

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PRECEDENTIAL VALUE	Unpublished district-court order; precedential status is not identified in the source.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

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