

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
WASHINGTON

Mubashar Hassan v. Pamela Bondi, et al.

Hassan · No. C25-2559-JHC-MLP · Decided December 15, 2025

SUMMARY

The United States District Court for the Western District of Washington grants Mubashar Hassan’s motion for appointment of counsel in a federal habeas action under 28 U.S.C. § 2241. The court finds that the case may involve issues governed by *Zadvydas v. Davis* and that the complexity of the issues and the interests of justice warrant appointed counsel. The Federal Public Defender is appointed to represent Hassan.

CASE DETAILS

COURT	United States District Court for the Western District of Washington
WRITING FOR THE COURT	Michelle L. Peterson
JURISDICTION	United States District Court for the Western District of Washington
DECIDED	December 15, 2025
DOCKET	C25-2559-JHC-MLP
DISPOSITION	other
PROCEDURAL POSTURE	Petitioner filed a federal habeas action under 28 U.S.C. § 2241, along with a proposed habeas petition, an application to proceed in forma pauperis, and a motion for appointment of counsel.
STANDARD OF REVIEW	The court considered whether appointment of counsel was warranted under 18 U.S.C. § 3006A(a)(2)(B), including the complexity of the issues, the interests of justice, and Petitioner’s demonstrated financial eligibility.
PRECEDENTIAL VALUE	Unpublished district court order with no reporter citation; generally nonprecedential.

TOPICS

- federal habeas corpus
- immigration detention
- civil procedure

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether counsel should be appointed for Petitioner in this § 2241 habeas action because the case involves complex issues, the interests of justice require representation, and Petitioner is financially eligible.

HOLDINGS

1. Appointment of counsel was warranted because the petition presented complex issues potentially governed by *Zadvydas v. Davis*, the interests of justice required counsel, and Petitioner demonstrated the financial eligibility required by statute.

KEY QUOTATIONS

“Because of the complex issues involved in this case, the interests of justice require that counsel be appointed for Petitioner.” (at 1-2)

FACTUAL BACKGROUND

Mubashar Hassan filed a federal habeas action under 28 U.S.C. § 2241. His petition indicated that the case potentially fell within the class of cases governed by *Zadvydas v. Davis*, involving complex issues concerning detention. Hassan also submitted an in forma pauperis application demonstrating financial eligibility for appointed counsel.

PROCEDURAL HISTORY

The Federal Public Defender's Office filed the proposed petition and related motions on behalf of Mubashar Hassan. The district court considered the motion for appointment of counsel, Petitioner's financial eligibility, and the record, then granted the motion and appointed the Federal Public Defender to represent Petitioner.

DISPOSITION

other

CASES CITED

- *Zadvydas v. Davis*, 533 U.S. 678 (2001)

OPINION

1 2 3 4 5 UNITED STATES DISTRICT COURT 6 WESTERN DISTRICT OF WASHINGTON
AT SEATTLE 7 8 MUBASHAR HASSAN, 9 Petitioner, Case No. C25-2559-JHC-MLP 10 v.
ORDER APPOINTING COUNSEL 11 PAMELA BONDI, et al., 12 Respondents. 13 14 This is a
federal habeas action filed under 28 U.S.C. § 2241.

The Federal Public 15 Defender's Office, on behalf of Petitioner Mubashar Hassan, has filed a proposed petition for 16 writ of habeas corpus, an application to proceed in forma pauperis ("IFP"), and a motion seeking 17 appointment of counsel in this matter.¹ (Dkt. ## 1-3.)

The Court, having considered Petitioner's 18 motion, his financial eligibility, and the balance of the record, finds and ORDERS as follows: 19 (1) The petition indicates that this case falls within the class of cases potentially 20 governed by *Zadvydas v. Davis*, 533 U.S. 678 (2001). (See dkt. # 1.)

Because of the complex 21 issues involved in this case, the interests of justice require that counsel be appointed for 22 Petitioner. See 18 U.S.C. § 3006A(a)(2)(B). As required by statute, Petitioner has demonstrated, 23 1 Petitioner's application to proceed IFP will be addressed by separate order. 1 by means of his IFP application, financial eligibility for such appointment.

(See dkt. # 1.) 2 Accordingly, Petitioner's request for appointment of counsel (dkt. # 3) is GRANTED. The Court 3 appoints the Federal Public Defender to represent Petitioner in these proceedings. 4 (2) The Clerk is directed to send copies of this order to Petitioner, to the Federal 5 Public Defender, to counsel for Respondent, and to the Honorable John H. Chun.

6 Dated this 15th day of December, 2025. 7 A 8 MICHELLE L. PETERSON United States Magistrate Judge 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23