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8 **UNITED STATES DISTRICT COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA**

10 **John Doe and Jane Doe,**
11 **Petitioners/Plaintiffs,**

12 **v.**

13 **U.S. Immigration and Customs**
14 **Enforcement (ICE);**
15 **Department of Homeland Security**
16 **(DHS);**
17 **Kristi Noem, Secretary of DHS;**
18 **Field Office Director, Enforcement and**
19 **Removal Operations (ERO), Los Angeles,**
20 **in their official capacities; and**
21 **John Doe ICE Officers 1-500, in their**
22 **individual capacities,**

23 **Respondents/Defendants.**

CASE NO:

Title: EX PARTE APPLICATION TO
PROCEED UNDER PSEUDONYM AND
FOR PROTECTIVE ORDER AND
APPLICATION TO SEAL SAFE AT
HOME ENROLLMENT LETTERS

Date:

Time:

Dept:

(OR SOONEST AVAILABLE DATE)

1 **NOTICE OF MOTION AND MOTION TO THE HONORABLE COURT, ALL PARTIES,**
2 **AND THEIR COUNSEL OF RECORD:**

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4 **PLEASE TAKE NOTICE that, Petitioners JOHN DOE and JANE DOE will move, and**
5 **hereby do move, for an order:**
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8 1. Permitting both Petitioners to proceed under the pseudonyms “John Doe” and “Jane Doe”;
9 2. Issuing a protective order safeguarding both Petitioners’ identities and personal
10 information;
11 3. Sealing the Safe at Home verification documents;
12 4. Protecting John Doe’s identity under Convention Against Torture provisions;
13 5. Granting such other and further relief as the Court deems just and proper.
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16 This motion is made pursuant to Federal Rule of Civil Procedure 10(a), Local Rule 79-5, the
17 United Nations Convention Against Torture ratified by the United States, 8 C.F.R. § 208.18,
18 California Government Code §§ 6205 et seq. (incorporated for pseudonym purposes), and the
19 Court’s inherent equitable powers.
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22 **MEMORANDUM OF POINTS AND AUTHORITIES**

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24 **I. INTRODUCTION**

25 Both Petitioners require pseudonymity and protection through complementary legal frameworks.
26 Petitioner Jane Doe is a verified participant in California’s Safe at Home Confidential Address
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1 Program. Petitioner John Doe is protected under the Convention Against Torture (CAT), which
2 prohibits disclosure that could lead to re-traumatization or exposure to persecutors.
3 Public disclosure of either Petitioner's identity would violate statutory protections, international
4 law obligations, and endanger their safety. This Court should recognize Petitioners' protected
5 status by permitting pseudonymous litigation and sealing supporting documents.
6

7 8 **II. STATEMENT OF FACTS**

9 Jane Doe AND John Doe are verified participant in California's Safe at Home program, as
10 demonstrated by the Exhibit List Safe At Home filed herewith under seal. Her participation
11 triggers statutory pseudonymity rights under California law, applicable in federal proceedings
12 where state protections intersect.
13

14 John Doe is also protected under the Convention Against Torture, which the United States has
15 ratified and incorporated into federal law at 8 C.F.R. § 208.18. CAT protections prohibit actions
16 that would expose protected individuals to their persecutors or cause re-traumatization.

17 Both Petitioners seek to litigate under pseudonym. The Safe at Home program requires only one
18 participant's verification to establish joint protected status where Petitioners appear together.
19

20 21 **III. LEGAL ARGUMENT**

22 **A. Pseudonymity Is Warranted Under Federal Law**

23 Federal courts permit pseudonymity when a party's anonymity outweighs prejudice and public
24 interest in disclosure (Does I thru XXIII v. Advanced Textile Corp., 214 F.3d 1058, 1068 (9th
25 Cir. 2000)). Factors include risk of retaliatory harm, reasonableness of fear, vulnerability,
26 prejudice, and public interest.
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1. Risk of Harm and Fear: CAT cases warrant anonymity due to torture risks (*Doe v. Sessions*, No. 18-cv-00023, 2018 WL 4637014 (E.D. Cal. Sept. 28, 2018)). Safe at Home enrollment evidences real threats; disclosure could enable tracking or retaliation.
2. Vulnerability: Petitioners' disabilities and family ties amplify risks; ICE's history of intimidation (balled fists, threats) shows reasonableness.
3. Prejudice and Public Interest: Respondents know true identities via prior interactions; pseudonyms do not hinder defense. Public interest favors protecting vulnerable litigants (*Advanced Textile*, 214 F.3d at 1071).

