

Steven M. Wilker, OSB No. 911882
Email: steven.wilker@tonkon.com
Tonkon Torp LLP
1600 Pioneer Tower
888 SW 5th Avenue
Portland, OR 97204
Tel.: (503) 802-2040; Fax: (503) 972-3740
Cooperating Attorney for the ACLU Foundation of Oregon

Hina Shamsi (Admitted *pro hac vice*)
Email: hshamsi@aclu.org
Hugh Handeyside (Admitted *pro hac vice*)
Email: hhandeyside@aclu.org
American Civil Liberties Union Foundation
125 Broad Street, 18th Floor
New York, NY 10004
Tel.: (212) 519-2500; Fax: (212) 549-2654

Ahilan T. Arulanantham (Admitted *pro hac vice*)
Email: aarulanantham@aclu-sc.org
Catherine A. Wagner (Admitted *pro hac vice*)
Email: cwagner@aclu-sc.org
ACLU Foundation of Southern California
1313 West Eighth Street
Los Angeles, CA 90017
Tel.: (213) 977-9500; Fax: (213) 977-5297

Alan L. Schlosser (Admitted *pro hac vice*)
Email: aschlosser@aclunc.org
Julia Harumi Mass (Admitted *pro hac vice*)
Email: jmass@aclunc.org
ACLU Foundation of Northern California
39 Drumm Street
San Francisco, CA 94111
Tel.: (415) 621-2493; Fax: (415) 255-8437

Alexandra F. Smith (Admitted *pro hac vice*)
Email: asmith@aclu-nm.org
ACLU Foundation of New Mexico
P.O. Box 566
Albuquerque, NM 87103
Tel.: (505) 266-5915; Fax: (505) 266-5916

Mitchell P. Hurley (Admitted *pro hac vice*)
Email: mhurley@akingump.com
Christopher M. Egleson (Admitted *pro hac vice*)
Email: cegleson@akingump.com
Justin H. Bell (Admitted *pro hac vice*)
Email: bellj@akingump.com
Akin Gump Strauss Hauer & Feld LLP
One Bryant Park
New York, NY 10036
Tel.: (212) 872-1011; Fax: (212) 872-1002

Attorneys for Plaintiff Mohamed Sheikh Abdirahman Kariye

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON

AYMAN LATIF, et al., <p style="text-align:center"><i>Plaintiffs,</i></p> v. LORETTA LYNCH, et al., <p style="text-align:center"><i>Defendants.</i></p>	Case 3:10-cv-00750-BR <p style="text-align:center">CONSENT MOTION TO UNSEAL DOCUMENTS AND INFORMATION RELEVANT TO PLAINTIFF KARIYE</p>
---	--

LR 7-1 CERTIFICATION

In accordance with LR 7-1, the parties certify that they conferred in good faith regarding the need for this motion and resolved all areas in controversy. Accordingly, Plaintiff Mohamed Sheikh Abdirahman Kariye respectfully requests that the Court grant this motion to unseal the unredacted versions of documents currently under seal relevant to him, so that they may appear on the public docket.

MOTION

Plaintiff Mohamed Sheikh Abdirahman Kariye moves, with Defendants' consent, to unseal certain documents that were previously filed under seal. Pursuant to the Stipulated Protective Order filed in this matter on March 11, 2015 (ECF No. 182), Mr. Kariye designated specific documents relevant to him as "Confidential" out of concern that public disclosure of allegations contained in those documents would further stigmatize him and raise security issues for him and his family. On July 20, 2015, the government filed on the public record a denaturalization complaint against Mr. Kariye containing allegations that substantially overlap with those previously designated "Confidential" in this matter. *See U.S. v. Kariye*, Case No. 3:15-cv-1343 (D. Or. filed July 20, 2015).

Accordingly, Plaintiff Kariye moves to unseal in full the following unredacted versions of documents that have been filed under seal by either party:

- ECF No. 184: Exhibits A (DHS TRIP Notification Letter, dated November 26, 2014), B (DHS TRIP Response Letter, dated December 16, 2014), and C

(Determination Letter, dated January 21, 2015) to the Joint Statement of Agreed Facts Relevant to Plaintiff Mohamed Sheikh Abdirahman Kariye;

- ECF No. 221: Memorandum of Points and Authorities in Support of Plaintiff Mohamed Sheikh Abdirahman Kariye's Renewed Motion for Partial Summary Judgment;
- ECF No. 239: Defendants' Cross-Motion for Partial Summary Judgment: Plaintiff Mohamed Sheikh Abdirahman Kariye; and
- ECF No. 272: Plaintiff Mohamed Sheikh Abdirahman Kariye's Opposition to Defendants' Cross-Motion for Summary Judgment and Reply in Support of His Renewed Motion for Partial Summary Judgment.

Plaintiff Kariye reserves the right to seek to file documents pertaining to him under seal in the future, or to request that Defendants do so, if those documents contain materially different allegations than those that the government revealed in its denaturalization complaint.

Dated: August 26, 2015

Steven M. Wilker, OSB No. 911882
Email: steven.wilker@tonkon.com
Tonkon Torp LLP
1600 Pioneer Tower
888 SW 5th Avenue
Portland, OR 97204
Tel.: (503) 802-2040; Fax: (503) 972-3740
Cooperating Attorney for the ACLU
Foundation of Oregon

s/Catherine A. Wagner
Catherine A. Wagner (Admitted *pro hac vice*)
Email: cwagner@aclu-sc.org
Ahilan T. Arulanantham (Admitted *pro hac vice*)
Email: aarulanantham@aclu-sc.org
ACLU Foundation of Southern California
1313 West Eighth Street
Los Angeles, CA 90017
Tel.: (213) 977-9500; Fax: (213) 977-5297

Hina Shamsi (Admitted *pro hac vice*)
Email: hshamsi@aclu.org
Hugh Handeyside (Admitted *pro hac vice*)
Email: hhandeyside@aclu.org
American Civil Liberties Union Foundation
125 Broad Street, 18th Floor
New York, NY 10004
Tel.: (212) 519-2500; Fax: (212) 549-2654

Alan L. Schlosser (Admitted *pro hac vice*)
Email: aschlosser@aclunc.org
Julia Harumi Mass (Admitted *pro hac vice*)
Email: jmass@aclunc.org
ACLU Foundation of Northern California
39 Drumm Street
San Francisco, CA 94111
Tel.: (415) 621-2493; Fax: (415) 255-8437

Alexandra F. Smith (Admitted *pro hac vice*)
Email: asmith@aclu-nm.org
ACLU Foundation of New Mexico
P.O. Box 566
Albuquerque, NM 87103
Tel.: (505) 266-5915; Fax: (505) 266-5916

Mitchell P. Hurley (Admitted *pro hac vice*)
Email: mhurley@akingump.com
Christopher M. Egleson (Admitted *pro hac vice*)
Email: cegleson@akingump.com
Justin H. Bell (Admitted *pro hac vice*)
Email: bellj@akingump.com
Akin Gump Strauss Hauer & Feld LLP
One Bryant Park
New York, NY 10036
Tel.: (212) 872-1011; Fax: (212) 872-1002

*Attorneys for Plaintiff Mohamed Sheikh Abdirahman
Kariye*

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing motion was delivered to all counsel of record via the Court's ECF notification system.

s/ Catherine A. Wagner
Catherine A. Wagner