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

13 **VIKTOR GRISHCHENKO,**
14
15 **Petitioner,**

CASE NO.: 25-cv-3514-JES-JLB

16 v.

**Motion to file
documents under seal**

17 **KRISTI NOEM, Secretary of the**
18 **Department of Homeland Security,**
19 **PAMELA JO BONDI, Attorney General,**
20 **TODD M. LYONS, Acting Director,**
21 **Immigration and Customs Enforcement,**
22 **JESUS ROCHA, Acting Field Office**
23 **Director, San Diego Field Office,**
24 **CHRISTOPHER LAROSE, Warden at**
25 **Otay Mesa Detention Center,**
26
27 **Respondents.**

28 Viktor Grishchenko requests the lodged documents be filed under seal for the reasons explained in the lodged documents. For the reasons explained therein, sealing the documents under seal is the most narrowly tailored means to serve a compelling interest. Information pertaining to applications for withholding of 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. Grishchenko'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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Respectfully submitted,

Dated: December 11, 2025

s/ Jessie Agatstein
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