

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Sukhchain S. v. Warden of the Golden State Annex Detention
Facility, et al.

Sukhchain S. · No. 1:25-cv-01863-TLN-DMC · Decided December 16, 2025

SUMMARY

The United States District Court for the Eastern District of California construed a pro se immigration detainee’s 28 U.S.C. § 2241 habeas petition as a motion for a temporary restraining order. The court barred respondents from transferring the petitioner outside the district pending further order, set briefing deadlines, granted in forma pauperis status, and appointed counsel. The court also directed the clerk to protect the petitioner’s identity by using his first name and last initial.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	Troy L. Nunley
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	December 16, 2025
DOCKET	1:25-cv-01863-TLN-DMC
DISPOSITION	other
PROCEDURAL POSTURE	An immigration detainee proceeding pro se filed a petition for a writ of habeas corpus under 28 U.S.C. § 2241. The court construed the pleading and requested relief as a motion for a temporary restraining order, granted in forma pauperis status and appointed counsel, and temporarily prohibited transfer of the petitioner outside the district while requiring respondents to respond.
PRECEDENTIAL VALUE	Unknown; district court order with no reporter citation.
PARTIES	Sukhchain S. v. Warden of the Golden State Annex Detention Facility, et al.

TOPICS

- immigration detention
- federal habeas corpus
- injunctions
- remedies
- civil procedure

PRACTICE AREAS

immigration detention

federal habeas corpus

civil procedure

injunctions

QUESTIONS PRESENTED

1. Whether the substance of petitioner's pro se § 2241 pleading and requested relief should be construed as a motion for a temporary restraining order.
2. Whether petitioner should be temporarily protected from transfer outside the Eastern District of California while the court considers the requested injunctive relief.
3. Whether petitioner should be granted in forma pauperis status and appointed counsel.

HOLDINGS

1. The court construed petitioner's § 2241 pleading as a motion for a temporary restraining order because the substance of the pleading and the relief requested were injunctive.
2. Pending further order, respondents may not transfer petitioner to another detention center outside the Eastern District of California.
3. Petitioner's motion to proceed in forma pauperis was granted.
4. The court granted petitioner's motion for appointment of counsel because the complexity of the legal issues made appointment in the interests of justice.

KEY QUOTATIONS

“acknowledging the Court’s “express authority under the All Writs Act to issue such temporary injunctions as may be necessary to protect its own jurisdiction”” (at 1)

FACTUAL BACKGROUND

Sukhchain S. is an immigration detainee held at the Golden State Annex Detention Facility and represented himself in filing a § 2241 petition. The petition sought relief that the court determined was injunctive in substance, including protection against transfer outside the district. The court also found the legal issues sufficiently complex that appointment of counsel was in the interests of justice.

PROCEDURAL HISTORY

Petitioner filed a § 2241 habeas petition, an application to proceed in forma pauperis, and a motion for appointment of counsel. The district court construed the substance of the habeas pleading as a motion for a temporary restraining order, directed respondents to oppose the requested injunctive relief, temporarily barred transfer of petitioner outside the district, granted pauper status, and appointed counsel.

DISPOSITION

other

CASES CITED

- Estelle v. Gamble, 429 U.S. 97, 106 (1976)
- F.T.C. v. Dean Foods Co., 384 U.S. 597, 608 (1966)
- Weygandt v. Look, 718 F.2d 952, 954 (9th Cir. 1983)

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