

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

JUAN A. VILLATORO

Petitioner,

v.

YOLANDA PITTMAN, et al.,

Respondents.

CASE NO: 2:25-CV-13472-MCA

The. Hon. Madeline Cox Arleo

**NOTICE OF MOTION TO SEAL
DOCUMENTS**

NOTICE OF MOTION TO SEAL DOCUMENTS

PLEASE TAKE NOTICE that pursuant to Local Civil Rule 5.3(c)(1), Petitioner, Mr. Juan A. Villatoro, by and through undersigned counsel, hereby moves this Court for entry of an Order permitting the filing under seal of Exhibits D, E, K, L, and M to Plaintiff's Exhibit List in support of his Memorandum of Law, filed before this Court on August 1, 2025. Exhibits D and E contain Petitioner's immigration applications, which include his social security number and family members' information as well as his fear-based claim. Exhibits K, L, and M contain confidential medical records. This motion is unopposed by the Government.

In support of this Motion, Petitioner submits the attached Certification of Counsel, Index in compliance with Appendix U, and a Proposed Order.

Respectfully submitted,

/s/ Anne Kassalow

Anne Kassalow, Esq.

Dr. Glykeria Teji, Esq. (*pro hac vice pending*)

SETON HALL LAW SCHOOL, CENTER FOR SOCIAL JUSTICE

833 McCarter Highway

Newark, NJ 07102

Tel: (973) 642-8700

Anne.kassalow@shu.edu

Counsel for the Petitioner

Dated: August 6, 2025

CERTIFICATE OF SERVICE

I certify that on August 6, 2025, I electronically filed the attached Notice of Motion and accompanying documents with the Clerk of the Court for the United States District Court of New Jersey using the CM/ECF system. Service will therefore be effected by the CM/ECF system.

Respectfully submitted,

/s/ Anne M. Kassalow
Anne M. Kassalow, Esq.
SETON HALL LAW SCHOOL
CENTER FOR SOCIAL JUSTICE
833 McCarter Highway
Newark, NJ 07102
Tel: (973) 642-8700
Anne.kassalow@shu.edu

Counsel for Petitioner

Dated: August 6, 2025

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

JUAN A. VILLATORO

Petitioner,

v.

YOLANDA PITTMAN, et al.,

Respondents.

CASE NO: 2:25-CV-13472-MCA

Hon. Madeline Cox Arleo

ATTORNEY CERTIFICATION

CERTIFICATION OF DR. GLYKERIA TEJI, ESQ.

I, Dr. Glykeria Teji, Esq., hereby certify as follows:

1. I am counsel for the Petitioner in the above-captioned matter (a motion for my admission *pro hac vice* was filed in this matter and currently pending before this Court) and I make this certification in support of Petitioner's Motion to Seal Exhibits D, E, K, L, and M to Petitioner's Exhibit List.
2. Exhibit D contains Petitioner's application for Cancellation of Removal, which includes personally identifying information, including Petitioner's social security number. The Form EOIR-42A contains sensitive, highly personal information about the Petitioner's family relationships, household composition, relative's immigration statuses, and hardship details affecting his U.S. citizen children.
3. Exhibit E contains Petitioner's application for asylum, withholding of removal, and protection under the Convention Against Torture. Petitioner's fear-based claim is referenced in detail, and it includes information about his lived experience in El Salvador, as well as biographical and personally identifying information of his family members. The asylum application includes narratives of past persecution, trauma, threats to safety, and

fear of future harm, including possible torture, if Petitioner were returned to his country of origin. Public disclosure of this document would endanger Petitioner or his family members; reveal identifying details that could be exploited by individuals or entities Petitioner fears; risk re-traumatizing the Petitioner, who disclosed sensitive experiences under the expectation of confidentiality, and violate the long-standing practice of maintaining confidentiality in asylum proceedings, as recognized by federal law and regulation. *See, e.g.*, 8 C.F.R. §208.6.

4. Both applications contain personal, familial, and potentially life-endangering information that, if publicly disclosed, would cause clearly defined and serious injury to the Petitioner and his family. The sealing of these records is narrowly tailored, and no less restrictive alternative exists to protect the sensitive information contained therein.
5. Exhibits K, L, and M consist of or contain Plaintiff's medical records, which were provided in the course of litigation and are protected under federal and state privacy laws, including HIPAA. They also include graphic photographs of his foot wound and infection. Disclosure of these medical records in the public docket would invade Plaintiff's privacy and may cause emotional and reputational harm.
6. No less restrictive alternative is available that would protect Plaintiff's privacy interests while maintaining the utility of the records in litigation. Redaction is not feasible as the entirety of the exhibits contain sensitive health information.
7. The Government does not oppose the instant motion.
8. This request is made in good faith and in accordance with L. Civ. R. 5.3(c) and Appendix U.

