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Attorney for Petitioner L.R.G.

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

L.R.G.

Petitioner,

vs.

CHRISTOPHER J. LAROSE, Warden,
Otay Mesa Detention Center; DANIEL
BRIGHTMAN, Field Office Director,
San Diego Office of Detention and
Removal; TODD M. LYONS, Acting
Director, U.S. Immigration and Customs
Enforcement; and PAMELA BONDI,
Attorney General, U.S. Department of
Justice; and KRISTI NOEM, Secretary,
U.S. Department of Homeland Security

Respondents.

Case No.: 3:25-cv-03490-CAB-MSB

**NOTICE AND MOTION TO
PROCEED PSEUDONYMOUSLY**

1 PLEASE TAKE NOTICE that Petitioner L.R.G. (“Petitioner”) hereby
2 moves this Court for an Order allowing her to proceed in this matter using the
3 pseudonym “L.R.G.”


4 This motion is made pursuant to *Doe v. Advanced Textile Corp.*, 214 F.3d
5 1058 (9th Cir. 2000) on the grounds that L.R.G. is an asylum seeker from
6 Colombia who is present in the U.S. seeking protection from persecution. As
7 explained in the attached Memorandum of Points and Authorities, pseudonymity is
8 necessary to protect the privacy of Petitioner with regards to harm suffered in the
9 past, as well as her fear of more injury, harassment, and retaliation, including
10 persecution and torture, in the future.

11 L.R.G. has legitimate safety concerns about disclosing the details of her
12 asylum claim to the public. Revealing her identity will only serve to increase the
13 likelihood of future harm in the event she is repatriated to Colombia. The balance
14 of interests weighs in favor of anonymity, as the use of a pseudonym will not
15 prejudice Respondents in any way.

16 This Motion is based on this Notice and Motion, the Memorandum of Points
17 and Authorities attached hereto, the Declarations and Exhibits filed in support of
18 Petitioner’s Petition for Writ of Habeas Corpus, the records and pleadings on file
19 with this Court, and on such other evidence as may be presented at the hearing on
20 the motion

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22 Dated: December 9, 2025

Respectfully submitted,

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25 Linette Tobin
26 Attorney for Petitioner L.R.G.
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