IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

K-S-

Petitioner,

v.

E.L. TATUM, JR., Warden of the Federal Correctional Institute, Berlin; **PATRICIA H. HYDE**, Acting Field Office Director of the Immigration and Customs Enforcement, Enforcement and Removal Operations, Boston Field Office; **TODD LYONS**, Acting Director, U.S. Immigration and Customs Enforcement; **KRISTI NOEM**, Secretary of U.S. Department of Homeland Security; **PAMELA BONDI**, U.S. Attorney General;

Respondents.

Case Number: 1:25-cv-288-SE-AJ

PETITIONER'S MOTION TO EXTEND LEVEL 1 SEAL OF UNREDACTED EXHIBITS ATTACHED TO THE HABEAS CORPUS PETITION

Pursuant to this Court's August 4, 2025 Order and Local Rule 83.12(d), Petitioner K-S-, by and through his counsel, respectfully moves this Court to extend the Level 1 seal on the original, unredacted exhibits attached to Petitioner's August 3, 2025 habeas corpus petition. Petitioner already filed the unredacted Exhibits 1-7 on ECF at the time of his habeas corpus filing. *See* Docket Number (DN) 1-1 – 1-7. Petitioner also filed the redacted Exhibits 1-7 on ECF on August 6, 2025. *See* DN 6-1 – 6-7.

As required by Local Rule 83.12(d), Petitioner is conventionally filing "an unredacted copy of the document highlighting in a translucent color the portion(s) of the document sought to be sealed."

Petitioner respectfully requests that this Court extend the Level 1 seal on the original,

unredacted exhibits attached to Petitioner's August 3, 2025 habeas corpus petition.

Respectfully submitted this 6th day of August 2025.

K-S-,

By and through his Counsel,

/s/ SangYeob Kim
Gilles R. Bissonnette (NH Bar: 265393)
SangYeob Kim (NH Bar: 266657)
Chelsea Eddy (NH Bar: 276248)
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing is served to all parties via email.

/s/ SangYeob Kim
SangYeob Kim (NH Bar: 266657)