

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

M.S.M.,

Petitioner

v.

Yolanda PITTMAN,
in her official capacity as Warden
of the Elizabeth Contract
Detention Facility;

John TSOUKARIS,
in his official capacity as
Newark Field Office Director,
Enforcement and Removal Operations
for U.S. Immigration and Customs
Enforcement;

Kristi NOEM,
in her official capacity as
Secretary of the U.S. Department
of Homeland Security;

Pamela BONDI,
in her official capacity as
Attorney General of the United
States,

Respondents.

Case No. _____

**PETITIONER'S NOTICE OF
MOTION FOR LEAVE TO
PROCEED UNDER
PSEUDONYM AND TO FILE
UNDER SEAL**

TO: Yolanda Pittman
John Tsoukaris
Kristi Noem
Pamela Bondi

PLEASE TAKE NOTICE that on May 7, 2025 Petitioner M.S.M.,
by and through his counsel, Perkins Coie LLP, will move before
the United States District Court for the District of New Jersey,
Martin Luther King Building & U.S. Courthouse, 50 Walnut Street,

Newark, NJ 07101, for the entry of an Order granting his motion for leave to proceed under pseudonym and to file a Petition for Writ of Habeas Corpus (the "Petition"), Exhibits A-DD to the Petition, Motion for Preliminary Injunction With Temporary Restraining Order Via Order to Show Cause, Memorandum of Law in Support of Order to Show Cause for Preliminary Injunction With Temporary Restraining Order, and the memorandum of law in support of this motion for leave to proceed in this action pseudonymously, under seal.

PLEASE TAKE FURTHER NOTICE that in support of Petitioner's motion, Petitioner will rely on the concurrently-filed memorandum of law, together with all exhibits and papers cited therein and papers currently on file with the Court and any and all submissions and arguments that Petitioner makes hereafter.

Dated: May 7, 2025

Respectfully submitted,

By: /s/ Adam R. Mandelsberg

Adam Mandelsberg, NJ Bar # 065532013

Thomas V. Matthew (pro hac vice forthcoming)

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