

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF
CALIFORNIA

Henrikh Vardanyan v. Warden, Adelanto ICE Processing Center, et
al.

Vardanyan · No. 5:25-cv-03272-SVW (SK) · Decided January 14, 2026

SUMMARY

The United States District Court orders petitioner Henrikh Vardanyan to show cause why his 28 U.S.C. § 2241 habeas petition should not be dismissed as moot. Respondents reported that Vardanyan received an individualized Rodriguez bond hearing after filing the petition, but the Immigration Judge denied bond. The court directs petitioner to respond within 14 days and warns that failure to respond may result in dismissal for mootness, lack of prosecution, or noncompliance with court orders.

CASE DETAILS

COURT	United States District Court for the Central District of California
WRITING FOR THE COURT	Steve Kim
JURISDICTION	United States District Court for the Central District of California
DECIDED	January 14, 2026
DOCKET	5:25-cv-03272-SVW (SK)
DISPOSITION	other
PROCEDURAL POSTURE	Petitioner filed a 28 U.S.C. § 2241 habeas petition challenging prolonged immigration detention without a bond hearing. After respondents reported that petitioner had received an individualized bond hearing, the court ordered petitioner to show cause why the petition should not be dismissed as moot.
STANDARD OF REVIEW	Mootness is considered sua sponte, and the court must determine whether a present controversy remains for which effective relief can be granted.
PRECEDENTIAL VALUE	unpublished
PARTIES	Henrikh Vardanyan v. Warden, Adelanto ICE Processing Center, et al.

TOPICS

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PRACTICE AREAS

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QUESTIONS PRESENTED

1. Whether petitioner's receipt of an individualized bond hearing potentially deprived the court of the ability to grant effective relief, rendering the habeas petition moot.
2. Whether petitioner should be required to show cause why the petition should not be dismissed as moot.

HOLDINGS

1. Because petitioner received an individualized bond hearing after filing the petition, the court ordered petitioner to show cause why the petition should not be dismissed as moot.

KEY QUOTATIONS

“The “basic question in determining mootness is whether there is a present controversy as to which effective relief can be granted.””

“A case becomes moot when interim relief or events have deprived the court of the ability to redress the party’s injuries.”

FACTUAL BACKGROUND

Petitioner was detained in immigration custody and challenged his prolonged detention without a bond hearing under 28 U.S.C. § 2241. Four days after filing the petition, he received an individualized Rodriguez bond hearing. The Immigration Judge denied bond after finding petitioner a flight risk and danger to the community.

PROCEDURAL HISTORY

Vardanyan filed the petition on December 4, 2025. The court ordered respondents to show cause why petitioner should not receive an individualized bond hearing. Respondents reported that petitioner received a Rodriguez bond hearing on December 8, 2025, at which the Immigration Judge denied bond. The court then issued this order directing petitioner to show cause why the petition should not be dismissed as moot; no dismissal had yet been entered.

DISPOSITION

other

CASES CITED

- Rodriguez v. Robbins, 804 F.3d 1060, 1087 (9th Cir. 2015)
- Jennings v. Rodriguez, 538 U.S. 281 (2018)

- *Nw. Env't Def. Ctr. v. Gordon*, 849 F.2d 1241, 1244 (9th Cir. 1988)
- *United States v. Alder Creek Water Co.*, 823 F.2d 343, 345 (9th Cir. 1987)
- *In re Burrell*, 415 F.3d 994, 997 (9th Cir. 2005)

OPINION

CIVIL MINUTES – GENERAL Case No. 5:25-cv-03272-SVW (SK) Date: January 14, 2026 Title *Henrikh Vardanyan v. Warden, Adelanto ICE Processing Center, et al.* Present: The Honorable: Steve Kim, United States Magistrate Judge Connie Chung n/a Deputy Clerk Court Reporter / Recorder Attorneys Present for Petitioner: Attorneys Present for Respondent: None present None present Proceedings: (IN CHAMBERS) ORDER TO SHOW CAUSE WHY PETITION SHOULD NOT BE DISMISSED AS MOOT On December 4, 2025, petitioner Henrikh Vardanyan filed a habeas petition under 28 U.S.C. § 2241 challenging his prolonged detention without a bond hearing.

(ECF 1). After briefing, the court ordered respondents to show cause why petitioner should not receive an individualized bond hearing. (ECF 8). In response, respondents explained that petitioner received an individualized Rodriguez bond hearing on December 8, 2025—four days after the petition was filed. (ECF 10 at 4). Rodriguez hearings require the Department of Homeland Security (“DHS”) to establish by clear and convincing evidence that prolonged detention is necessary.

Rodriguez v. Robbins, 804 F.3d 1060, 1087 (9th Cir. 2015), rev’d sub nom. *Jennings v. Rodriguez*, 538 U.S. 281 (2018). Evidently, DHS met its burden, and the Immigration Judge denied bond explaining petitioner is a “flight risk/danger to community.” (ECF 10-1; ECF 10-2). Respondents now suggest the petition is moot because petitioner received the relief he sought—immediate release or a custody redetermination hearing.

(ECF 10 at 9; see ECF 1 at 5). The “basic question in determining mootness is whether there is a present controversy as to which effective relief can be granted.” *Nw. Env't Def. Ctr. v. Gordon*, 849 F.2d 1241, 1244 (9th Cir. 1988). “A case becomes moot when interim relief or events have deprived the court of the ability to redress the party’s injuries.” *United States v. Alder Creek Water Co.*, 823 F.2d 343, 345 (9th Cir.

1987). Further, CIVIL MINUTES – GENERAL Case No. 5:25-cv-03272-SVW (SK) Date: January 14, 2026 Title *Henrikh Vardanyan v. Warden, Adelanto ICE Processing Center, et al.* courts have a duty to consider mootness sua sponte and should deny requested relief where it is superfluous.

In re Burrell, 415 F.3d 994, 997 (9th Cir. 2005). Accordingly, petitioner is ordered to show cause why the petition should not be dismissed as moot. Petitioner may discharge this order by signing and returning the attached Form CV-09y within 14 days of the date of this order. Failure to return

that form on time as ordered or to otherwise timely respond in writing to this order may be deemed petitioner's consent to voluntary dismissal of the petition for the reasons set forth in this order, or it can lead to the immediate closing of this case with no further notice for lack of prosecution and noncompliance with court orders.

See Fed. R. Civ. P. 41(b); L.R. 41-1. IT IS SO ORDERED.