

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

R.M. v. Warden of the Golden State Annex Detention Facility, et al.

R.M. · No. 1:25-cv-1607 TLN AC P · Decided January 9, 2026

SUMMARY

The United States District Court for the Eastern District of California grants petitioner’s motion to proceed under the pseudonym R.M. and grants related protective relief requiring redaction of petitioner’s full name. The court also grants the motion to seal an eleven-page medical report, subject to pagination and filing requirements under the court’s local rules.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	Allison Claire
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	January 9, 2026
DOCKET	1:25-cv-1607 TLN AC P
DISPOSITION	other
PROCEDURAL POSTURE	Petitioner brought a 28 U.S.C. § 2241 habeas petition and moved to proceed pseudonymously, obtain a protective order, and file a medical report under seal. The motions were unopposed and were decided by order.
STANDARD OF REVIEW	The court applied the Ninth Circuit's three-factor test for pseudonymous proceedings and the compelling-reasons standard for sealing judicial records.
PRECEDENTIAL VALUE	Unpublished district-court order; precedential status is not identified in the source.
PARTIES	R.M. v. Warden of the Golden State Annex Detention Facility, et al.

TOPICS

- federal habeas corpus
- asylum
- immigration
- civil procedure
- equitable relief

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether petitioner should be permitted to proceed under a pseudonym based on the asserted risk of retaliatory harm.
2. Whether a protective order should require the parties to refer to petitioner by initials or as petitioner and redact documents containing petitioner's full name.
3. Whether petitioner demonstrated compelling reasons to seal the medical report.

HOLDINGS

1. The court granted petitioner permission to proceed under the pseudonym R.M. because the asserted risk of retaliatory harm, the circumstances of the asylum case, petitioner's vulnerability, and the absence of prejudice to respondent justified anonymity.
2. The court granted the protective-order request to the extent that the parties must refer to petitioner as petitioner or by initials and redact documents containing petitioner's full name.
3. The court granted petitioner's request to file the medical report under seal.

KEY QUOTATIONS

"Parties are permitted "to 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 1)

"There is "a strong presumption in favor of access to court records.""" (at 2)

"A party seeking to seal a judicial record then bears the burden of overcoming this strong presumption by meeting the 'compelling reasons' standard." (at 2)

FACTUAL BACKGROUND

Petitioner identified themselves as an asylum seeker and asserted a risk of retaliatory harm if their identity were disclosed. Petitioner sought to proceed using initials, required redaction or sealing of identifying information, and sought to file an eleven-page medical report under seal. Respondent did not oppose the motions, and petitioner's identity was already known to respondent.

PROCEDURAL HISTORY

R.M. filed a petition for a writ of habeas corpus under 28 U.S.C. § 2241. The court considered petitioner's motions to proceed under a pseudonym, for a protective order, and to seal a medical report; a pending motion to dismiss was reserved for separate findings and recommendations.

DISPOSITION

other

CASES CITED

- Does I through XXIII v. Advanced Textile Corp., 214 F.3d 1058, 1067-68 (9th Cir. 2000)
- United States v. Doe, 655 F.2d 920, 922 n. 1 (9th Cir. 1981)
- Foltz v. State Farm Mut. Auto. Ins. Co., 331 F.3d 1122, 1135
- Kamakana v. City and County of Honolulu, 447 F.3d 1172, 1178

OPINION

1 2 3 4 5 6 7 8 UNITED STATES DISTRICT COURT 9 FOR THE EASTERN DISTRICT OF
CALIFORNIA 10 11 R.M., No. 1:25-cv-1607 TLN AC P 12 Petitioner, 13 v. ORDER 14
WARDEN OF THE GOLDEN STATE ANNEX DETENTION FACILITY, et al., 15 Respondent.
16 17 Petitioner, proceeding through counsel, has filed a petition for a writ of habeas corpus 18
pursuant to 28 U.S.C. § 2241. Currently before the court are petitioner's motion to proceed 19
pseudonymously and for a protective order and motion to seal a medical report.¹ ECF Nos. 16, 20
17, 19.

