

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION

IDRIS A.-R.,
Petitioner,

v.

KRISTI NOEM, *et al.*,
Respondents.

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CIVIL ACTION NO. 1:25-CV-167

RESPONDENT'S MOTION TO UNSEAL
DOCKET ENTRIES 1, 10 and 12 FOR A LIMITED PURPOSE

COMES NOW the United States of America through Nicholas J. Ganjei, United States Attorney in and for the Southern District of Texas, by and through the undersigned Assistant United States Attorney, counsel for Respondents, and respectfully requests this Honorable Court to unseal Docket Entry numbers 1, 10 and 12 for the limited purpose of responding to this litigation. This limited request will allow the file to remain sealed from general public view since the document is currently under seal by order of the Court. This request is made for the following reasons:

Petitioner filed his Writ of Habeas Corpus on July 31, 2025, alleging a civil suit brought pursuant to Title 28 U.S.C. § 2241. Docket Entry ("DE") 1. The Honorable U.S. Magistrate Judge Karen Betancourt entered an Order for Service of Process to serve the United States with copies of the Petition for Writ of Habeas Corpus on August 8, 2025, DE 3.

A review of the docket by Respondent revealed that DE 1 Petition for Writ of Habeas Corpus was entered in 07/31/2025. DE 10 is described as the sealed response to Petitioner's Writ of Habeas Corpus and Motion for Summary Judgment along with exhibits 1 and 2. DE 12 is

described as the sealed reply along with exhibit 1. Docket Entry numbers 1, 10 and 12 relate to the Petition for Writ of Habeas Corpus filed by Idris A-R. are sealed by the Court.

Respondents are not in possession of file-stamped copies of DE 1, 10 and 12 and believe that accessing the sealed, file-stamped pleadings will allow for documents to be correctly identified and referenced in pleadings and argument to the Court.

Respondents believe that access will be necessary to know and understand Petitioner's allegations to properly respond. Respondents further believe that it will be necessary to share the contents of DE 1, 10 and 12 with agency counsel for the Department of Homeland Security and relevant witnesses who may be the subject of DE 1, 10 and 12 or who may have direct or expert knowledge related to the allegations or contents to whom/which DE 1, 10 and 12 pertain.

Respondents pray this Honorable Court grant Respondents' foregoing motion and order that DE 1, 10 and 12 be unsealed as to Respondents for the limited purposes stated above.

Respectfully submitted,

NICHOLAS J. GANJEI
United States Attorney

/s/ Lance Duke

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been emailed to Counsel for Petitioner, Iris G. Bravo, at the email address indicated in the Petition for Writ of Habeas.

Iris G. Bravo
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Attorney for Petitioner

/s/ Lance Duke
Lance Duke
Attorney for Respondent

CERTIFICATE OF CONSULTATION

I certify that on October 9, 2025, Counsel for Respondents, Lance Duke, attempted to communicate with Counsel for Petitioner, Iris G. Bravo, through telephonic and electronic communication regarding the filing and granting of Respondents' Motion to Unseal Docket Entries 1, 10 and 12 for a Limited Purpose. Counsel for Petitioner advised that she is UNOPPOSED to the motion.

/s/ Lance Duke
LANCE DUKE