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9 **UNITED STATES DISTRICT COURT**
10 **FOR THE SOUTHERN DISTRICT OF CALIFORNIA**

11 AL OTRO LADO, Inc., et al.,

12
13 Plaintiffs,

14 v.

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16 DONALD J. TRUMP, President of the
United States, in his official capacity, et al.,

17 Defendants.
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Case No. 3:25-cv-01501-RBM-BLM

**DEFENDANTS' RESPONSE TO
PLAINTIFFS' MOTION TO
PROCEED PSEUDONYMOUSLY
(ECF NO. 34)**

DATE: September 2, 2025

TIME: None Set

CTRM: 5B

Hon. Ruth Bermudez Montenegro

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1 Defendants oppose Plaintiffs’ motion to proceed pseudonymously because it
2 fails to provide clarity on the restrictions Plaintiffs seek to impose on Defendants’
3 access to, and use of, Plaintiffs’ actual names. Specifically, Plaintiffs represent in their
4 motion that they will provide Defendants with the Individual Plaintiffs’ identifying
5 information “subject to certain confidentiality assurances.” ECF No. 34 at 7. But
6 without clarity on the confidentiality measures Plaintiffs will seek, Defendants cannot
7 evaluate whether such restrictions would be unduly burdensome or unfairly impede
8 Defendants’ ability to defend this case. There have been some informal discussions
9 between counsel for the parties, but clarity on the issues will not occur until the parties
10 fully negotiate, and the Court approves, the terms of a protective order.

11 In the Ninth Circuit, “the common law rights of access to the courts and judicial
12 records are not taken lightly.” *Doe v. Kamehameha Sch./Bernice Pauahi Bishop Est.*,
13 596 F.3d 1036, 1042 (9th Cir. 2010). For this reason, Defendants request that the Court
14 consider this right to public access when deciding how the Individual Plaintiffs’ names
15 appear in publicly filed documents and judicial records.

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DATED: August 12, 2025

Respectfully submitted,

ADAM GORDON
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s/ Ernest Cordero, Jr.
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DONALD J. TRUMP, et al.