Both motions are unopposed. 21 In the motion to proceed pseudonymously, petitioner asserts that
they are an asylum 22 seeker and are requesting to proceed using only their initials due to the risk
of retaliatory harm. 23 ECF No. 16. Parties are permitted “to use pseudonyms in the ‘unusual
case’ when nondisclosure 24 of the party’s identity ‘is necessary... to protect a person from
harassment, injury, ridicule or 25 personal embarrassment.’” Does I through XXIII v. Advanced
Textile Corp., 214 F.3d 1058, 26 1067-68 (9th Cir.

2000) (quoting United States v. Doe, 655 F.2d 920, 922 n. 1 (9th Cir. 1981)). 27 28 1 The pending
motion to dismiss will be addressed by separate findings and recommendations. 1 The need for
anonymity is determined by evaluating (1) “the severity of the threatened harm,” (2) 2 the
reasonableness of the fears, (3) and the individual’s vulnerability to retaliation.

Id. at 1068 3 (citations omitted). 4 The court has reviewed petitioner’s motion and finds that the
reasons for proceeding under 5 a pseudonym warrant granting of the motion, and the need for
confidentiality in asylum cases has 6 been recognized by the government, see 8 C.F.R. § 208.6
(regarding disclosure of records in 7 asylum proceedings).

Moreover, petitioner’s identity has not been withheld from respondent, and 8 having no opposition
from respondent, the undersigned finds that respondent would not suffer 9 any prejudice from
allowing petitioner to be identified by their initials rather than their full name. 10 The motion to
proceed under a pseudonym will therefore be granted. 11 Petitioner also requests a protective
order requiring that the parties either redact or file 12 under seal any information identifying
petitioner; the motion does not identify the scope of the 13 personal information for which
protection is sought.

Considering that this request was made in 14 conjunction with the request to proceed pseudonymously, the court will construe it a request 15 related to the use of petitioner's full name. The request will be granted to the extent that the 16 parties shall be required to refer to petitioner as either "petitioner" or by initials, and they shall 17 redact any documents containing petitioner's full name.

If petitioner wishes to protect any other 18 specific information or have any documents already filed in this action sealed, they may file a 19 motion identifying the type of information they seek to protect or identifying the documents they 20 wish to seal. Such motion must identify the reasons for sealing and specify whether they seek to 21 seal the entire document or only a portion.

In the event petitioner seeks to seal only a portion of a 22 document, they will be required to submit a redacted version for public filing.² 23 Petitioner has also filed a motion to seal a medical report. ECF Nos. 17, 19. There is "a 24 strong presumption in favor of access to court records." *Foltz v. State Farm Mut. Auto. Ins. Co.*, 25 331 F.3d 1122, 1135 (9th Cir.

2003) (citations omitted). "A party seeking to seal a judicial record 26 then bears the burden of overcoming this strong presumption by meeting the 'compelling reasons' 27 2 Due to the nature of this case, access to public filings are restricted to the parties and the public 28 terminals located at the courthouse. See Fed. R. Civ. P. 5.2(c). 1 || standard." *Kamakana v. City and County of Honolulu*, 447 F.3d 1172, 1178 (citation omitted).

2 || The undersigned has reviewed the medical report petitioner wishes to file under seal? and finds 3 || that the sensitive nature of the materials, combined with the concerns of retaliatory harm outlined 4 || more fully in petitioner's motion for a protective order, constitute compelling reasons to seal the 5 || report and the motion will be granted. 6 Accordingly, IT IS HEREBY ORDERED that: 7 1.

Petitioner's motion to proceed pseudonymously and for protective order (ECF No. 16) 8 || is GRANTED to the extent set forth above; 9 2. The parties must redact or move to file under seal any information identifying 10 || petitioner under seal, as outlined above; 11 3.

The Clerk of the Court is directed to update the docket to identify petitioner as 12 | "R.M."; and 13 4. Petitioner's request to file under seal (ECF No. 17, 19) is GRANTED and petitioner 14 || may file his eleven-page medical report under seal.

After adding consecutive pagination to the 15 || medical report, petitioner shall submit the report to the Clerk of the Court for filing in accordance 16 || with Local Rule 141(e)(2)(). 17 | DATED: January 8, 2026 ~ Ig Chthion— Chore ALLISON CLAIRE 19 UNITED STATES MAGISTRATE JUDGE 20 21 22 23 24 25 26 27 Q_—_ xj dd > The court notes that the report is not paginated consecutively as required by Local Rule 141(b).

28 | Petitioner will be required add such pagination prior to submitting the report for filing.

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