

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Doe v. Andrews

No. 1:25-cv-00755-CDB, 2025 WL [unavailable] (E.D. Cal. Aug. 18, 2025) · No. 1:25-cv-00755-CDB ·
Decided August 18, 2025

SUMMARY

The United States District Court for the Eastern District of California grants federal habeas petitioner John Doe’s request to proceed under a pseudonym. The court grants in part and denies in part the request to seal the petition and supporting exhibits, ordering certain immigration, medical, and other sensitive materials sealed while requiring redaction or denying sealing for other exhibits. The order establishes five-day and fourteen-day compliance deadlines.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	Christopher D. Baker
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	August 18, 2025
DOCKET	1:25-cv-00755-CDB
DISPOSITION	other
PROCEDURAL POSTURE	Petitioner, a federal prisoner proceeding under 28 U.S.C. § 2241, moved to proceed under a pseudonym and sought to seal the petition and supporting exhibits. Respondents opposed both requests.
STANDARD OF REVIEW	The Court applied the Ninth Circuit’s balancing test for pseudonym requests, weighing threatened harm, the reasonableness of the petitioner’s fears, vulnerability to retaliation, prejudice to the opposing party, and the public interest. For sealing, the Court applied the First Amendment right of access and required a compelling interest, a substantial probability of harm absent closure, and the absence of adequate alternatives such as redaction.
PRECEDENTIAL VALUE	Unpublished, nonprecedential district-court order
PARTIES	John Doe v. Tonya Andrews, et al.

TOPICS

federal habeas corpus

immigration detention

asylum

civil procedure

PRACTICE AREAS

federal habeas corpus

immigration detention

sealing of court records

pseudonymous litigation

QUESTIONS PRESENTED

1. Whether Petitioner should be permitted to proceed under a pseudonym despite Respondents' opposition and Petitioner's prior use of his true name in other proceedings.
2. Whether the petition, motion to proceed under a pseudonym, and supporting exhibits should be filed or maintained under seal.
3. Whether the Court should permit wholesale sealing of future filings concerning the underlying facts and claims.
4. Whether specific exhibits should be sealed in full or instead redacted to preserve public access.

HOLDINGS

1. Petitioner may proceed under the pseudonym John Doe because the need for anonymity, based on credible assertions of physical harm and retaliation, outweighs the prejudice to Respondents and the public's interest in disclosure at this stage of the litigation.
2. The unredacted petition and motion to proceed under a pseudonym may be filed under seal because disclosure would harm compelling privacy and safety interests and no adequate alternative to sealing was available.
3. Petitioner may not prospectively seal all future documents concerning the underlying facts and claims; future sealing requests must identify a compelling interest and explain why redaction or another alternative is inadequate.
4. The Court granted sealing for Exhibits C, E, F, G, H, I, J, P, and Q; denied sealing for Exhibits A, B, D, N, K, L, M, and O; and required proposed redacted copies or a detailed justification for sealing in toto as to Exhibits A, B, D, and N.

KEY QUOTATIONS

“To determine whether to allow a party to proceed anonymously when the opposing party has objected, a district court must balance five factors: ‘(1) the severity of the threatened harm, (2) the reasonableness of the anonymous party’s fears ... (3) the anonymous party’s vulnerability to such retaliation,’ (4) the prejudice to the opposing party, and (5) the public interest.” (at 3)

“As a general rule, the public is permitted ‘access to litigation documents and information produced during discovery.’” (at 6)

“Unless a particular court record is one ‘traditionally kept secret,’ a ‘strong presumption in favor of access’ is the starting point.” (at 6)

“All parties and their counsel shall use the pseudonym “John Doe” in place of Petitioner’s legal name in all future pleadings and papers filed in this action.” (at 10)

FACTUAL BACKGROUND

John Doe is a federal prisoner and immigration detainee pursuing a § 2241 habeas petition concerning his detention. He asserted that disclosure of his identity would expose him to physical harm and retaliation and submitted declarations and exhibits concerning his asylum-related immigration proceedings, medical information, and conditions at Golden State Annex. Respondents argued that Doe had previously litigated under his true name and that the action's restricted access reduced any need for anonymity.

PROCEDURAL HISTORY

Petitioner initiated this habeas action on June 19, 2025, and filed the pseudonym motion and sealing request. After the Court ordered a response, Respondents opposed both requests on July 17, 2025. The Court granted leave to proceed under the pseudonym John Doe, granted sealing as to specified documents and exhibits, denied sealing as to other exhibits, and ordered proposed redactions or further justification for certain exhibits.

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)
- Hinckley v. All Am. Waste Servs. Inc., No. CV-25-00927-PHX-SHD, 2025 WL 1940001, at *5 (D. Ariz. July 15, 2025)
- Doe v. Andrews, No. 1:25-CV-00506-SAB-HC, 2025 WL 1856591, at *3-4 (E.D. Cal. June 26, 2025)
- 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)
- Press-Enterprise Co. v. Superior Court, 464 U.S. 501, 510 (1985)
- Ctr. for Auto Safety v. Chrysler Group, LLC, 809 F.3d 1092, 1096 (9th Cir. 2016)
- Olympic Ref. Co. v. Carter, 332 F.2d 260, 264 (9th Cir. 1964)
- In re Roman Catholic Archbishop of Portland in Oregon, 661 F.3d 417, 424 (9th Cir. 2011)
- Phillips v. Gen. Motors Corp., 307 F.3d 1206, 1210 (9th Cir. 2002)
- San Jose Mercury News, Inc. v. U.S. Dist. Ct., 187 F.3d 1096, 1103 (9th Cir. 1999)
- Kamakana v. Cty. & Cnty. of Honolulu, 447 F.3d 1172, 1179 (9th Cir. 2006)
- Foltz v. State Farm Mut. Auto. Ins. Co., 331 F.3d 1122, 1135 (9th Cir. 2003)
- Oregonian Publishing Co. v. U.S. Dist. Court for Dist. of Or., 920 F.2d 1462, 1466 (9th Cir. 1990)
- K.U. v. Freden, No. 25-cv-361-LJV, 2025 WL 1473974, at *5 (W.D.N.Y. May 21, 2025)

- Kharis v. Sessions, No. 18-CV-04800-JST, 2018 WL 5809432, at *3 (N.D. Cal. Nov. 6, 2018)
- Doe v. Barr, No. 20-CV-02917-JSC, 2020 WL 2733928, at *1 (N.D. Cal. May 26, 2020)
- Al Otro Lado, Inc. v. Wolf, No. 3:17-cv-02366-BAS-KSC, 2020 WL 4432026, at *5 (S.D. Cal. July 31, 2020)
- Unknown Parties v. Johnson, No. CV-15-00250-TUC-DCB, 2016 WL 8199309, at *4 (D. Ariz. June 27, 2016)
- 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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