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11  
 12 UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA

13 Harshdeep Singh Multani,  
 14  
 Petitioner,  
 15  
 v.  
 16 Pamela Bondi, *et al.*,  
 17  
 Respondents.  
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Case No. 2:25-cv-02284-CDS-EJY  
**Motion for leave to file exhibit  
 under seal**

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1 **POINTS AND AUTHORITIES**

2 Petitioner requests leave to file the following documents under seal:

3 8.	5/22/2025	Mental Health Records 4 <b>FILED UNDER SEAL</b>
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6 While courts prefer the public retain access to judicial filings and documents,  
7 *see Nixon v. Warner Commc'ns Inc.*, 435 U.S. 589, 597 (1978), a party may request  
8 sealing of a judicial record by demonstrating “compelling reasons” to prevent public  
9 access, *see Kamakana v. City and Cnty. of Honolulu*, 447 F.3d 1172, 1178 (9th Cir.  
10 2006). Protecting the privacy of confidential medical records constitutes a compelling  
11 reason. *Cf. Kamakana*, 447 F.3d at 1187 (affirming decision to unseal all records  
12 except medical records). Multani has “compelling reasons” to request that the above  
13 records be filed under seal. Exhibit 8 comprises Multani’s confidential mental health  
14 records. Disclosure would violate the petitioner’s privacy rights.

15 For these reasons, Multani respectfully requests the Court grant permission  
16 to file Exhibit 8 under seal.

17 **CONCLUSION**

18 For the foregoing reasons, Mr. Multani respectfully requests that this Court  
19 grant leave to file Exhibit 8 under seal.

20 Dated January 6, 2026

21 Respectfully submitted,

22 Rene L. Valladares  
23 Federal Public Defender

24 /s/Celeste Bacchi

25 Celeste Bacchi  
26 Assistant Federal Public Defender