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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

YANLING XIE,

Petitioner,

v.

SERGIO ALBARRAN, Field Office Director of the San Francisco Immigration and Customs Enforcement Office; DAVID VENTURELLA, Acting Director of United States Immigration and Customs Enforcement; MARKWAYNE MULLIN, Secretary of the United States Department of Homeland Security; TODD BLANCHE, Acting Attorney General of the United States, acting in their official capacities,

Respondents.

CASE NO. 3:26-cv-07571

PETITIONER'S MOTION TO FILE UNDER SEAL PETITIONER' PSYCHOLOGICAL EVALUATION

ALIEN NUMBER: A [redacted]

Pursuant to Civil Local Rules 7-11 and 79-5, Petitioner Yanling Xie respectfully moves for leave to file under seal the confidential report of Petitioner prepared by Dr. Luis Perez, PSY.D, MSCP, CA License: PSY 19771 dated October 10, 2026. Petitioner submits it as Exhibit 1 in support of her statement on proposed safeguards.

The confidential report contains Petitioner's mental health diagnoses and other highly sensitive personal information. Petitioner seeks to seal only the confidential report. She does not seek to seal any other filing. Any discussion of the report in her public filings will be limited to general terms.

The confidential report consists almost entirely of confidential medical and psychological information. It is the individual's interest in keeping medical and mental health information private can constitute a compelling reason to seal.

If the confidential report is filed publicly, Petitioner's most private psychological history and trauma will become permanently available to anyone who visits the Clerk's Office. Federal Rule of Civil Procedure 5.2(c) limits remote electronic access in immigration cases, but it does not prevent public access at the courthouse. Disclosure would cause Petitioner embarrassment and emotional harm. It could re-traumatize Petitioner.

Redaction is not a workable alternative. Sensitive clinical pervades the confidential report, from the background history to the diagnostic conclusions. A redacted version would be largely blank and would serve no meaningful purpose. Petitioner has narrowly tailored her request. She seeks to seal only the confidential report.

Respectfully submitted,

Date: October 12, 2026

/s/ Connie Chan
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