-in lobby and did so for seven hours. They were eventually informed that they were, in fact, supposed to appear at a hearing on a different floor of the building and that, because they failed to appear, they were removed in absentia.¹⁷ Families are doing all they can to comply with immigration procedures, but they face removal due to circumstances beyond their control.

Recognizing these concerns, and as a result of local advocacy, Office of the Principal Legal Advisor (OPLA) in Boston has agreed to seek continuances in cases where families did not appear for their hearings rather than pursue removal orders in absentia. However, not all other cities appear to have followed suit.

2. Failure to submit I-589

Families on the Dedicated Docket have been ordered removed for failing to submit Form I-589s in time to meet arbitrary deadlines set by immigration judges. The case completion goals imposed by the Dedicated Docket compel immigration judges to set quick deadlines and to order families removed for failing to meet those court-imposed deadlines. The decision to curtail individuals' time to submit their Form I-589 unnecessarily rushes applications for relief and poses a further obstacle to obtaining representation. In one San Francisco case, for example, an attorney declined to represent an individual because there was insufficient time to prepare the Form I-589 before the court-imposed deadline. The individual was ultimately ordered removed for failing to submit the Form I-589. Practitioners have reported families being removed for missing the court-imposed filing deadlines in four Dedicated Docket cities and have reported immigration judges threatening to remove families on this basis in seven of the eleven Dedicated Docket cities.

Moreover, individuals have been removed for failure to file a Form I-589 even where they have, in fact, complied with the court-imposed filing deadline. A practitioner in El Paso reported that their client received a removal order by mail on the grounds that they did not submit any application for relief within the deadline the court set, but the practitioner had in fact previously filed a Form I-589 for that client during a master hearing. In such cases, respondents must appeal the removal order to remedy the error; however, many may not be aware of the appeals process and may be forced to navigate their appeal without an attorney. The rushed nature of proceedings has thus led to miscarriages of justice even where asylum applications were properly filed: a sign that these fast-track procedures—coupled with the ongoing

¹⁶ See, e.g., John Lavenburg, [Catholic Charities NY Blames Immigration Officials for Listing its Address on Migration Docs](#), Crux, August 10, 2022.

¹⁷ See CILP, *supra* note 7, at 7.

challenges of the pandemic, backlogs, and staffing shortages—are straining EOIR’s ability to process cases fairly and competently.

D. Courtroom Atmosphere

While the threat of receiving a removal order weighs heavily on the minds of all respondents, practitioners and observers across the country have noted that the accelerated pace of the Dedicated Docket gives rise to an especially strict and unwelcoming environment. Because respondents on the Docket, by definition, are recently arrived families, it is all the more vital that judges demonstrate empathy and compassion towards the individuals present in their courtrooms. Unfortunately, practitioners and observers across the Dedicated Docket cities have found that this is not the case.

1. Hostile treatment

Practitioners in at least six of the eleven Dedicated Docket cities have reported hostile treatment on the part of the immigration judges. In Miami, for example, one practitioner reported that attorneys have “seen IJs get aggressive with Respondents who [did] not understand what the judge was saying.” In July 2022, an El Paso immigration judge ordered a family removed after they misunderstood the judge’s question—“Are you afraid of returning to your home country?” Due to lack of capacity, there were no staff members from the Immigration Court Help Desk, nor the Family Group Legal Orientation Program present at the hearing to assist the family, and they mistakenly answered, “No.”

In November 2021, an IJ on the Dedicated Docket in San Francisco reportedly moved a respondent to tears during a master hearing. Upon asking a respondent whether she was served with her NTA, the respondent answered that she had not. After confirming the lack of service a second time, the IJ berated her saying that she must have been served because she had signed the NTA. The respondent broke down crying. She spoke to an Attorney of the Day after the hearing and insisted she did remember signing a document, but that the official she spoke to never gave her that document. She also confirmed that the documents she had with her at the hearing were the only documents given to her at the border.

