

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
CALIFORNIA

Hrachya Sakoyan v. Kristi Noem, et al.

Sakoyan · No. 25-cv-03406-BAS-MSB · Decided December 4, 2025

SUMMARY

The United States District Court for the Southern District of California orders the Government to respond to Hrachya Sakoyan’s 28 U.S.C. § 2241 habeas petition challenging his immigration detention. The Court sets briefing and a hearing schedule, confirms appointed counsel, and grants Petitioner’s motion to seal Exhibit A based on the sensitive information concerning his withholding-of-removal claim and alleged persecution.

CASE DETAILS

COURT	United States District Court for the Southern District of California
WRITING FOR THE COURT	Cynthia Bashant
JURISDICTION	United States District Court for the Southern District of California
DECIDED	December 4, 2025
DOCKET	25-cv-03406-BAS-MSB
DISPOSITION	other
PROCEDURAL POSTURE	Petitioner filed a petition for a writ of habeas corpus under 28 U.S.C. § 2241 challenging his immigration detention and a motion to seal an exhibit. The court declined to summarily dismiss the petition, ordered the Government to respond, set a hearing, and granted the motion to seal.
STANDARD OF REVIEW	The court applied the standard governing summary dismissal of habeas petitions and the Ninth Circuit standard for sealing judicial records, requiring compelling reasons for sealing filings more than tangentially related to the merits.
PRECEDENTIAL VALUE	unpublished district court order

TOPICS

- immigration detention
- federal habeas corpus
- removal proceedings
- asylum
- immigration

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the § 2241 petition warranted summary dismissal at the initial review stage.
2. Whether Exhibit A to the petition should be filed under seal because it contained sensitive information concerning Petitioner's withholding-of-removal claim and the basis of persecution.

HOLDINGS

1. Summary dismissal was unwarranted at that time; the Government was required to respond to the petition and the court set a hearing.
2. The motion to seal Exhibit A was granted because the exhibit was more than tangentially related to the merits and compelling reasons existed to overcome the presumption of public access.

KEY QUOTATIONS

“Summary dismissal is appropriate only where the allegations in the petition are vague or conclusory, palpably incredible, or patently frivolous or false.” (at 1)

“A party seeking to seal a judicial record bears the burden of overcoming the strong presumption of access.” (at 2)

FACTUAL BACKGROUND

Petitioner Hrachya Sakoyan alleged that he was detained by Immigration and Customs Enforcement in violation of immigration laws and *Zadvydas v. Davis*. He submitted an exhibit containing sensitive information about his claim for withholding of removal and the basis of persecution. The court determined that the petition was not vague, conclusory, palpably incredible, patently frivolous, or false on its face, and that compelling reasons supported sealing the exhibit.

PROCEDURAL HISTORY

Hrachya Sakoyan filed a § 2241 habeas petition alleging that Immigration and Customs Enforcement was detaining him in violation of immigration laws and *Zadvydas v. Davis*. He also moved to seal an exhibit containing sensitive information concerning his withholding-of-removal claim and the basis of persecution. The court found summary dismissal unwarranted at that stage, ordered a Government response and hearing, and granted the motion to seal.

DISPOSITION

other

CASES CITED

- *Zadvydas v. Davis*, 533 U.S. 678 (2001)
- *Kourteva v. INS*, 151 F. Supp. 2d 1126, 1128 (N.D. Cal. 2001)

- Foltz v. State Farm Mut. Auto. Ins. Co., 331 F.3d 1122, 1135 (9th Cir. 2003)
- Ctr. for Auto Safety v. Chrysler Grp., LLC, 809 F.3d 1092, 1101 (9th Cir. 2016)
- Doe v. Becerra, 787 F. Supp. 3d 1083, 1096 (E.D. Cal. 2025)

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