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

10 GENESIS ESCALONA RAMIREZ,

No.: 26-cv-2525-JLS-VET

11 Petitioner,

12 v.

**Motion to file
documents under seal**

13 MARKWAYNE MULLIN, Secretary of
14 the Department of Homeland Security,
TODD BLANCHE, Acting Attorney
15 General, TODD M. LYONS, Acting
16 Director, Immigration and Customs
Enforcement, JESUS ROCHA, Acting
17 Field Office Director, San Diego Field
Office, CHRISTOPHER LAROSE,
18 Warden at Otay Mesa Detention Center,

19 Respondents.
20

21 Ms. Escalona Ramirez requests the lodged unredacted document, proposed
22 Exhibit F to her petition, be filed under seal. Exhibit F contains her asylum
23 application and other information filed in support of her the immigration judge's
24 grant of asylum.

25 There are "compelling reasons" for a narrowly tailored sealing order as to
26 only Exhibit F, "supported by specific factual findings that outweigh the general
27 history of access and the public policies favoring disclosure, such as the public
28 interest in understanding the judicial process." *Kamakana v. City & Cnty. of*

1 *Honolulu*, 447 F.3d 1172, 1178–79 (9th Cir. 2006).

2 “Information contained in or pertaining to any application for asylum,
3 withholding of removal under section 241(b)(3) . . . , or protection under
4 regulations issued pursuant to the Convention Against Torture’s implementing
5 legislation . . . shall not be disclosed without the written consent of the applicant,”
6 as a general matter. 8 C.F.R. § 208.6. Ms. Escalona Ramirez’s proposed Exhibit F
7 contains her application for asylum and information submitted in support of it.
8 Other information relevant to the petition is filed publicly in other exhibits and
9 referred to as relevant in the petition in a general way that is narrowly tailored.

10 Specific information in an asylum application is sealed in federal court
11 because it could “subject [petitioners] to physical harm if made publicly
12 available.” *Andres-Lucas v. Mayorkas*, No. 21-cv-01121-BEN-WVG, 2021 WL
13 3929686, *4 (S.D. Cal. Sept. 2, 2021). “[R]etaliation from a foreign government
14 is recognized by the Ninth Circuit and other district courts as a sufficient basis” to
15 proceed via sealing. *Poozesh v. Pompeo*, No. 19-cv-1466-LJO-SKO, 2019 WL
16 6052363, *2 (E.D. Cal. Nov. 15, 2019) (allowing parties to proceed
17 pseudonymously in even more extreme circumstances than those present here).
18 *See also Sakoyan v. Noem*, No. 25-cv-3406-BAS, ECF No. 8 (S.D. Cal. Dec. 4,
19 2025) (granting motion to seal a motion to seal and unredacted declaration
20 containing information about a habeas petitioner’s grant of withholding of
21 removal); *Ndandu v. Noem*, No. 3:35-cv-02939-RBM-MSB, ECF No. 2 at 3, 6
22 (S.D. Cal. Nov. 14, 2025) (granting in part petitioner’s motion to seal documents
23 containing information related to his asylum and CAT protection applications);
24 *Doe v. Andrews*, 25-cv-00755-CDB, 2025 WL 2991186, *1 (E.D. Cal. Sept. 26,
25 2025) (granting respondent’s request to file documents under seal pursuant
26 to 8 C.F.R. § 208.6); *Doe v. Becerra*, No. 25-cv-00647-DJC-DMC, 787 F. Supp.
27 3d 1083, 1096 (E.D. Cal. Mar. 3, 2025) (ordering that any information related to
28 the Petitioner’s asylum application be filed under seal due to its potential to

1 identify Petitioner and the sensitive nature of their allegations); *Kharis v.*
2 *Sessions*, No. 18-cv-04800-JST, 2018 WL 5809432, *3 (N.D. Cal. Nov. 6, 2018)
3 (granting habeas petition and unopposed motion to seal portions of asylum
4 application pertaining to other individuals' applications based on compelling
5 reasons to keep information confidential, given the sensitive nature of asylum
6 applications alleging fear of persecution or harassment).

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9 Respectfully submitted,

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11 Dated: May 13, 2026

s/ Jessie Agatstein
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