

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

John Doe v. Christopher Chestnut, et al.

Doe v. Chestnut · No. 1:25-cv-01372-CDB · Decided November 10, 2025

SUMMARY

The United States District Court for the Eastern District of California grants federal prisoner John Doe’s motion to proceed under a pseudonym in a 28 U.S.C. § 2241 immigration habeas action. The court finds that the petitioner’s privacy interests concerning highly sensitive sexual-assault information outweigh the limited prejudice to respondents and the public interest in disclosure.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	November 10, 2025
DOCKET	1:25-cv-01372-CDB
DISPOSITION	other
PROCEDURAL POSTURE	Petitioner, a federal prisoner detained by Immigration and Customs Enforcement, filed a petition for a writ of habeas corpus under 28 U.S.C. § 2241 and moved to proceed under the pseudonym John Doe. Respondents opposed the motion.
STANDARD OF REVIEW	The Court applied the Ninth Circuit's balancing framework for requests to proceed anonymously, weighing the severity and reasonableness of threatened harm, the petitioner's vulnerability, prejudice to the opposing party, and the public interest.
PRECEDENTIAL VALUE	Unknown

TOPICS

- immigration detention
- federal habeas corpus
- civil procedure
- pleadings

PRACTICE AREAS

- Federal habeas corpus
- immigration detention
- civil procedure

QUESTIONS PRESENTED

1. Whether Petitioner should be permitted to litigate under the pseudonym John Doe when his filings concern highly sensitive personal information and Respondents object.
2. Whether the competing interests of Petitioner, Respondents, and the public favor anonymity at this stage of the habeas proceedings.

HOLDINGS

1. A party may proceed under a pseudonym in the unusual case when nondisclosure of the party's identity is necessary to protect against harassment, injury, ridicule, or personal embarrassment, subject to balancing the need for anonymity against the presumption that party identities are public and any prejudice to the opposing party.

KEY QUOTATIONS

“In this circuit...parties [may] use pseudonyms in the ‘unusual case’ when nondisclosure of the party’s identity ‘is necessary...to protect a person from harassment, injury, ridicule or personal embarrassment.’” (at 2)

“Therefore, the Court will grant Petitioner’s motion to proceed under pseudonym in this action.” (at 4)

FACTUAL BACKGROUND

Petitioner is a federal prisoner detained by ICE in California and brought a § 2241 habeas action concerning circumstances involving sensitive personal information about a sexual assault he experienced in his country of origin. He asserted that public disclosure of his identity could result in stigma, discrimination, ridicule, embarrassment, and other harms. He did not seek to conceal his identity from the Court or Respondents. Respondents identified no concrete prejudice beyond possible confusion associated with increasing numbers of cases involving Doe petitioners.

PROCEDURAL HISTORY

Petitioner initiated this § 2241 habeas action on October 15, 2025, while detained at the California City Detention Facility. He simultaneously moved to proceed under a pseudonym. After the Court ordered a response, Respondents filed an opposition on November 5, 2025. The Court decided the motion on the record without oral argument and granted it.

DISPOSITION

other

CASES CITED

- Does I thru XXIII v. Advanced Textile Corp., 214 F.3d 1058, 1067-69 (9th Cir. 2000)
- United States v. Doe, 655 F.2d 920, 922 n.1 (9th Cir. 1981)
- Doe v. Kamehameha Schools/Bernice Pauahi Bishop Est., 596 F.3d 1036, 1042 (9th Cir. 2010)
- Doe v. Becerra, No. 2:25-CV-00647-DJC-DMC, 2025 WL 691664, at *7 n.5 (E.D. Cal. Mar. 3, 2025)

- Doe v. Bostock, No. C24-0326-JLR-SKV, 2024 WL 1156312, at *2 (W.D. Wash. Mar. 18, 2024)
- Doe v. Andrews, No. 1:25-CV-00506-SAB-HC, 2025 WL 1856591, at *3 (E.D. Cal. June 26, 2025)
- Doe v. Andrews, No. 1:25-CV-00333-JLT-HBK (HC), 2025 WL 1531684 (E.D. Cal. May 28, 2025)
- Doe v. Andrews, No. 1:25-CV-00680-SKO (HC), 2025 WL 1636053, at *1 (E.D. Cal. June 9, 2025)

OPINION

Chestnut

PER CURIAM.

1 2 3 4 5 6 7

8 UNITED STATES DISTRICT COURT

9 EASTERN DISTRICT OF CALIFORNIA

10 11 JOHN DOE, Case No. 1:25-cv-01372-CDB 12 Petitioner, ORDER GRANTING REQUEST
TO

PROCEED UNDER PSEUDONYM AS TO

13 v. PETITIONER JOHN DOE

14 CHRISTOPHER CHESTNUT, et al., (Doc. 2) 15 Respondents. 16 17 Petitioner John Doe
("Petitioner"), a federal prisoner proceeding by counsel, initiated this 18 action by filing a petition
for writ of habeas corpus pursuant to 28 U.S.C. § 2241. (Doc. 1). On

