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11 *Attorneys for the Federal Respondents*

12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA**

14 Victor Kalid JACOBO RAMIREZ; Edgar
15 Michel GUEVARA ALCANTAR,

16 Petitioners,

17 v.

18 Kristi NOEM, Secretary, U.S. Department
 of Homeland Security; Pamela J. BONDI,
 19 Attorney General of the United States; U.S.
 DEPARTMENT OF HOMELAND
 SECURITY; Todd LYONS, Acting Director
 20 for U.S. Immigration and Customs
 Enforcement; U.S. IMMIGRATION AND
 21 CUSTOMS ENFORCEMENT; Jason
 KNIGHT, Acting Field Office Director,
 22 Executive Office for Immigration Review;
 Sirce OWEN, Acting Director, Executive
 23 Office for Immigration Review; LAS
 VEGAS IMMIGRATION COURT; John
 24 MATTOS, Warden, Nevada Southern
 Detention Facility; EXECUTIVE OFFICE
 25 FOR IMMIGRATION REVIEW,

26 Respondents.
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Case No. 2:25-cv-02136-RFB-MDC

**Federal Respondents' Motion for
Protective Order**

1 Pursuant to the Court's Order dated November 13, 2025 (ECF No. 23), Federal
2 Respondents respectfully move for entry of a protective order under Federal Rule of Civil
3 Procedure 26(c). Good cause exists for such relief, as certain materials relevant to this
4 action may contain sensitive, confidential, privileged, and/or personal information
5 requiring appropriate safeguards.

6 A proposed protective order setting forth the terms governing the production,
7 disclosure, and use of such information by any party or individual participating in this
8 litigation is attached hereto as Exhibit A.

9 Respectfully submitted this 17th day of November, 2025.

10 TODD BLANCHE
11 Deputy Attorney General of the United
12 States

13 SIGAL CHATTAH
14 First Assistant United States Attorney

15 /s/ Summer A. Johnson
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