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8 UNITED STATES DISTRICT COURT
9 SOUTHERN DISTRICT OF CALIFORNIA

10 PEDRO PABLO EXPOSITO,

11 Petitioner,

12 vs.

13 KRISTI NOEM, et al.,

14 Respondents.
15

Case No. 25cv2399 RSH DEB

**RESPONDENTS' MOTION
TO FILE DOCUMENTS UNDER
SEAL IN SUPPORT OF
OPPOSITION TO PETITIONER'S
EX PARTE APPLICATION AND HIS
HABEAS PETITION**

16 Respondents hereby apply to this Court for leave to file under seal Petitioner's
17 medical records, as of September 16, 2025, during his time in Immigration and Customs
18 Enforcement custody. Good cause and compelling reasons exist for filing such records
19 under seal as they contain sensitive and personal information of Petitioner. *See, e.g., Harris*
20 *v. Wickham*, No. 320CV00557MMDCS, 2023 WL 7042032, at *2 (D. Nev. Oct. 26, 2023)
21 ("the plaintiff's interest in keeping his sensitive health information confidential outweighs
22 the public's need for direct access to the medical records.").

23 DATED: September 23, 2025

Respectfully submitted,

24 ADAM GORDON
25 United States Attorney

26 s/ Samuel W. Bettwy
27 SAMUEL W. BETTWY
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28 Attorneys for Respondents