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10
11 **IN THE UNITED STATES DISTRICT COURT**
12 **FOR THE DISTRICT OF ARIZONA**

13 Salim Masamba Malemba,

14 Petitioner,

15 v.

16 Pam Bondi, *et al.*,

17 Respondents.
18

No. CV-25-03641-PHX-SPL (ESW)

**JOINT MOTION FOR PRIVACY
ACT AND PROTECTIVE ORDER**

19 The Parties, through counsel, hereby stipulate and jointly move for a Privacy Act
20 Order and Protective Order to permit the release of government information, which
21 contains material protected from disclosure under the Privacy Act, 5 U.S.C. § 552a,
22 pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, to govern the disclosure,
23 use, and handling by the parties of confidential information in this action (the "Proposed
24 Protective Order"). As fully set forth in the Proposed Protective Order, disclosure and
25 discovery in this action will likely involve the production of confidential, personal and
26 private information pertaining to plaintiffs and witnesses including, but not limited to,
27 personally identifiable information, health information, immigration-related information
28 and other information protected by the Privacy Act of 1974, 5 U.S.C. § 552a. Disclosure

1 and discovery in this action will also likely involve confidential information about
2 Respondent's law enforcement or national security staffing, resources and/or methods—
3 the release of which to the public may adversely impact identifiable law enforcement or
4 national security interests—as well other information in Respondent's possession that is
5 protected or restricted from disclosure by a number of statutes and regulations. This also
6 includes information pertaining to applications for asylum or withholding of removal,
7 which are subject to disclosure conditions under 8 C.F.R. §§ 1003.27(c) and 1208.6(a), as
8 well as information pertaining to information pertaining to applications for asylum or
9 withholding of removal, which are subject to disclosure conditions under 8 C.F.R. §§
10 1003.27(c) and 1208.6(a). The parties therefore agree that good cause exists for such
11 information to be protected from unnecessary disclosure.

12 The parties therefore respectfully request that the Court issue the parties' Proposed
13 Protective Order accompanying this motion.

14 RESPECTFULLY SUBMITTED on November 25, 2025.

15 TIMOTHY COURCHAIINE
16 United States Attorney
17 District of Arizona

18 *s/Brooks Chupp*
19 BROOKS CHUPP
20 Assistant United States Attorney
Attorneys for Respondents

21 JON M. SANDS
22 Federal Public Defender

23 *s/Keith J. Hilzendege (with permission)*
24 KEITH J. HILZENDEGER
25 Assistant Federal Public Defender
26 *Attorney for Petitioner*
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CERTIFICATE OF SERVICE

I hereby certify that on November 25, 2025, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing.

s/M. Beickert
United States Attorney's Office