

1 TIMOTHY COURCHAINÉ
2 United States Attorney
3 District of Arizona
4 BROOKS CHUPP
5 Assistant United States Attorney
6 Arizona State Bar No. 040231
7 Two Renaissance Square
8 40 North Central Avenue, Suite 1800
9 Phoenix, Arizona 85004-4449
10 Telephone: (602) 514-7500
11 Fax: (602) 514-7760
12 Email: brooks.chupp@usdoj.gov
13 *Attorneys for Respondents*

14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

Tanh Van Tran,

Petitioner,

v.

David R. Rivas, *et al.*,

Respondents.

No. 2:25-cv-4329-PHX-MTL (CDB)

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

The Parties, through counsel, hereby stipulate and jointly move for a Privacy Act Order and Protective Order to permit the release of government information, which contains material protected from disclosure under the Privacy Act, 5 U.S.C. § 552a, pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, to govern the disclosure, use, and handling by the parties of confidential information in this action (the "Proposed Protective Order"). As fully set forth in the Proposed Protective Order, disclosure and discovery in this action will likely involve the production of confidential, personal and private information pertaining to plaintiffs and witnesses including, but not limited to, personally identifiable information, health information, immigration-related information 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 December 19, 2025.

15 TIMOTHY COURCHAINE
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. Hilzendeger (with permission)*
24 KEITH J. HILZENDEGER
25 Assistant Federal Public Defender
26 *Attorney for Petitioner*
27
28