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8 UNITED STATES DISTRICT COURT
9 SOUTHERN DISTRICT OF CALIFORNIA

10 D.A.M,
11
12 Petitioner,

Civil Case No.: 25-CV-2657 JLS
(VET)

13 v.

14 KRISTI NOEM, Secretary of the
15 Department of Homeland Security,
16 PAMELA JO BONDI, Attorney
17 General, TODD M. LYONS, Acting
18 Director, Immigration and Customs
19 Enforcement, JESUS ROCHA,
20 Acting Field Office Director, San
Luis Detention Center²

**Motion to file
documents under seal and
Motion to proceed using
Petitioner's Initials rather
than full name**

21 Respondents.
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25 ¹ Federal Defenders of San Diego, Inc., is filing the habeas petition related to this
26 motion with provisional appointment under Chief Judge Order No. 134. Petitioner's
27 financial eligibility for representation is included in a sworn statement attached to
28 the habeas petition.

1 Petitioner requests the lodged documents and previously publicly filed
2 documents ECF 1-21 be filed under seal for the reasons explained in the lodged
3 documents. Petitioner further request that the case proceed using Petitioner's
4 initials rather than full name.

5 For the reasons explained therein, sealing the documents under seal is the
6 most narrowly tailored means to serve a compelling interest. Information
7 pertaining to applications for deferral of removal are extremely private and
8 regularly filed under seal. *See, e.g., Doe v. Becerra*, No. 25-cv-00647-DJC-DMC,
9 787 F.Supp.3d 1083, 1096 (E.D. Cal. Mar. 3, 2025); *see also* 8 C.F.R. § 208.6
10 (mandating that such information not be disclosed).
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12 Furthermore, using Petitioner's initials D.A.M. rather than
13 Petitioner's full name is appropriate as explained in the lodged
14 documents. *See, e.g., Doe v. Becerra*, 732 F. Supp. 3d 1071, 1091 (N.D.
15 Cal. 2024); *E.O.P. v. Andrews*, No. 1:25-cv-00721-SKO (HC), 2025 WL
16 1735396, at *1 (E.D. Cal. June 23, 2025).

17
18 Respectfully submitted,

19 Dated: December 31, 2025

s/ Zandra L. Lopez

20 Federal Defenders of San Diego, Inc.
21 Attorneys for Petitioner
22 Email: Zandra_Lopez@fd.org
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PROOF OF SERVICE

I, the undersigned, will cause the attached under seal motion to be emailed to the U.S. Attorney’s Office for the Southern District of California at USACAS.Habeas2241@usdoj.gov, as well as to Assistant United States Attorney Janet Cabral, Chief of the Civil Division.

Dated: December 31, 2025 s/ Zandra L. Lopez
Zandra L. Lopez

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