B. Convention Against Torture Requires Non-Disclosure

CAT obligations prohibit disclosure risking torture (*INS v. Cardoza-Fonseca*, 480 U.S. 421 (1987)). 8 C.F.R. § 208.18 implements this by barring actions exposing protected persons.

C. Sealing of Safe at Home Verification Is Required

Local Rule 79-5 requires good cause for sealing where overriding interest exists. Safety of program participants overrides public access (*NBC Subsidiary v. Superior Court*, 20 Cal.4th 1178 (1999), applied federally).

D. No Prejudice to Respondents

Respondents suffer no prejudice from pseudonymity where identities are available under protective conditions (Doe v. Rostker, 89 F.R.D. 158 (N.D. Cal. 1980)).

IV. APPLICATION TO FILE UNDER SEAL (LOCAL RULE 79-5)

Pursuant to Local Rule 79-5, Petitioners apply to file under seal the unredacted Safe at Home enrollment letters for both John Doe and Jane Doe (Exhibits). Redacted versions are attached publicly.

Good cause exists because an overriding interest in Petitioners' safety and privacy supports sealing these documents. Disclosure would defeat the purpose of the Safe at Home program (California Government Code §§ 6205 et seq.) and expose Petitioners to harm, retaliation, or re-traumatization under CAT protections (8 C.F.R. § 208.18). The sealing is narrowly tailored to only the verification letters containing identifying information. No less restrictive alternative exists, as redaction would still reveal protected status.

Respondents suffer no prejudice, as they are aware of Petitioners' identities through prior interactions and can access the documents under protective order if needed.

IV. EXHIBIT

EXHIBIT LIST SAFE AT HOME: Jane Doe's Safe at Home Program Verification Letter

- Confidential – Filed Under Seal
- Official certification of protected status
- Demonstrates compliance with statutory requirements for both Petitioners
- EXHIBIT LIST from the operative pleading containing John's CAT order

JOINT DECLARATION OF JOHN DOE AND JANE DOE

We, JOHN DOE and JANE DOE, declare:

1. We are petitioners/plaintiffs in this action. We make this declaration in support of our Motion to Proceed Under Pseudonym and for Protective Order.
2. JANE DOE and JOHN DOE are verified participant in California's Safe at Home Confidential Address Program. My participation is documented in the Exhibit List Safe At Home filed with this motion under seal. My true name, address, and identifying information are protected under California law.
3. JOHN DOE is protected under the Convention Against Torture, which prohibits disclosure that could lead to re-traumatization or exposure to persecutors. My protection arises under international law obligations ratified by the United States.
4. We seek to proceed under pseudonym in this litigation. This motion formalizes the protection necessary for our safety.
5. Public disclosure of our identities would violate both California statutory protections and international law obligations, and would expose us to risk of harm.

We declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on December 16, 2025.

John Doe Jane Doe

V. CONCLUSION

For the foregoing reasons, Petitioners respectfully request that this Court grant their motion in its entirety, protecting both Petitioners under domestic and international legal frameworks.

Respectfully Submitted, December 16, 2025.

John Doe Jane Doe

PROPOSED] ORDER GRANTING MOTION TO PROCEED UNDER PSEUDONYM AND FOR PROTECTIVE ORDER

Having reviewed the Motion to Proceed Under Pseudonym and for Protective Order filed by Petitioners John Doe and Jane Doe, along with the supporting declaration and exhibits, and good cause appearing therefor,

IT IS HEREBY ORDERED that:

1. The Motion is GRANTED;
2. Petitioners John Doe and Jane Doe are permitted to proceed under pseudonyms in this action;
3. A protective order is issued safeguarding Petitioners' identities and personal information from public disclosure;
4. The Safe at Home verification documents (Exhibits) are sealed pursuant to Local Rule 79-5;
5. John Doe's identity is protected under the Convention Against Torture provisions, and no disclosure shall be made that could lead to re-traumatization or exposure to persecutors;
6. All filings in this action shall use the pseudonyms, and any identifying information shall be redacted or filed under seal as necessary.

IT IS SO ORDERED.

Dated: _____, 2025. Signature _____

Judge _____ OF THE UNITED STATES DISTRICT COURT

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EXHIBIT LIST A - B

The seal of the State of California, featuring a grizzly bear, a miner, and a ship, with the text "THE GREAT SEAL OF THE STATE OF CALIFORNIA" and "EUREKA" at the top.

CALIFORNIA SECRETARY OF STATE

CALIFORNIA SECRETARY OF STATE

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