

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,	)	
	)	26-cv-2189
Plaintiff,	)	
	)	Hon.
v.	)	
	)	
JASWINDER SINGH, Axx-xxx-668, a.k.a.	)	
SURINDER SINGH, Axx-xxx-279,	)	
Defendant.	)	
	)	
	)	
	)	

BRIEF IN SUPPORT OF MOTION TO SEAL

In this denaturalization case, the United States of America alleges that the Defendant used at least one false identity to seek an immigration benefit and willfully misrepresented his immigration history during his subsequent application for naturalization. To prove its case, the United States intends to rely on and compare information contained in the Defendant's immigration files, including his fingerprints, photographs, and applications for immigration benefits which include dates of birth, A-numbers, and family information.

Several legal authorities prohibit the public disclosure of the information contained in the Defendant's immigration files. The Privacy Act, 5 U.S.C. § 552a, prohibits government agencies from publicly disclosing any "record" maintained on an "individual" including identifying numbers, fingerprints, and photographs. DHS regulations further prohibit the public disclosure of any application for refugee admission, asylum, withholding of removal, or protection pursuant to the Convention Against Torture. 8 C.F.R. § 208.6. The Federal Rules of Civil Procedure preclude the public filing of dates of birth, social-security numbers, and minor names. Fed. R. Civ. P. 5.2(a).

Because the documents showing the Defendant's various identities are critical evidence in this case, the United States respectfully requests that the Court allow the parties to submit documents which contain information subject to the Privacy Act, 8 C.F.R. § 208.6, or Fed. R. Civ. P. 5.2(a) under seal pursuant to W.D. Mich. LCivR 10.6. As set forth in the proposed order accompanying this motion, the United States respectfully requests that this order apply to the documents submitted as exhibits to the complaint in this matter as well as all future submissions in this case by either party.

To preserve the qualified, common-law presumption of public access to judicial files in civil cases, the United States will file publicly available exhibits with the sensitive information redacted. However, documents subject to 8 C.F.R. § 208.6 must be entirely withheld from public disclosure under that regulation.

Accordingly, for the reasons set forth herein, the United States respectfully requests that the Court enter the proposed order granting the motion to seal.

Dated: July 29, 2026

Respectfully submitted,

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