

ALINA HABBA
Acting United States Attorney
ALEX SILAGI
Assistant U.S. Attorneys
970 Broad Street
Newark, NJ 07102
Attorneys for Respondents

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

EVGENY MASHCHENKO, *et al.*,

Petitioner,

v.

KRISTI NOEM, *et al.*,

Respondents.

HON. ROBERT KIRSCH, U.S.D.J.

Civil Action No. 25-12387-RK

NOTICE OF MOTION TO SEAL

To: Evgeny Mashchenko
Elizabeth Contract Detention Center
625 Evans Street
Elizabeth, NJ 07201

Evgeniia Mashchenko
Delaney Hall Detention Facility
451 Doremus Ave
Newark, NJ 07105
Pro se Petitioners

PLEASE TAKE NOTICE, that on **September 15, 2025**, or as soon thereafter as counsel may be heard, Respondents Eric Rokosky, John Tsoukaris, Kristi Noem, and Pamela Bondi will apply to this court, pursuant to Local Civil Rule 5.3(c), for an order sealing Exhibits A to G submitted in support of Respondents' Answer to Petition for Writ of Habeas Corpus, ECF No. 13.

In support of this motion, Respondents respectfully refer the Court to the accompanying Declaration of Alex Silagi and ask that the Court decide this motion on the papers submitted, without oral argument, pursuant to Rule 78 of the Federal Rules of Civil Procedure.

Respectfully submitted,

TODD W. BLANCHE
U.S. Deputy Attorney General

ALINA HABBA
Acting United States Attorney
Special Attorney

By:

s/Alex Silagi
ALEX SILAGI
Assistant United States Attorney

Dated: August 19, 2025