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

9 SAEID ZAREI,

10 Petitioner,

11 v.

12 CHRISTOPHER LAROSE, Warden at Otay
13 Mesa Detention Center, et al.,

14 Respondents.
15

No.: 26-cv-2335-GPC-MMP

**Motion to file
documents under seal**

16 Mr. Zarei requests the lodged unredacted document, proposed Exhibit C to
17 his motion, be filed under seal. Exhibit C contains his sponsor's personally
18 identifiable information ("PII") and sensitive financial information.

19 There are "compelling reasons" for a narrowly tailored sealing order as to
20 only Exhibit C, "supported by specific factual findings that outweigh the general
21 history of access and the public policies favoring disclosure, such as the public
22 interest in understanding the judicial process." *Kamakana v. City & Cnty. of*
23 *Honolulu*, 447 F.3d 1172, 1178–79 (9th Cir. 2006).

24 Respectfully submitted,

25 Dated: May 14, 2026

26 *s/ Kara Hartzler*
Federal Defenders of San Diego, Inc.
27 Attorneys for Mr. Zarei
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