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9 *Attorney for Petitioner Emine Sahin

10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**
12

13 UNITED STATES OF AMERICA,
14 Plaintiff,
15 v.
16 EMINE SAHIN,
17 Defendant.
18

Case No. 2:26-cv-00134-JAD-MDC

**MOTION FOR LEAVE TO FILE
EXHIBITS UNDER SEAL**

19 Undersigned counsel is filing Exhibit 5 in support of Ms. Sahin's Petition
20 for Writ of Habeas Corpus Under 18 U.S.C. § 2241 under seal. Because Exhibit 5
21 contains Ms. Sahin's sensitive medical information, there is a genuine concern
22 that the interest of public disclosure is outweighed by the risk of harm to Ms.
23 Sahin. Additionally, public disclosure could compromise ongoing governmental
24 investigations. This motion is filed pursuant to *Kamakana v. City and County of*
25 *Honolulu*, 447 F.3d 1172 (9th Cir. 2006) or *Ctr. for Auto Safety v. Chrysler Group,*
26 *LLC*, 809 F.3d 1092 (9th Cir. 2016).

1 For these reasons, undersigned counsel respectfully requests leave to file
2 Exhibit 5 under seal and requests this Court maintain it under seal.

3 Undersigned counsel will serve the sealed Exhibit 5 on the government via
4 First-Class Mail, postage pre-paid.

5 DATED: January 21, 2026.

6 Respectfully submitted,

7
8 /s/ Megan Hopper-Rebegea
MEGAN HOPPER-REBEGEA
9 Assistant Federal Public Defender
Attorney for Emine Sahin

10 /s/ Laura Barrera
11 LAURA BARRERA
12 Assistant Federal Public Defender
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CERTIFICATE OF SERVICE

I hereby certify that the foregoing has been filed on January 21, 2026. I certify that some of the participants in the case are not registered electronic filing system users. I have mailed the foregoing **MOTION FOR LEAVE TO FILE EXHIBIT 5 UNDER SEAL** document by First-Class Mail, postage pre-paid, or have dispatched it to a third-party commercial carrier for delivery within three calendar days, to the following person:

Reggie Rader Henderson Chief of Police 223 Lead St. Henderson, NV 89105	Todd Lyons 500 12th St SW Washington, DC 20536
Pam Bondi Attorney General U.S. Department of Justice 950 Pennsylvania Ave, NW, Washington, DC, 20530	Michael Bernanke Salt Lake City ICE Field Office Director 2975 Decker Lake Drive, Ste 100 West Valley City, UT 841179-6096
Kristi Noem Secretary of the Department of Homeland Security 2707 Martin Luther King Jr. Ave SE, Washington, DC 20528	

/s/ Victoria Lenzi

An Employee of the
Federal Public Defender

