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18 **UNITED STATES DISTRICT COURT**  
19 **NORTHERN DISTRICT OF CALIFORNIA**  
20 **SAN FRANCISCO DIVISION**

21 THE REGENTS OF THE UNIVERSITY OF  
CALIFORNIA and JANET NAPOLITANO,  
22 in her official capacity as President of the  
University of California,

23 Plaintiffs,

24 v.

25 U.S. DEPARTMENT OF HOMELAND  
SECURITY and ELAINE DUKE, in her  
26 official capacity as Acting Secretary of the  
Department of Homeland Security,

27 Defendants.  
28

CASE NO. 17-CV-05211-WHA

**UNOPPOSED MOTION FOR PROTECTIVE  
ORDER**

[Proposed] Order filed concurrently herewith.

1 STATE OF CALIFORNIA, STATE OF  
2 MAINE, STATE OF MARYLAND, and  
STATE OF MINNESOTA,

3 Plaintiffs,

4 v.

5 U.S. DEPARTMENT OF HOMELAND  
6 SECURITY, ELAINE DUKE, in her official  
7 capacity as Acting Secretary of the Department  
of Homeland Security, and the UNITED  
STATES OF AMERICA,

8 Defendants.

CASE NO. 17-CV-05235-WHA

9 CITY OF SAN JOSE, a municipal corporation,

10 Plaintiffs,

11 v.

12 DONALD J. TRUMP, President of the United  
13 States, in his official capacity, ELAINE C.  
DUKE, in her official capacity, and the  
UNITED STATES OF AMERICA,

14 Defendants.

CASE NO. 17-CV-05329-WHA

15 DULCE GARCIA, MIRIAM GONZALEZ  
16 AVILA, SAUL JIMENEZ SUAREZ,  
17 VIRIDIANA CHABOLLA MENDOZA,  
NORMA RAMIREZ, and JIRAYUT  
LATTHIVONGSKORN,

18 Plaintiffs,

19 v.

20 UNITED STATES OF AMERICA, DONALD  
21 J. TRUMP, in his official capacity as President  
22 of the United States, U.S. DEPARTMENT OF  
HOMELAND SECURITY, and ELAINE  
23 DUKE, in her official capacity as Acting  
Secretary of Homeland Security,

24 Defendants.

CASE NO. 17-CV-05380-WHA

1 COUNTY OF SANTA CLARA and  
2 SERVICE EMPLOYEES INTERNATIONAL  
UNION LOCAL 521,

3 Plaintiffs,

4 v.

5 DONALD J. TRUMP, in his official capacity  
6 as President of the United States, JEFFERSON  
7 BEAUREGARD SESSIONS, in his official  
8 capacity as Attorney General of the United  
9 States; ELAINE DUKE, in her official  
capacity as Acting Secretary of the Department  
of Homeland Security; and U.S.  
DEPARTMENT OF HOMELAND  
SECURITY,

10 Defendants.

CASE NO. 17-CV-05813-WHA

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1 Plaintiffs respectfully submit this Unopposed Motion for Protective Order and Proposed  
2 Order in order to request permission, pursuant to Federal Rule of Civil Procedure 5.2(e)(1), to redact  
3 four discrete and limited categories of information from the exhibits filed with their respective  
4 declarations in support of Plaintiffs' Motion for a Preliminary Injunction. Plaintiffs have conferred  
5 with Defendants, and Defendants do not oppose this motion.

6 Certain exhibits to Plaintiffs' declarations contain categories of sensitive personal  
7 information that merit protection. First, the declarations contain alien registration numbers ("A-  
8 numbers"), the unique identification numbers assigned to noncitizens by USCIS at the time the  
9 noncitizen's file is created. The Department of Homeland Security itself considers A-numbers to be  
10 sensitive personally identifying information.<sup>1</sup> Second, the exhibits contain USCIS account numbers,  
11 unique numbers assigned by USCIS to a Deferred Action for Childhood Arrival ("DACA")  
12 applicant's electronic account that is used to view and track Plaintiffs' applications and paperwork  
13 with USCIS. Third, the exhibits contain sensitive personal financial information such as annual  
14 income and annual expenses. Finally, the exhibits contain employment authorization card numbers  
15 and categories, which appear on their USCIS-issued employment authorization documents. There is  
16 good cause to redact this information, as Plaintiffs would suffer harm, including potential identity  
17 theft, embarrassment, and discrimination, if these categories of sensitive and identifying personal  
18 information were to be made public. Further, these discrete, limited categories of information are  
19 not relevant to the relief Plaintiffs are seeking, and thus it is not necessary to file unredacted versions  
20 under seal.

