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8 **UNITED STATES DISTRICT COURT**
9 **SOUTHERN DISTRICT OF CALIFORNIA**

11 JOSE CASTRO MARTINEZ,
12
13 Petitioner,
14 v.
15 CHRISTOPHER LaROSE, et al.,
16 Respondents.

Case No.: 25cv3449-DMS-MMP

**RESPONDENTS' MOTION TO
FILE DOCUMENTS UNDER
SEAL IN SUPPORT OF
RESPONSE IN OPPOSITION TO
PETITIONER'S MOTION FOR
TEMPORARY RESTRAINING
ORDER**

17 Respondents hereby apply to this Court for leave to file under seal an excerpt of the
18 medical records for Petitioner Jose Castro Martinez (Petitioner) during his time in
19 Immigration and Customs Enforcement Custody at the Otay Mesa Detention Center
20 (OMDC). Good cause and compelling reasons exist for filing such records under seal
21 as they contain sensitive and personal information of Petitioner.
22

23 DATED: December 11, 2025

Respectfully submitted,

25 ADAM GORDON
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26 s/Sheldon Smith
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28 Attorneys for Respondents