

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

J.R.M.J. v. Minga Wofford, et al.

Wofford · No. 1:25-cv-1567-DC-SCR · Decided December 8, 2025

SUMMARY

The United States District Court for the Eastern District of California ordered respondents to answer a § 2241 habeas petition filed by an immigration detainee. The order set deadlines for the answer and reply, granted the petitioner’s motion to proceed under a pseudonym, and directed the parties to address whether a prior ruling concerning pre-deprivation hearings constituted law of the case. The court also prohibited transferring the petitioner outside the district pending further order.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	Sean C. Riordan
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	December 8, 2025
DOCKET	1:25-cv-1567-DC-SCR
DISPOSITION	other
PROCEDURAL POSTURE	Petitioner, an immigration detainee proceeding through counsel, filed a petition for a writ of habeas corpus under 28 U.S.C. § 2241. On preliminary review, the court directed respondents to file an answer or return and permitted petitioner to reply.
STANDARD OF REVIEW	Preliminary review under Rule 4 of the Rules Governing Habeas Corpus Cases Under Section 2254, as applied to a § 2241 petition; the court must determine whether the petition warrants an answer or other response.
PRECEDENTIAL VALUE	Unknown; interlocutory procedural order
PARTIES	J.R.M.J. v. Minga Wofford, et al.

TOPICS

- immigration detention
- federal habeas corpus
- procedural due process
- injunctions
- due process

PRACTICE AREAS

immigration

federal habeas corpus

immigration detention

constitutional law

civil procedure

QUESTIONS PRESENTED

1. Whether the petition warranted an answer or return under preliminary habeas review because petitioner may be entitled to relief if the alleged constitutional violation is established.
2. Whether the prior determination that the Due Process Clause does not require a pre-deprivation hearing for a noncitizen re-detained under 8 C.F.R. § 241.4 or § 241.13 is law of the case.
3. Whether petitioner should be permitted to proceed under a pseudonym.
4. Whether transfer of petitioner outside the judicial district should be restricted to preserve the court's jurisdiction over the pending § 2241 petition.

HOLDINGS

1. Because petitioner may be entitled to relief if the alleged constitutional violation is proved, respondents must file an answer or return addressing the petition.
2. Pending further order, respondents may not transfer petitioner to another detention center outside the judicial district because the restriction is necessary to preserve the court's jurisdiction over the pending § 2241 petition.
3. Petitioner's motion to proceed under a pseudonym was granted.

KEY QUOTATIONS

“Because petitioner may be entitled to the requested relief if the claimed violation of constitutional rights is proved, respondents will be directed to show cause why the writ should not be granted” (1)

“In order to ensure this court’s jurisdiction to resolve the pending § 2241 petition, respondent shall not transfer petitioner to another detention center outside of this judicial district, pending further order of the court.” (2)

FACTUAL BACKGROUND

J.R.M.J. is an immigration detainee who filed a § 2241 habeas petition alleging a violation of constitutional rights. The opinion indicates that petitioner had been re-detained under either 8 C.F.R. § 241.4 or § 241.13 and that a prior order denying a temporary restraining order addressed whether the Due Process Clause requires a pre-deprivation hearing. The court required the parties to address whether that prior determination constitutes law of the case.

PROCEDURAL HISTORY

The § 2241 petition was referred to Magistrate Judge Sean C. Riordan on November 26, 2025. The court conducted preliminary review under Rule 4 of the Rules Governing Habeas Corpus Cases Under Section 2254, as applied to the § 2241 petition, and found that petitioner may be entitled to relief if the alleged constitutional

violation is proved. The court also granted petitioner's motion to proceed under a pseudonym and restricted transfer of petitioner outside the district pending further order.

DISPOSITION

other

CASES CITED

- Ctr. for Biological Diversity v. Salazar, 706 F.3d 1085, 1090 (9th Cir. 2013)
- Ranchers Cattlemen Action Legal Fund United Stockgrowers of America v. U.S. Department of Agriculture, 499 F.3d 1108, 1114 (9th Cir. 2007)
- F.T.C. v. Dean Foods Co., 384 U.S. 597, 604 (1966)

OPINION

Wofford
PER CURIAM.

