

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)

OPINION

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

PER CURIAM.

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7 UNITED STATES DISTRICT COURT

8 EASTERN DISTRICT OF CALIFORNIA

9

10 SUKHCHAIN S., No. 1:25-cv-01863-TLN-DMC

11 Petitioner, 12 v. ORDER

13 WARDEN OF THE GOLDEN STATE

ANNEX DETENTION FACILITY, et al., 14 Respondents. 15 16 Petitioner Sukhchain S.1
("Petitioner"), an immigration detainee who is representing 17 himself, filed a petition for a writ
of habeas corpus pursuant to 28 U.S.C. § 2241. Based on the 18 substance of Petitioner's petition
and the relief requested therein, the Court construes Petitioner's 19 pleading as a motion for a
temporary restraining order. Estelle v. Gamble, 429 U.S. 97, 106 20

(1976) (stating that pleadings by pro se litigants must be held to less stringent standards than
21 formal pleadings drafted by lawyers.) 22 Respondents shall file any opposition to Petitioner's
Motion for Temporary Restraining 23 24 1 As recommended by the Committee on Court
Administration and Case Management of 25 the Judicial Conference of the United States, the
Court omits petitioner's full name, using only his first name and last initial, to protect sensitive
personal information. See Memorandum re: Privacy 26 Concern Regarding Social Security and
Immigration Opinions, Committee on Court Administration and Case Management, Judicial
Conference of the United States (May 1, 2018), 27 https://www.uscourts.gov/sites/default/files/18-cv-l-suggestion_cacm_0.pdf. The Clerk of Court is directed to update the docket to reflect this
change accordingly. 28 1 Order by noon on December 19, 2025. Any opposition shall provide the
Court with copies of all 2 referenced/relevant portions of Petitioner's A-File and any and all
available records related to 3 Petitioner's allegations. Petitioner may file a reply by December 23,
2025. 4 Pending the Court's ruling on Petitioner's motion, Respondents shall not take any action 5
to transfer Petitioner out of this District. See F.T.C. v. Dean Foods Co., 384 U.S. 597, 608 (1966) 6
(acknowledging the Court's "express authority under the All Writs Act to issue such temporary 7
injunctions as may be necessary to protect its own jurisdiction"). 8 Petitioner filed a motion to
proceed in forma pauperis (ECF No. 2), which is granted. See 9 28 U.S.C. § 1914. Petitioner has
also filed a motion for the appointment of counsel. (ECF No. 10 3.) In light of the complexity of

the legal issues involved, the Court has determined that the 11 interests of justice require the appointment of counsel for Petitioner. See 18 U.S.C. § 12 3006A(a)(2)(B); see also *Weygandt v. Look*, 718 F.2d 952, 954 (9th Cir. 1983). Within seven 13 days from the date of this Order, the appointing authority for the Eastern District of California 14 shall identify counsel and send counsel's contact information to Michele Krueger, Courtroom 15 Deputy for Chief Judge Troy Nunley, via email at mkrueger@caed.uscourts.gov, who shall 16 update the docket to reflect counsel's appointment. If counsel is not a member of the Eastern 17 District of California Criminal Justice Act ("CJA") Panel, the Court hereby authorizes them to 18 serve as CJA counsel for petitioner for the duration of the proceedings in this Court pursuant to 19 Local Rule 180(b)(1). 20 In accordance with the above, IT IS HEREBY ORDERED that: 21 1. Respondents shall file any opposition to Petitioner's request for injunctive relief by 22 noon on December 19, 2025; Petitioner may file a reply, if any, by December 23, 23 2025; 24 2. In order to ensure this Court's jurisdiction to resolve the pending § 2241 petition, 25 Respondent shall not transfer Petitioner to another detention center outside of this 26 judicial district, pending further order of the Court. 27 3. Petitioner's motion to proceed in forma pauperis (ECF No. 2) is granted; 28 4. Petitioner's motion to appoint counsel (ECF No. 3) is granted; Within seven days from 1 the date of this order, the appointing authority for the Eastern District of California 2 shall identify counsel and send counsel's contact information to Michele Krueger, 3 Courtroom Deputy for Chief Judge Troy Nunley, who shall update the docket to 4 reflect counsel's appointment; 5 5. The Clerk of the Court shall serve a copy of this order on the Federal Defender, 6 Attention: Habeas Appointment, along with a copy of the § 2241 petition; 7 6. The Clerk of the Court shall serve a copy of this order together with a copy of 8 Petitioner's application for a writ of habeas corpus pursuant to 28 U.S.C. § 2241 on 9 the United States Attorney; and 10 7. The Clerk of Court is directed to update the docket to only list Petitioner's first name 11 and last initial. 12 IT IS SO ORDERED. 13 ||

Date: December 16, 2025 14 Lael bly

16 TROY L. NUNLEY

7 CHIEF UNITED STATES DISTRICT JUDGE

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