19 October 15, 2025, Petitioner filed the instant petition while in custody of the Immigration and
20 Customs Enforcement ("ICE") at the California City Detention Facility, located in Kern
County, 21 California, which is where he is currently incarcerated. Id. 22 Pending before the
Court¹ is Petitioner's motion to proceed under pseudonym, filed on

23 October 15, 2025. (Doc. 2). The Court directed Respondents to file a response to the motion
and

24 request. (Doc. 4 at 3). On November 5, 2025, Respondents timely filed an opposition to 25
Petitioner's motion to proceed under pseudonym. (Doc. 13). The motion is submitted on the record

26 27 1 On November 4, 2025, this action was reassigned to the undersigned for all further
proceedings following all parties' consent to the jurisdiction of a U.S. magistrate judge pursuant to
28 28 U.S.C. § 636(c)(1). (Doc. 11). 1 and briefs without oral argument. (Doc. 4 at 3) (citing Local

Rule 230(g)). For the reasons set 2 forth below, the Court will grant Petitioner's motion. 3

Petitioner's Motion to Proceed Under Pseudonym 4 A. Parties' Contentions 5 Petitioner requests
the Court to permit him to proceed case under pseudonym to protect his 6 identity from public
disclosure on the grounds that the subject of his habeas petition "reveals the 7 extremely personal
information of the sexual assault he experienced in his country of origin." (Doc. 8 2 at 2).

Petitioner asserts that allowing him to proceed under pseudonym is necessary to preserve 9 his
privacy with respect to highly sensitive information which, if publicized, could result in "stigma,
10 discrimination, ridicule, embarrassment, and other harms." Id. Petitioner further asserts that he

11 does not seek to withhold his identity from Respondents and thereby would cause them no 12

prejudice, and that the threat to public interest here is minimal. Id. Petitioner notes that he has not
13 requested that all court filings be sealed other than his identity, and as such, his request to
proceed 14 pseudonymously “strikes the appropriate balance of preserving his privacy interests
while allowing 15 public access.” Id. at 4. 16 Respondents oppose Petitioner’s request and contend
that he has failed to meet his burden 17 of proving that “this is the unusual case where he will face
bodily harm if his name is disclosed in 18 conjunction with his detention litigation.” (Doc. 13 at
1). Respondents argue that this immigration 19 case is automatically electronically restricted such
that the contents of any pleading are not visible 20 to the public “unless a member of the public
takes the cumbersome step of physically requesting 21 the documents from the clerk’s office.” Id.
at 2. Respondents argue that if the Court disagrees, the 22 government “requests the alternative
remedy of the use of Petitioner’s initials” as the “number of 23 immigration habeas cases has
grown significantly[,] ... and the more cases authorized to proceed 24 under pseudonym, the
higher the risk of confusion, mis-citation to precedent, and mistakes in 25 processing cases[.]” Id.
at 3. 26 B. Governing Authority 27 “[M]any federal courts, including the Ninth Circuit, have
permitted parties to proceed 28 anonymously when special circumstances justify secrecy.” Does I
thru XXIII v. Advanced Textile 1 Corp., 214 F.3d 1058, 1067 (9th Cir. 2000). “In this circuit...
parties [may] use pseudonyms in the 2 ‘unusual case’ when nondisclosure of the party’s identity ‘is
necessary...to protect a person from 3 harassment, injury, ridicule or personal embarrassment.’”
Id. at 1067-68 (quoting United States v. 4 Doe, 655 F.2d 920, 922 n.1 (9th Cir. 1981)). “[A] district
court must balance the need for 5 anonymity against the general presumption that parties’
identities are public information and the 6 risk of unfairness to the opposing party.” Id. at 1068. 7
The Ninth Circuit has identified three situations in which parties have been allowed to 8 proceed
under pseudonyms: “(1) when the identification creates a risk of retaliatory physical or 9 mental
harm; (2) when anonymity is necessary to preserve privacy in a matter of sensitive and 10 highly
personal nature; and (3) when the anonymous party is compelled to admit [his or her] 11 intention
to engage in illegal conduct, thereby risking criminal prosecution...” Id. (citations and 12 internal
quotations marks omitted). In evaluating such a request, courts should consider the 13 following
factors: (1) the severity of the threatened harm; (2) the reasonableness of the anonymous 14 party’s
fears; and (3) the anonymous party’s vulnerability to such retaliation. Id. 15 “The court must also
determine the precise prejudice at each stage of the proceedings to the 16 opposing party, and
whether proceedings may be structured so as to mitigate that prejudice ... [as 17 well as] decide
whether the public’s interest in the case would be best served by requiring that the 18 litigants
reveal their identities.” Id. at 1068-69. “To determine whether to allow a party to proceed 19
anonymously when the opposing party has objected, a district court must balance five factors: ‘(1)
20 the severity of the threatened harm, (2) the reasonableness of the anonymous party’s fears ...
(3) 21 the anonymous party’s vulnerability to such retaliation,’ (4) the prejudice to the opposing
party, 22 and (5) the public interest.’” Doe v. Kamehameha Schools/Bernice Pauahi Bishop Est.,
596 F.3d 23 1036, 1042 (9th Cir. 2010) (quoting Advanced Textile Corp., 214 F.3d at 1068). 24 C.

