

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF  
CALIFORNIA

Castillo v. Johnson

Castillo · No. 3:25-cv-00928-JAH-BLM · Decided August 5, 2025

SUMMARY

The United States District Court for the Southern District of California denied Jose L. Castillo’s 28 U.S.C. § 2241 petition challenging his pretrial detention as moot. The court concluded that Castillo’s release on bond eliminated the live case or controversy and denied the accompanying motions, closing the matter without prejudice.

CASE DETAILS

|                    |                                                                                                                                                                          |
|--------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| COURT              | United States District Court for the Southern District of California                                                                                                     |
| JURISDICTION       | United States District Court for the Southern District of California                                                                                                     |
| DECIDED            | August 5, 2025                                                                                                                                                           |
| DOCKET             | 3:25-cv-00928-JAH-BLM                                                                                                                                                    |
| DISPOSITION        | dismissed                                                                                                                                                                |
| PROCEDURAL POSTURE | Petitioner sought habeas relief under 28 U.S.C. § 2241 from his federal pretrial detention. The court denied the petition as moot after petitioner was released on bond. |
| STANDARD OF REVIEW | Article III case-or-controversy and mootness analysis.                                                                                                                   |
| PRECEDENTIAL VALUE | Unknown; district court order designated per curiam, with no published reporter citation.                                                                                |
| PARTIES            | Jose L. Castillo v. Timothy Johnson                                                                                                                                      |

TOPICS

- federal habeas corpus
- habeas corpus
- criminal procedure
- constitutional law

PRACTICE AREAS

- Federal habeas corpus
- Criminal procedure
- Mootness

QUESTIONS PRESENTED

1. Whether Castillo's § 2241 challenge to his federal pretrial detention remained a live case or controversy after he was released on bond.
2. Whether the petition and accompanying motions should be denied as moot.

## HOLDINGS

1. Because Castillo had been released from federal custody, he was no longer a pretrial detainee subject to the challenged detention, and his petition no longer presented a live case or controversy under Article III.

## KEY QUOTATIONS

*“Because Petitioner has since been released from custody, Petitioner is no longer a pretrial detainee under 28 U.S.C. § 2241. As a result, his petition for habeas relief from pretrial detention no longer presents a live case or controversy.”* (2)

## FACTUAL BACKGROUND

Castillo was detained in federal custody pending trial in a Southern District of California criminal case and challenged that detention under § 2241. After filing the petition, he filed bond following a Nebbia hearing and was released from federal custody on July 11, 2025.

## PROCEDURAL HISTORY

Castillo filed a § 2241 petition on April 17, 2025, challenging his continued federal pretrial detention in a related criminal case. The government opposed the petition, arguing that Castillo's release on bond mooted the detention challenge. The court found no remaining live case or controversy, denied the petition and accompanying motions as moot, and ordered the matter closed.

## DISPOSITION

dismissed

## CASES CITED

- Boumediene v. Bush, 553 U.S. 723, 737, 745 (2008)
- Wilson v. Terhune, 319 F.3d 477, 479 (9th Cir. 2003)