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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

Manuel Garcia Ugalde,

Petitioner,

v.

David Venturella, *et al.*,

Respondents.

Case No. 2:26-cv-01243-APG-EJY

Motion for Leave to File Exhibits Under Seal

POINTS AND AUTHORITIES

Petitioner moves for leave to file certain exhibits, in support of his Second Amended Petition for Writ of Habeas Corpus, under seal pursuant to Federal Rule of Civil Procedure 5.2(d) and Local Rule 10-5:

No.	Date	Document
6.	04/02/2026	Medical Progress **FILED UNDER SEAL**
7.	04/03/2026	Medical Progress **FILED UNDER SEAL**
8.	04/14/2026	Medical Progress

No.	Date	Document
		FILED UNDER SEAL
9.	04/17/2026	Medical Progress **FILED UNDER SEAL**
11.	04/21/2026	Medical Progress **FILED UNDER SEAL**

While courts prefer the public retain access to judicial filings and documents, *see Nixon v. Warner Commc'ns Inc.*, 435 U.S. 589, 597 (1978), a party may request sealing of a judicial record by demonstrating "compelling reasons" to prevent public access. *Kamakana v. City and Cnty. of Honolulu*, 447 F.3d 1172, 1178 (9th Cir. 2006). Protecting the privacy of confidential medical records constitutes a compelling reason. *Id.* at 1187 (affirming decision to unseal all records except medical records).

Here, Petitioner has compelling reasons to request that the above exhibits be filed under seal because they include medical records. For these reasons, Petitioner respectfully requests the Court grant permission to file Exhibits 6-9; 11 under seal. Undersigned counsel will serve the sealed exhibits on the counsel for the Respondents' via electronic mail.

Dated June 29, 2026.

Respectfully submitted,

Rene L. Valladares
Federal Public Defender

/s/ Jennifer Joseph
Jennifer Joseph
Assistant Federal Public Defender

CERTIFICATE OF SERVICE

I hereby certify that the foregoing has been filed on June 29, 2026. I personally served a true and correct copy of the foregoing Motion for Leave to File Exhibits Under Seal by CM/ECF to the following individuals:

Ashlee Hesman Struck Love Acedo, PLC 3100 West Ray Road, Suite 300 Chandler, AZ 85226 Email: ahesman@strucklove.com *Attorney for John Mattos*	Tamer Botros Botros Virginia T. Tomova U.S. Attorney's Office for District of NV 501 Las Vegas Blvd S Suite 1100 Las Vegas, NV 89101 Email: tamer.botros@usdoj.gov Email: Virginia.Tomova@usdoj.gov *Attorneys for Interested Party, United States Attorneys' Office for the District of Nevada and Federal Respondents*

I further certify that some of the participants in the case are not registered electronic filing system users. The foregoing documents will be mailed by First-Class Mail, postage pre-paid, or dispatched to a third party commercial carrier for delivery within three calendar days, to the following person:

Manuel Garcia Ugalde [redacted] Nevada Southern Detention Center 2190 E. Mesquite Avenue Pahrump, NV 89060	

/s/ Lisa Keller
An Employee of the
Federal Public Defender