Analysis 25 The Court has reviewed Petitioner’s motion and finds Petitioner’s representations credible 26 regarding the reasons for proceeding under pseudonym herein. The record in immigration cases 27 such as this is not sealed as set forth in Local Rule 141(a) but, rather, restricted. As Respondents 28 concede, when restricted, documents can still be acquired through public computer terminals in the 1 courthouse. By contrast, sealed documents are accessible only by “the Court and authorized court 2 personnel.” Local Rule 141(a); see *Doe v. Becerra*, No. 2:25-CV-00647-DJC-DMC, 2025 WL 3 691664, at *7 n.5 (E.D. Cal. Mar. 3, 2025) (“[] Respondents erroneously stated that this matter is 4 under seal pursuant to Local Rule 141. This is incorrect. This matter is not under seal and Local

5 Rule 141 does not provide for automatic sealing of immigration actions ... access to civil 6 immigration cases such as this one is restricted, but documents are still viewable by the public via 7 public terminals.”); see also *Doe v. Bostock*, No. C24-0326-JLR-SKV, 2024 WL 1156312, at *2 8 (W.D. Wash. Mar. 18, 2024) (granting immigration detainee’s pseudonym request, noting restricted 9 public access is a consideration against permitting petitioner to proceed anonymously, but finding 10 “any such considerations outweighed” by, inter alia, petitioner’s filings containing sensitive 11 personal matters, her assertions of danger, and her incarceration). 12 Respondents have not identified in their opposition any actual, threatened, or risk of 13 material prejudice that could result from Petitioner’s use of a pseudonym, aside from risks of 14 confusion arising from the increasing number of cases with “Doe” petitioners. However, any such 15 prejudice is minimal, as Respondents may employ other organizational methods, including, for 16 instance, through use of the unique case number associated with this action as an identifier. Lastly, 17 Petitioner provides in his request that he does not seek to withhold his identity from Respondents. 18 See *Doe v. Andrews*, No. 1:25-CV-00506-SAB-HC, 2025 WL 1856591, at *3 (E.D. Cal. June 26, 19 2025) (granting request to proceed under pseudonym where respondents “have not attempted to— 20 and cannot—argue that they would suffer any prejudice if Petitioner were allowed to proceed under 21 pseudonym given Petitioner’s identity is known to the Court and Respondents.”). 22 While the Court is mindful of the public’s interest in knowing the identity of the parties, 23 after reviewing the record and considering the nature of the potential harm, the reasonableness of 24 Petitioner’s fears of keeping the sensitive nature of his sexual assault private, Petitioner’s 25 vulnerability to harassment, ridicule, or personal embarrassment as provided in the petition and 26 request, and any potential prejudice to Respondents as well as the public’s interest in this action, 27 the Court finds that, at this early stage of the litigation, the Petitioner’s need for anonymity 28 outweighs the competing interests. Further, the Court notes that Respondents may challenge 1 | Petitioner’s use of a pseudonym at a later stage of the action. See *Advanced Textile Corp.*, 214 F.3d 2 | at 1067-68 (“In this circuit, we allowed parties to use pseudonyms in the ‘unusual case’ when 3 | nondisclosure of the party’s identity ‘is necessary ... to protect a person from harassment, injury, 4 | ridicule, or personal embarrassment.’”) (citing *United States. v. Doe*, 655 F.2d 920, 922 n.1 (9th 5 | Cir. 1981)); *Doe v. Andrews*, No. 1:25-CV-00333-JLT-HBK (HC),

2025 WL 1531684 (E.D. Cal. 6 | May 28, 2025) (noting that “Courts regularly grant leave to proceed under a pseudonym in cases 7 | related to asylum proceedings,” collecting cases, and granting immigration detainee’s pseudonym 8 | request) (citing 8 C.F.R. § 208.6); see also Doe v. Andrews, No. 1:25-CV-00680-SKO (HC), 2025 9 | WL 1636053, at *1 (E.D. Cal. June 9, 2025) (granting immigration detainee’s pseudonym request, 10 | finding no prejudice to Respondent, and noting “Petitioner ... applied for protection under the 11 | Convention Against Torture. He fears persecution and retaliation from a criminal gang ... he is 12 | aware that individuals in Jamaica look for information about him online. Petitioner’s fears are 13 | credible and satisfy the first three factors”). Therefore, the Court will grant Petitioner’s motion to 14 | proceed under pseudonym in this action. 15 Conclusion and Order 16 Accordingly, it is HEREBY ORDERED: 17 1. Petitioner’s motion to proceed under pseudonym (Doc. 2) is GRANTED. All parties 18 and their counsel shall use the pseudonym “John Doe” in place of Petitioner’s legal 19 name in all future pleadings and papers filed in this action. 20 2. The parties are prohibited from disclosing or publishing the true name of the Petitioner 21 except by order of this Court and as necessary toward the prosecution or defense of the 22 case. 23 | ITIS SO ORDERED. 24 Dated: _ November 7, 2025 | Vv Vv KD KY
25 UNITED STATES MAGISTRATE JUDGE
26 27 28