

UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
IMMIGRATION COURT - TACOMA, WASHINGTON

In the Matter of:

WILLIAM GARY WHATCOTT,
Respondent,

File No: A-76739183
In Removal Proceedings.

MOTION FOR ATTORNEY TO APPEAR REMOTELY VIA WEBEX / TELEPHONE

Hearing Date: Monday, October 19, 2026

TO THE HONORABLE IMMIGRATION COURT:

Comes now Respondent, WILLIAM GARY WHATCOTT, by and through undersigned counsel of record, JAMES BLAISE, and respectfully moves this Honorable Court for an Order permitting counsel to appear remotely via EOIR Webex, or alternatively telephonically, for the hearing scheduled Monday, October 19, 2026.

I. GOOD CAUSE

1. Respondent is detained at the Northwest ICE Processing Center (NWIPC), 1623 E J Street, Tacoma, WA 98421.
2. Undersigned counsel of record is JAMES BLAISE, based in Oklahoma, counsel of record for Respondent in this matter.
3. Counsel is more than 1,500 miles from the Tacoma Immigration Court and is unable to arrange in-person appearance before the October 19, 2026 setting without undue burden.
4. Denial of remote appearance will leave Respondent, who remains detained, unrepresented at a critical hearing. Respondent faces a pending extradition request from Canada, making continuity of counsel essential.
5. Counsel is admitted to practice before the Executive Office for Immigration Review.

II. LEGAL AUTHORITY

This Motion is filed pursuant to INA Section 240(b)(2)(B); 8 CFR Section 1003.25(c); 8 CFR Section 1003.27; and EOIR Policy Manual, Chapter 4.8(c) - Internet-Based Hearings.

III. RESPONDENT CONSENT AND NO PREJUDICE

6. Respondent has been advised of his right to have counsel appear in person and consents to counsel appearing remotely via Webex/telephone. Respondent waives any objection to remote appearance of his own counsel.
7. DHS will suffer no prejudice. The Court will retain full ability to see, hear, and question counsel.

IV. RELIEF REQUESTED

WHEREFORE, Respondent respectfully requests this Court:

- a. GRANT this Motion and permit JAMES BLAISE to appear remotely via EOIR Webex for the October 19, 2026 hearing; or alternatively
- b. Permit counsel to appear telephonically; or in the alternative,
- c. Continue the matter for a brief period to permit in-person appearance, maintaining current counsel of record.

Respectfully submitted,

JAMES BLAISE, Esq.
Counsel of Record for Respondent
Oklahoma
Email: [ADD EMAIL] Phone: [ADD PHONE]
EOIR ID No.: [ADD EOIR ID] Bar No.: [ADD STATE BAR]

CERTIFICATE OF SERVICE

I, JAMES BLAISE, hereby certify that on this day, a true and correct copy of the foregoing Motion was served via email upon:

Office of the Principal Legal Advisor (OPLA)
ICE - Tacoma
OPLA-Tacoma-Intake@ice.dhs.gov

And filed via EOIR ECAS.

JAMES BLAISE
Date: October 13, 2026