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

11 **LUKA GIEBASHVILI,**

12 **Petitioner,**

13 **v.**

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

23 **Respondents.**

CASE NO.: 25-cv-3432-BJC-VET

Motion to file
documents under seal

24 Luka Giebashvili requests the lodged documents be filed under seal for the
 25 reasons explained in the lodged documents. For the reasons explained therein,
 26 sealing the documents under seal is the most narrowly tailored means to serve a
 27 compelling interest. Information pertaining to applications for withholding of
 28 removal are extremely private and regularly filed under seal. *See, e.g., Doe v.*

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

1 *Becerra*, No. 25-cv-00647-DJC-DMC, 787 F.Supp.3d 1083, 1096 (E.D. Cal. Mar.
2 3, 2025); *see also* 8 C.F.R. § 208.6 (mandating that such information not be
3 disclosed).

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5 Respectfully submitted,

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7 Dated: December 5, 2025

s/ Jessie Agatstein
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