

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)

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