

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO**

Civil Action No: 1:25-cv-2712

JOHN DOE,

Petitioner-Plaintiff,

v.

PAM BONDI, U.S. Attorney General; SIRCE E. OWEN, Director, Executive Office for Immigration Review; KRISTI NOEM, Secretary, United States Department of Homeland Security; TODD M. LYONS, Director, U.S. Immigration and Customs Enforcement; ROBERT GUADIAN, Denver Field Office Director, U.S. Immigration and Customs Enforcement; DAWN CEJA, Warden of Denver Contract Detention Facility,

Respondents-Defendants.

**PETITIONER'S REPLY IN SUPPORT OF MOTION TO PROCEED
UNDER PSEUDONYM**

Petitioner-Plaintiff, through undersigned Counsel, hereby files this Reply in Support of his Motion to Proceed Under Pseudonym.

“Respondents do not oppose Petitioner’s request to proceed without disclosing his name.” Dkt. 14. Respondents nevertheless request that the Court require Petitioner to proceed using his initials, asserting that referring to him as “John Doe” does not properly balance Respondents’ and the public’s interests. *Id.* at 4. Respondents fail to adequately explain how that is so.

As to Respondents, Petitioner has already disclosed his identity. Respondents have full and complete access to Petitioner’s records, as evidenced by their opposition to his motion for a temporary restraining order. Dkt. 13; Dkt. 13-1. Whether Petitioner is referred to by his initials or as “John Doe” makes no difference.

As to the public, Petitioner’s case number will still be available and searchable by members of the public, “lawyers[,] and judges,” Dkt. 14 at 4, who are accustomed to parties involved in lawsuits being listed as “John Doe.” Furthermore, in addition to failing to articulate how the general public would benefit from knowing Petitioner’s initials, Respondents ignore the very real danger of a malicious individual—particularly a government official from Petitioner’s home country—locating Petitioner by recognizing his initials, as [REDACTED]

[REDACTED] Dkt. 2 at ¶¶ 2, 8.

Moreover, the Immigration and Nationality Act’s implementing regulations prevent the government from disclosing any information “contained in or pertaining to” an application for asylum, withholding of removal, and protection under the Convention Against Torture. 8 C.F.R. § 208.6(a). This includes Petitioner’s initials. For this reason, countless courts have permitted petitioners to proceed as John Doe, particularly when they are an asylum-seeker. *See, e.g., Doe v.*

U.S. Immigr. & Customs Enf't, No. 1:23-CV-00971-MLG-JMR, 2024 WL 4389461, at *2 (D.N.M. Oct. 3, 2024) (“Numerous courts have recognized the unique vulnerabilities of asylum seekers and allowed them to proceed pseudonymously as a result.”) (collecting cases).

The Court should therefore grant Petitioner’s motion and permit him to proceed as “John Doe.”

Dated: September 19, 2025

/s/ Johnny Sinodis
Johnny Sinodis
Attorney for Petitioner