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8 UNITED STATES DISTRICT COURT

9 FOR THE EASTERN DISTRICT OF CALIFORNIA

10 11 J.R.M.J. , No. 1:25-cv-1567-DC-SCR 12 Petitioner, 13 v. ORDER 14 MINGA WOFFORD,
et al., 15 Respondents. 16 17 Petitioner, an immigration detainee who is proceeding through
counsel, filed a petition for 18 a writ of habeas corpus pursuant to 28 U.S.C. § 2241. This matter
was referred to the 19 undersigned on November 26, 2025. ECF No. 10. 20 The court has
conducted a preliminary review of the petition pursuant to Rule 4 of the 21 Rules Governing
Habeas Corpus Cases Under Section 2254.1 Because petitioner may be entitled 22 to the requested
relief if the claimed violation of constitutional rights is proved, respondents will 23 be directed to
show cause why the writ should not be granted by filing an answer/return within 20 24 days from
the date of this order. See 28 U.S.C. § 2243. Petitioner may file a reply/traverse to the 25
answer/return within 14 days after being served a copy of it. 26 27 1 Rule 1(b) of the Rules
Governing Habeas Corpus Cases Under Section 2254 allows a district court to apply any or all of
the rules to other types of habeas corpus petitions including § 2241 28 petitions. 1 In accordance
with the above, IT IS HEREBY ORDERED that: 2 1. Respondents are directed to file an
answer/return within 20 days from the date of this 3 order. If an answer/return is filed, respondents
shall include with the answer/return any and all 4 transcripts or other documents relevant to the
determination of the issues presented in the 5 application. 6 2. Petitioner’s reply/traverse, if any, is
due within 14 days after being served a copy of 7 respondent’s answer/return. 8 3. Among other
issues, the parties should address whether Judge Coggins’ determination 9 in the order denying
petitioner’s motion for a temporary restraining order (ECF No. 10 at 10-11) 10 that when a
noncitizen is re-detained under either 8 C.F.R. § 241.4 or 8 C.F.R. § 241.13 the Due 11 Process

Clause does not impose a pre-deprivation hearing requirement is “law of the case” 12 precluding the undersigned from finding otherwise. See *Ctr. for Biological Diversity v. Salazar*, 13 706 F.3d 1085, 1090 (9th Cir. 2013) (“Generally, ‘decisions at the preliminary injunction phase 14 do not constitute law of the case’ because ‘a preliminary injunction decision is just that: 15 preliminary.’”) (quoting *Ranchers Cattlemen Action Legal Fund United Stockgrowers of America 16 v. U.S. Dep’t of Agr.*, 499 F.3d 1108, 1114 (9th Cir. 2007)); but see *Ranchers Cattlemen*, 499 17 F.3d at 1114 (“A fully considered appellate ruling on an issue of law made on a preliminary 18 injunction appeal ... become[s] the law of the case for further proceedings in the trial court on 19 remand and in any subsequent appeal”). 20 4. Absent a further order of the court, the petition will be taken under submission after the 21 filing of the reply/traverse. 22 5. Petitioner’s motion to proceed under a pseudonym (ECF No. 3) is GRANTED. 23 6. In order to ensure this court’s jurisdiction to resolve the pending § 2241 petition, 24 respondent shall not transfer petitioner to another detention center outside of this judicial district, 25 pending further order of the court. See 28 U.S.C. § 1651(a) (establishing the All Writs Act which 26 empowers the federal courts to “issue all writs necessary or appropriate in aid of their respective 27 jurisdictions....”); see also *F.T.C. v. Dean Foods Co.*, 384 U.S. 597, 604 (1966) (emphasizing that 28 //// 1 | federal courts have the power to “to preserve the court’s jurisdiction or maintain the status quo by 2 || injunction pending review of an agency’s action”). 3 | DATED: December 8, 2025 md

6 SEAN C. RIORDAN

UNITED STATES MAGISTRATE JUDGE

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