

1 **Jessie Agatstein**
2 Cal. Bar No. 319817
3 **Federal Defenders of San Diego, Inc.**
4 225 Broadway, Suite 900
5 San Diego, California 92101-5030
6 Telephone: (619) 234-8467
7 Facsimile: (619) 687-2666
8 jessie_agatstein@fd.org
9 Attorneys for Mr. Drammeh¹

10 **UNITED STATES DISTRICT COURT**
11 **SOUTHERN DISTRICT OF CALIFORNIA**

12 **MUHAMADOU DRAMMEH,**
13 **Petitioner,**

No.: 25-cv-3412-JLS-JLB

14 **v.**

Motion to file
documents under seal

15 **KRISTI NOEM, Secretary of the**
16 **Department of Homeland Security,**
17 **PAMELA JO BONDI, Attorney General,**
18 **TODD M. LYONS, Acting Director,**
19 **Immigration and Customs Enforcement,**
20 **JESUS ROCHA, Acting Field Office**
21 **Director, San Diego Field Office,**
22 **CHRISTOPHER LAROSE, Warden at**
23 **Otay Mesa Detention Center,**
24 **Respondents.**

25 Muhamadou Drammeh requests the lodged unredacted document be filed
26 under seal. He also requests this Court seal certain material originally filed
27 publicly *pro se*, specifically, all exhibits attached to his original *pro se* habeas
28 petition, ECF No. 1.

Sealing the documents would be the most narrowly tailored means to serve

¹ Federal Defenders of San Diego, Inc., is filing the amended habeas petition related to this motion with provisional appointment under Chief Judge Order No. 134. Mr. Drammeh's financial eligibility for representation is included in a sworn statement attached to his habeas petition.

1 a compelling interest. The lodged unredacted document and all *pro se* exhibits
2 contain information pertaining to the substance of applications for withholding of
3 removal, which is extremely private and regularly filed under seal as a matter of
4 case law and statute. *See, e.g., Doe v. Becerra*, No. 25-cv-00647-DJC-DMC, 787
5 F.Supp.3d 1083, 1096 (E.D. Cal. Mar. 3, 2025).

6 “Information contained in or pertaining to any application for asylum,
7 withholding of removal under section 241(b)(3) . . . , or protection under
8 regulations issued pursuant to the Convention Against Torture’s implementing
9 legislation . . . shall not be disclosed without the written consent of the applicant
10” 8 C.F.R. § 208.6; *see also Sakoyan v. Noem*, No. 25-cv-3406-BAS, ECF
11 No. 8 (S.D. Cal. Dec. 4, 2025) (granting motion to seal a motion to seal and
12 unredacted declaration containing information about a habeas petitioner’s grant of
13 withholding of removal); *Ndandu v. Noem*, No. 3:35-cv-02939-RBM-MSB, ECF
14 No. 2 at 3, 6 (S.D. Cal. Nov. 14, 2025) (granting in part petitioner’s motion to seal
15 documents containing information related to his asylum and CAT protection
16 applications);

17
18 Respectfully submitted,

19
20 Dated: December 19, 2025

s/ Jessie Agatstein

Federal Defenders of San Diego, Inc.

Attorneys for Mr. Drammeh

Email: jessie_agatstein@fd.org