2. Special safeguards for children

Immigration court records indicate that from October 2021 thru February 2022, DHS issued nearly 9,000 NTAs to babies and toddlers between the ages of 0-4 on the Dedicated Docket.¹⁸ These children are part of a growing trend: recent data shows one-third of all new immigration court cases involve children.¹⁹ That is true for 100% of Dedicated Docket cases which, by definition, target families with children. The placement of children on any docket—and particularly accelerated dockets—demands special safeguards.

The swift adjudication of cases on the Dedicated Docket prejudices children in numerous ways. If a child qualifies for Special Immigrant Juvenile Status (SIJS), for example, given the backlogs, the adjudication of a SIJS case for a child from a Northern Central American country can take considerably longer than 300

¹⁸ See TRAC, [One-Third of New Immigration Court Cases Are Children: One in Eight are 0-4 Years of Age](#). Case by case immigration court records through February 2022 indicate that DHS issued 310,359 NTAs from October 2021 through February 2022. Where age is recorded, 81,080 or 31 percent of these immigrants were from 0 to 17 years of age at the time DHS issued the NTA. Out of the total 81,080 juvenile cases, 32,691 of them included children from 0 to 4 years of age. A little over a quarter of these young children (27% or 8,980 children in total) were part of a family assigned to the Dedicated Docket.

¹⁹ *Id.*

days.²⁰ A family should have adequate time to pursue all forms of relief available to each individual member of the family; sped up hearings do not account for such complexities.

Judges on the Dedicated Docket also need to be well-informed on how to provide an inclusive, non-threatening, and trauma-informed environment for children in the courtroom. Many, if not most, of the children have experienced a severe amount of trauma, alongside their parents, which led to their family fleeing their home country to seek refuge in the United States.²¹ According to the National Child Traumatic Stress Network, a child's traumatic reactions can include a variety of responses, "such as intense and ongoing emotional upset, depressive symptoms or anxiety, behavioral changes, difficulties with self-regulation, problems relating to others or forming attachments, regression or loss of previously acquired skills, attention and academic difficulties, nightmares, difficulty sleeping and eating, and physical symptoms, such as aches and pains."²² Although minor children are often excused from attending future hearings after appearing in court once, witnessing poor treatment of their parents in the courtroom could only exacerbate any trauma symptoms that they are currently experiencing. Not only can untreated trauma worsen over time, but it can also impede an individual's ability to pursue relief. Therefore, it is imperative for judges to create an environment where each respondent is treated with respect to prevent any further traumatization of children in the courtroom.

II. Recommendations

In light of these grave concerns, we strongly urge the administration to terminate the Dedicated Docket.

At base, the Docket has failed to achieve the administration's stated goals "to more expeditiously and fairly make decisions" for certain asylum seeking families.²³ Many cases have not been resolved within the 300-day period. Those that have reveal an alarming practice of removing families in absentia where they did not receive notice of their hearing or were complying with other immigration requirements. Moreover, many families on the Docket are unable to obtain representation because providers, including those on EOIR's pro bono lists, are already over-capacity and the Docket's unpredictable, expedited calendaring presents acute challenges. Families are thus left to navigate removal proceedings on their own. The administration can and should terminate the Dedicated Docket because it has failed to achieve its stated goals of efficiency and fairness.

In the event the administration does not terminate the Docket, we strongly urge the administration to take the following steps immediately:

- **Secure funding for government-appointed immigration counsel for asylum seekers on the Dedicated Docket:** Numerous studies have established that legal representation is crucial to families' ability to meaningfully apply for and be granted immigration relief. Yet, families on the dedicated docket are unable to obtain representation for the numerous reasons discussed *supra*. Although providers are committed to helping individuals seeking asylum, the capacity of pro bono and other legal service providers is greatly stretched. While LOP providers offer an important service, they do not provide legal representation. The government should provide funding for and appoint counsel to all families on the dedicated docket who seek representation.

