## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

D.V.D.; M.M.; E.F.D.; and O.C.G.,

Plaintiffs,

v.

U.S. DEPARTMENT OF HOMELAND SECURITY; Kristi NOEM, Secretary, U.S. Department of Homeland Security, in her official capacity; Pamela BONDI, U.S. Attorney General, in her official capacity; and Antone MONIZ, Superintendent, Plymouth County Correctional Facility, in his official capacity,

Defendants.

Civil Action No. 25-cv-10676-BEM

#### NOTICE OF MANUAL FILING UNDER SEAL WITH CLERK'S OFFICE

Notice is hereby given that the following exhibits in support of Plaintiffs' Emergency Motion for Temporary Restraining Order and Preliminary Injunction on Behalf of Plaintiff O.C.G. listed below were manually delivered to the Clerk's Office this morning for filing with the Court **under seal** pursuant to the Protective Order for Expedited Discovery Related to Plaintiff O.C.G., Dkt. 93, on a flash drive in electronic form:

- 1. A digital audio recording of Plaintiff O.C.G.'s master calendar hearing on June 17, 2024, labeled "[A Number] 6.17.2024.2 CONFIDENTIAL.wav," designated as confidential pursuant to the protective order, Dkt. 96;
- 2. A digital audio recording of Plaintiff O.C.G.'s individual merits hearing on February 19, 2025, labeled "[A Number] 2.19.2025 CONFIDENTIAL.wav," designated as confidential pursuant to the protective order, Dkt. 96;
  - 3. The declaration of Glenda Aldana Madrid, authenticating a transcription of

excerpts of the June 17, 2025 hearing (and attached transcription); and

4. The declaration of Anwen Hughes, authenticating a transcription of excerpts of the February 19, 2025 hearing (and attached transcription).

A date-stamped copy of the cover sheet submitted with the exhibits is attached to this filing as an exhibit. The original documents are maintained in the case file in the Clerk's Office.

Respectfully submitted,

Matt Adams\*

### s/Trina Realmuto

Trina Realmuto\*
Kristin Macleod-Ball\*
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## NATIONAL IMMIGRATION LITIGATION ALLIANCE

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Attorneys for Plaintiffs

Dated: May 20, 2025

<sup>\*</sup> Admitted pro hac vice

# **CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

s/ Kristin Macleod-Ball
Kristin Macleod-Ball

DATED: May 20, 2025