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9 Attorneys for Petitioner¹
 10 FELIX ENI

11 UNITED STATES DISTRICT COURT
 12 SOUTHERN DISTRICT OF CALIFORNIA

13 FELIX ENI,
 14
 15 Petitioner,
 16
 17 v.

Case No.: 25-cv-3524-JLS-DEB

**Motion to file documents
 under seal**

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

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

1 Petitioner Felix Eni requests the lodged documents be filed under
2 seal for the reasons explained therein. For the reasons stated therein,
3 filing the documents under seal is the most narrowly tailored means to
4 serve a compelling interest. Information pertaining to applications for
5 withholding of removal are extremely private and regularly filed under
6 seal. *See, e.g., Doe v. Becerra*, No. 25-cv-00647-DJC-DMC, 787
7 F.Supp.3d 1083, 1096 (E.D. Cal. Mar. 3, 2025); *see also* 8 C.F.R. § 208.6
8 (mandating that such information not be disclosed).

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Respectfully submitted,

Dated: December 11, 2025

s/ Armilla Staley-Ngomo

Armilla Staley-Ngomo
Federal Defenders of San Diego, Inc.

Attorneys for Petitioner
FELIX ENI