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UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

YANDDIRY YANETH CONTRERAS
MALDONADO,

Petitioner,

v.

ALEXANDER CABEZAS, *et al.*,

Respondents.

HON. JAMEL K. SEMPER, U.S.D.J.

Civil Action No. 25-13004 (JKS)

NOTICE OF MOTION TO SEAL

To: Jacqueline Pearce, Esq.
Katherine St. Romain, Esq.
Fried Frank Harris Shriver & Jacobson LLP
One New York Plaza
New York, NY 10004
Attorneys for Petitioner

PLEASE TAKE NOTICE, that on **September 15, 2025**, or as soon thereafter as counsel may be heard, Respondents Alexander Cabezas, Kristi Noem, and Pamela Bondi will apply to this court, pursuant to Local Civil Rule 5.3(c), for an order sealing certain records and information submitted in support of Respondents' Answer to Petition for Writ of Habeas Corpus, ECF No. 10.

In support of this motion, Respondents respectfully refer the Court to the accompanying Declaration of Andrew Boccio 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/Andrew Boccio
ANDREW BOCCIO
Assistant United States Attorney

Dated: August 13, 2025