

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF
CALIFORNIA

Angel Martinez Echeverria v. James Janecka et al.

Echeverria v. Janecka · No. 5:25-cv-03070-MRA-DTB · Decided November 21, 2025

SUMMARY

The Central District of California issued an order to show cause concerning whether a habeas petition should be transferred to the Eastern District of California. The court noted conflicting information regarding the petitioner’s detention location and ordered the parties to explain why transfer should not occur by November 24, 2025.

CASE DETAILS

COURT	United States District Court for the Central District of California
WRITING FOR THE COURT	Monica Ramirez Almadant
JURISDICTION	United States District Court for the Central District of California
DECIDED	November 21, 2025
DOCKET	5:25-cv-03070-MRA-DTB
DISPOSITION	other
PROCEDURAL POSTURE	Petitioner brought a federal habeas corpus petition and an ex parte application for a temporary restraining order. Respondents moved to dismiss for lack of jurisdiction, and the court issued an order to show cause regarding transfer to the Eastern District of California.
PRECEDENTIAL VALUE	nonprecedential interlocutory order
PARTIES	Angel Martinez Echeverria v. James Janecka et al.

TOPICS

- federal habeas corpus
- immigration detention
- venue
- subject matter jurisdiction

PRACTICE AREAS

- federal habeas corpus
- immigration detention
- immigration

QUESTIONS PRESENTED

1. Whether the habeas matter should be transferred to the Eastern District of California based on the location of Petitioner's detention when the petition was filed.
2. Whether a transfer, rather than dismissal, is the appropriate course if the action was filed in the incorrect venue.

HOLDINGS

1. For purposes of habeas corpus relief, jurisdiction attaches when the petition is initially filed and is not destroyed by the petitioner's subsequent transfer or accompanying custodial change.

KEY QUOTATIONS

“jurisdiction attaches on initial filing for habeas corpus relief, and it is not destroyed by a transfer of the petitioner and the accompanying custodial change.”

FACTUAL BACKGROUND

Petitioner was in immigration custody. His filings stated that he was detained at the Adelanto Detention Center in Adelanto, California, within the Central District of California, while Respondents represented that he had been held at the Golden State Annex in McFarland, California, within the Eastern District of California, since September 17, 2025. Petitioner did not directly refute Respondents' representation concerning his place of detention when the habeas petition was filed.

PROCEDURAL HISTORY

Petitioner filed a petition for a writ of habeas corpus and an ex parte application for a temporary restraining order in the Central District of California. Respondents asserted that Petitioner had been detained in the Eastern District of California since September 17, 2025, and moved to dismiss for lack of jurisdiction. Petitioner argued that, if venue was improper, the action should be transferred rather than dismissed. The court ordered the parties to show cause why the matter should not be transferred to the Eastern District of California.

DISPOSITION

other

CASES CITED

- Francis v. Rison, 894 F.3d 353, 354 (9th Cir. 1990)