²⁰ See American Bar Association Commission on Immigration, [Practice Advisory: Ethical Considerations for Representing Families on the Dedicated Docket](#), February 2022.

²¹ See UNHCR, [Children on the Run](#).

²² The National Child Traumatic Stress Network, [About Child Trauma](#).

²³ See *supra* note 1.

- **Expand the National Qualified Representative Program (“NQRP”) to non-detained individuals on the Dedicated Docket:** Under the NQRP, the federal government provides government-appointed immigration counsel to detained noncitizens who have been found not competent to represent themselves in their removal proceedings.²⁴ The administration should expand the NQRP so that it encompasses non-detained asylum seekers on the Dedicated Docket.
- **Stop issuing removal orders in absentia against families without first confirming their address and assessing whether they are complying with ICE supervision:** Many families on the Dedicated Docket have been ordered removed in absentia even though their failure to appear was through no fault of their own. Rampant notice problems, including immigration officials putting incorrect addresses on the NTA, have made it impossible for many families to know the date and time of their hearing. Moreover, families are often forced to decide between, or face confusion about, competing obligations to comply with ICE supervision and appear at their removal hearing—failure to do either of which can result in removal. Immigration judges should accordingly stop their practice of issuing in absentia removal orders without holding OPLA to its heavy burden under 8 U.S.C. 1229a(b)(5)(A) of proving notice and alienage by “clear, unequivocal, and convincing evidence.” That includes, but is not limited to, requiring OPLA to provide evidence of proper notice and information about whether a family is complying with ICE supervision (a fact that strongly weighs against issuance of an in absentia order) in every case.
- **Stop issuing removal orders in absentia against children:** Children placed on the Docket have no control over their ability to appear at a hearing, much less a well-informed understanding of the proceedings. Ordering children removed in absentia when they do not appear in court thus frustrates basic fairness norms. The agency should immediately halt this unfair practice.
- **Defer adjudication of cases for pro se families on the dedicated docket to allow them time to find counsel:** Many families on the Docket who have been unable to obtain representation have nonetheless been forced to prepare and submit asylum applications pro se and proceed with individual merits hearings without counsel. This is so even though families, who seek stability and desire to have their cases resolved, have diligently sought representation. If the administration does not provide government-appointed immigration counsel, it should use its authority under 8 C.F.R. 1003.0(b)(1)(ii) to defer adjudication of cases against families who have been unable to obtain representation to allow them time to find counsel.
- **Make information and data regarding the Dedicated Docket and its operation publicly available:** At present, information regarding the Docket can only be obtained through a Freedom of Information Act request, which is often a lengthy process.²⁵ Information regarding the demographics of families placed on the Dedicated Docket, calendaring of merits hearings, and case outcomes, among other data points, is critical to understanding how the Docket operates and ensuring just and fair proceedings. EOIR should increase transparency by making data regarding the Dedicated Docket publicly available.

²⁴ Vera Institute of Justice, [National Qualified Representative Program](#).

²⁵ Multiple FOIA requests were filed in July 2022 by the Stanford Law School Immigrants' Rights Clinic on behalf of the Justice & Diversity Center of the Bar Association of San Francisco. To date, no responsive records have been provided.

The undersigned organizations are committed to ensuring a fair and just administration of our immigration laws and supporting asylum seeking families in their quest to find safety. Rather than achieve these goals, the Dedicated Docket undermines fairness, prioritizing expediency with no other perceptible benefit, and ultimately results in families being ordered removed to the very dangers they fled with no opportunity to meaningfully present their claims. We request a meeting to discuss our concerns and the specific recommendations made in this letter, and we welcome the opportunity to engage with the administration in finding ways to explore the adoption of procedures that are actually sensitive to the needs of families. For any questions regarding the letter, please contact Blaine Bookey (bookeybl@uchastings.edu) or Monica Howell (mhowell@sfbar.org).