21 Therefore, Plaintiffs respectfully request permission to redact the following categories of  
22 information: (1) alien registration numbers, (2) USCIS account numbers, (3) annual income and  
23 annual expenses, and (4) employment authorization card numbers and categories.

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26 <sup>1</sup> See *Handbook for Safeguarding Sensitive Personally Identifiable Information, Department of*  
27 *Homeland Security*, March 2012, 6–7, available at [https://www.dhs.gov/sites/default/files/publications/](https://www.dhs.gov/sites/default/files/publications/Handbook%20for%20Safeguarding%20Sensitive%20PII_0.pdf)  
28 *Handbook%20for%20Safeguarding%20Sensitive%20PII\_0.pdf* (identifying the A-number as sensitive information  
that "requires special handling because of the increased risk of harm to an individual if it is compromised.")

1 Dated: November 1, 2017

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**ATTESTATION**

I, Ethan Dettmer, hereby attest, pursuant to Civil L.R. 5-1, that I have received authorization to electronically sign and file this document from each of the persons identified in the signature block.

Dated: November 1, 2017

/s/ Ethan Dettmer  
Ethan Dettmer

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18 **UNITED STATES DISTRICT COURT**  
19 **NORTHERN DISTRICT OF CALIFORNIA**  
20 **SAN FRANCISCO DIVISION**

21 THE REGENTS OF THE UNIVERSITY OF  
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22 in her official capacity as President of the  
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23 Plaintiffs,

24 v.

25 U.S. DEPARTMENT OF HOMELAND  
SECURITY and ELAINE DUKE, in her  
26 official capacity as Acting Secretary of the  
Department of Homeland Security,

27 Defendants.  
28

CASE NO. 17-CV-05211-WHA

**[PROPOSED] PROTECTIVE ORDER**

1 STATE OF CALIFORNIA, STATE OF  
2 MAINE, STATE OF MARYLAND, and  
STATE OF MINNESOTA,

3 Plaintiffs,

4 v.

5 U.S. DEPARTMENT OF HOMELAND  
6 SECURITY, ELAINE DUKE, in her official  
7 capacity as Acting Secretary of the Department  
of Homeland Security, and the UNITED  
STATES OF AMERICA,

8 Defendants.

CASE NO. 17-CV-05235-WHA

9 CITY OF SAN JOSE, a municipal corporation,

10 Plaintiffs,

11 v.

12 DONALD J. TRUMP, President of the United  
13 States, in his official capacity, ELAINE C.  
DUKE, in her official capacity, and the  
UNITED STATES OF AMERICA,

14 Defendants.

CASE NO. 17-CV-05329-WHA

15 DULCE GARCIA, MIRIAM GONZALEZ  
16 AVILA, SAUL JIMENEZ SUAREZ,  
17 VIRIDIANA CHABOLLA MENDOZA,  
18 NORMA RAMIREZ, and JIRAYUT  
LATTHIVONGSKORN,

19 Plaintiffs,

20 v.

21 UNITED STATES OF AMERICA, DONALD  
22 J. TRUMP, in his official capacity as President  
of the United States, U.S. DEPARTMENT OF  
23 HOMELAND SECURITY, and ELAINE  
DUKE, in her official capacity as Acting  
Secretary of Homeland Security,

24 Defendants.

CASE NO. 17-CV-05380-WHA

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COUNTY OF SANTA CLARA and  
SERVICE EMPLOYEES INTERNATIONAL  
UNION LOCAL 521,  
  
Plaintiffs,  
  
v.  
  
DONALD J. TRUMP, in his official capacity  
as President of the United States, JEFFERSON  
BEAUREGARD SESSIONS, in his official  
capacity as Attorney General of the United  
States; ELAINE DUKE, in her official  
capacity as Acting Secretary of the Department  
of Homeland Security; and U.S.  
DEPARTMENT OF HOMELAND  
SECURITY,  
  
Defendants.

CASE NO. 17-CV-05813-WHA

United States District Court  
Northern District of California

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IT IS HEREBY ORDERED that, pursuant to Federal Rule of Civil Procedure 5.2(e)(1), Plaintiffs may redact the following categories of information from their declarations in support of Plaintiff's Motion for a Preliminary Injunction and from any exhibits to those declarations:

1. alien registration numbers,
2. USCIS account numbers,
3. annual income and annual expenses,, and
4. employment authorization card numbers and categories.

IT IS SO ORDERED.

DATED: \_\_\_\_\_

The Honorable William H. Alsup