I certify under penalty of perjury that the foregoing is true and correct.



Dr. Glykeria Teji, Esq.
Associate Clinical Professor
Center for Social Justice
Seton Hall University School of Law
833 McCarter Highway
Newark, NJ 07102
Tel: (973) 642-8796
Email: glykeria.teji@shu.edu

Dated: August 5, 2025

APPENDIX U – FORM OF INDEX

Material	Basis for Sealing	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why No Less Restrictive Alternative to the Relief Sought is Not Available	Party in Opposition to Sealing, if any, and Bias
Exhibit D, ECF No. 19789323-5, Petitioner's Cancellation of Removal Application	Certification of Dr. Glykeria Teji, Esq., ¶¶ 2, 4	Disclosure of this document in the public docket could cause emotional harm to Petitioner and his family, deter others from seeking lawful relief for fear of public exposure, and chill the open disclosure of relevant facts in future filings — which runs counter to the purpose of EOIR forms being filed confidentially in immigration proceedings.	Redaction is not feasible; the application includes extensive sensitive information regarding the Petitioner's family members, immigration history, financial circumstances, and hardship factors, all of which are interwoven throughout the form. These disclosures are necessary for adjudication but inappropriate for public dissemination.	None
Exhibit E, ECF No. 19789323-6, Petitioner's Application for asylum, withholding of removal, and protection under the Convention Against Torture	Certification of Dr. Glykeria Teji, Esq., ¶¶ 3–4	This application contains highly sensitive information regarding Petitioner's experiences of past persecution and fear of future harm, including potential torture, if returned to his country of origin. Public disclosure would risk Petitioner's safety, expose identifying details of harm-doers, and reveal personal trauma. Asylum filings are routinely kept confidential under federal regulations (8 C.F.R.	Redaction is not feasible; the application contains highly sensitive details about past persecution, personal trauma, and fear of future harm, the disclosure of which could jeopardize the safety of Petitioner and his family. The sensitive narrative is inseparable from the legal and factual assertions required for adjudication.	None

		§ 208.6), and unsealing would undermine that protection. Sealing is necessary to prevent serious harm and maintain the integrity of these humanitarian proceedings.		
Exhibit K, ECF No. 19789323-12, Petitioner's Medical Record summary from Moshannon Valley Processing Center and photos of infected foot.	Certification of Dr. Glykeria Teji, Esq., ¶ 5.	Disclosure of sensitive health data would violate privacy and cause reputational/emotional harm.	Redaction is not feasible; the entire document consists of confidential medical information protected under federal and state privacy laws. Sealing is the only way to prevent the disclosure of Petitioner's sensitive health conditions, diagnoses, and treatment history, which are irrelevant to the public but essential to the Court's review.	None
Exhibit L, ECF No. 19789323-13, Letter by Petitioner's medical professional regarding Petitioner's foot infection.	Certification of Dr. Glykeria Teji, Esq., ¶ 5.	Disclosure of sensitive health data would violate privacy and cause reputational/emotional harm.	Redaction is not feasible; the entire document consists of confidential medical information protected under federal and state privacy laws. Sealing is the only way to prevent the disclosure of Petitioner's sensitive health conditions, diagnoses, and treatment history, which are irrelevant to the public but essential to the Court's review.	None
Exhibit M, ECF No. 19789323-14, Petitioner's Medical Records from St. Michael's Medical	Certification of Dr. Glykeria Teji, Esq., ¶ 5.	Disclosure of sensitive health data would violate privacy and cause reputational/emotional	Redaction is not feasible; the entire document consists of confidential medical information protected	None

Center and photos of infected foot.		harm.	under federal and state privacy laws. Sealing is the only way to prevent the disclosure of Petitioner's sensitive health conditions, diagnoses, and treatment history, which are irrelevant to the public but essential to the Court's review.	
-------------------------------------	--	-------	--	--

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

JUAN A. VILLATORO

Petitioner,

v.

YOLANDA PITTMAN, et al.,

Respondents.

CASE NO: 2:25-CV-13472-MCA

Hon. Madeline Cox Arleo

ORDER

ORDER GRANTING UNOPPOSED MOTION TO SEAL EXHIBITS D, E, K, L, AND M

THIS MATTER having come before the Court on Petitioner's Motion to Seal pursuant to Local Civil Rule 5.3(c), and the Court having considered the submissions of the parties and for good cause shown,

IT IS on this ____ day of _____, 2025, ORDERED that:

1. Petitioner's Motion to Seal is GRANTED;
2. Exhibits D, E, K, L, and M to Petitioner's Exhibit List shall be filed and maintained under seal until further order of this Court;
3. The Clerk is directed to restrict public access to these exhibits.

SO ORDERED.

Hon. The. Hon. Cox Arleo, Madeline
United States District Judge