Adelanto Visitation & Advocacy Network
African Advocacy Network
African Human Rights Coalition
AILA NorCal
American Immigration Council
American Immigration Lawyers Association
Bay Area Asylum Mental Health Project/Research institute Without Walls
Border Network for Human Rights
Catholic Charities East Bay
Catholic Migration Services
Catholic Migration Services, New York
Center for Gender & Refugee Studies, UC Hastings Law
Center for Immigration Law and Policy, UCLA School of Law
Center for Safety & Change
Center for Victims of Torture
Central American Legal Assistance
Central American Refugee Center (CARECEN - NY)
Central American Resource Center (CARECEN - of California)
Central American Resource Center of Northern CA (CARECEN - SF)
Centro Cultural de las Americas, Inc.
Centro Legal de la Raza
Church World Service
Coalition for Humane Immigrant Rights (CHIRLA)
Coalition for Immigrant Mental Health
Colorado Asylum Center
Columbia Law School Immigrants' Rights Clinic
Communities United for Status and Protection (CUSP)
Community Legal Services in East Palo Alto
Disciples Refugee & Immigration Ministries
Doctors for Camp Closure
East Bay Refugee and Immigrant Forum
Education and Leadership Foundation
Esperanza Immigrant Rights Project
First Focus on Children
Florence Immigrant & Refugee Rights Project
Georgia Human Rights Clinic
Greater Boston Legal Services
Haitian Bridge Alliance

Haitian Legal Network, inc.
HaleyNelson & Heilbrun LLP
Harvard Immigration and Refugee Clinical Program
Human Agenda
Human Rights First
Immigrant & Refugee Services, Catholic Charities Community Services, Archdiocese of New York
Immigrant Defenders Law Center
Immigrant Legal Advocacy Project
Immigrant Legal Defense
Immigrant Legal Resource Center
Institute for Justice & Democracy in Haiti
Isa Law PA
Jewish Family & Community Services East Bay
Jubilee Immigration Advocates
Justice Action Center
Justice & Diversity Center of The Bar Association of San Francisco
La Raza Centro Legal
La Raza Community Resource Center
Latin Advocacy Network
Law Office Aliya Karmali
Law Office of Adriana Mitchell
Law Office of Helen Lawrence
Law Office of Jean Binkovitz, LLC
Law Office of Lina M. Alta
Law Office of Martinez, Nguyen and Magana
Law Offices of Sarah V. Perez
Lawyers' Committee for Civil Rights of the San Francisco Bay Area
Legal Services for Children
Los Angeles LGBT Center
Martinez Law Group, PC
Massachusetts Immigrant & Refugee Advocacy Coalition
Massachusetts Law Reform Institute
Morris Law Group, PC
Mount Sinai Human Rights Program
National Immigrant Justice Center
National Immigration Law Center
National Immigration Project of NLG
National Justice For Our Neighbors
National Latinx Psychological Association
National Lawyers Guild - Los Angeles Chapter
National Lawyers Guild - San Francisco/Bay Area Chapter
National Network for Immigrant and Refugee Rights
National Partnership for New Americans
New Mexico Immigrant Law Center
New York Immigration Coalition
New York Law School Asylum Clinic
New York Legal Assistance Group
Northwest Immigrant Rights Project

Oasis Legal Services
Pangea Legal Services
Public Counsel
Public Law Center
Rocky Mountain Immigrant Advocacy Network
Safe Passage Project
San Francisco Immigrant Legal Defense Collaborative
Tahirih Justice Center
The Advocates for Human Rights
The Legal Aid Society (New York)
The Legal Project
The Right to Immigration Institute
TRII/ Dignidad
UCLA Immigrant Family Legal Clinic
UCSF Health and Human Rights Initiative
University of La Verne
University of San Francisco Immigration & Deportation Defense Clinic
UnLocal
Witness at the Border
Young Center for Immigrant Children's Rights