

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Koroma v. Garland

No. 1:25-cv-00046-SKO (HC) (E.D. Cal. May 5, 2025) · No. 1:25-cv-00046-SKO (HC) · Decided May 5, 2025

SUMMARY

The court recommends granting the respondent’s motion to dismiss a 28 U.S.C. § 2241 habeas petition as moot. The petitioner, an immigration detainee, was removed to Sierra Leone while the case was pending and was therefore no longer in custody. The document also directs the clerk to assign a district judge and provides a 21-day deadline for objections.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	Sheila K. Oberto
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	May 5, 2025
DOCKET	1:25-cv-00046-SKO (HC)
DISPOSITION	dismissed
PROCEDURAL POSTURE	Petitioner sought habeas relief under 28 U.S.C. § 2241 concerning his immigration detention. After petitioner was removed from the United States, respondents moved to dismiss on mootness grounds. The magistrate judge recommended granting the motion and dismissing the petition as moot, subject to objections and review by an assigned district judge.
STANDARD OF REVIEW	Article III mootness and case-or-controversy jurisdiction
PRECEDENTIAL VALUE	nonprecedential
PARTIES	Ibrahim Labor Koroma v. U.S. Attorney General, et al.

TOPICS

- immigration detention
- federal habeas corpus
- subject matter jurisdiction
- removal proceedings
- civil procedure

PRACTICE AREAS

immigration

federal habeas corpus

civil procedure

constitutional law

QUESTIONS PRESENTED

1. Whether Koroma's § 2241 petition challenging his indefinite immigration detention became moot after he was removed from the United States.

HOLDINGS

1. A habeas petition challenging indefinite immigration detention is moot when the petitioner is no longer in custody and lacks a legally cognizable interest in the outcome.

KEY QUOTATIONS

“As Petitioner is no longer in custody, his petition claiming indefinite detention is now moot.” (at 2)

FACTUAL BACKGROUND

Koroma, a native and citizen of Sierra Leone, was detained by ICE at the Golden State Annex in McFarland, California. His order of removal became final on May 21, 2024, and he was detained continuously from May 11, 2023, until his removal. He was removed to Sierra Leone on March 5, 2025, after being unsuccessful in obtaining relief from removal.

PROCEDURAL HISTORY

Koroma filed a § 2241 habeas petition on January 10, 2025, while detained by immigration authorities. Respondents moved to dismiss, and later advised the court that Koroma had been removed to Sierra Leone on March 5, 2025. Because Koroma was no longer in custody, the magistrate judge concluded that his challenge to indefinite detention was moot and issued findings and a recommendation to dismiss.

DISPOSITION

dismissed

CASES CITED

- Iron Arrow Honor Soc'y v. Heckler, 464 U.S. 67, 70 (1983)
- NAACP, Western Region v. City of Richmond, 743 F.2d 1346, 1352 (9th Cir. 1984)
- Murphy v. Hunt, 455 U.S. 478, 481 (1982)
- North Carolina v. Rice, 404 U.S. 244, 246 (1971) (per curiam)
- Aetna Life Ins. Co. v. Hayworth, 300 U.S. 227, 240-241 (1937)
- Wilkerson v. Wheeler, 772 F.3d 834, 838-39 (9th Cir. 2014)

OPINION

(HC) Koroma v. Garland

PER CURIAM.

1 2 3 4 5

6 UNITED STATES DISTRICT COURT

7 EASTERN DISTRICT OF CALIFORNIA

8 9 10 11 IBRAHIM LABOR KOROMA,) Case No.: 1:25-cv-00046-SKO (HC)) 12 Petitioner,)

ORDER DIRECTING CLERK OF COURT TO

) ASSIGN DISTRICT JUDGE

13)

) FINDINGS AND RECOMMENDATION TO

14 v.

) GRANT MOTION TO DISMISS

15) [Doc. 6])

16 U.S. ATTORNEY GENERAL,) [21-DAY OBJECTION DEADLINE]

et al.,) 17) Respondents.) 18) 19 20 Petitioner is a former immigration detainee proceeding pro se and in forma pauperis with a 21 petition for writ of habeas corpus pursuant to 28 U.S.C. § 2241. 22 Petitioner filed the instant petition on January 10, 2025. (Doc. 1.) On February 26, 2025, 23 Respondent filed a motion to dismiss the petition. (Doc. 6.) On March 10, 2025, Respondent filed a 24 supplement advising the Court that Petitioner had been removed from the United States. (Doc. 7.) 25 Petitioner did not file an opposition. 26 The Court finds that the petition is now moot. Accordingly, the Court will recommend the 27 motion to dismiss be GRANTED as the petition is now moot. 28 /////

1 BACKGROUND

2 Petitioner is a native and citizen of Sierra Leone. (Doc. 1 at 3.) Petitioner was detained at the 3 Golden State Annex in McFarland, California, at the time the petition was filed. (Doc. 1 at 3.) On 4 May 21, 2024, an order of removal from the United States became final. (Doc. 1 at 3.) He was taken

5 into ICE custody on May 11, 2023, and was detained continuously by ICE until his recent removal. 6 (Doc. 1 at 3.) Petitioner was unsuccessful in his applications for relief from removal. (Doc. 6-1 at 2.) 7 On March 5, 2025, Petitioner was removed to Sierra Leone. (Doc. 7-1 at 2.)

8 DISCUSSION

9 The case or controversy requirement of Article III of the Federal Constitution deprives the 10 Court of jurisdiction to hear moot cases. *Iron Arrow Honor Soc’y v. Heckler*, 464 U.S. 67, 70 (1983); 11 *NAACP, Western Region v. City of Richmond*, 743 F.2d 1346, 1352 (9th Cir. 1984). A case 12 becomes moot if the “the issues presented are no longer ‘live’ or the parties lack a legally cognizable 13 interest in the outcome.” *Murphy v. Hunt*, 455 U.S. 478, 481 (1984). The Federal Court is “without 14 power to decide questions that cannot affect the rights of the litigants before them.” *North Carolina v. 15 Rice*, 404 U.S. 244, 246 (1971) (per curiam) (quoting *Aetna Life Ins. Co. v. Hayworth*, 300 U.S. 227, 16 240-241 (1937)). As Petitioner is no longer in custody, his petition claiming indefinite detention is 17 now moot.

18 ORDER

19 The Clerk of Court is directed to assign a district judge to this case.

20 RECOMMENDATION

21 For the foregoing reasons, the Court HEREBY RECOMMENDS that Respondent's motion to
22 dismiss be GRANTED and the petition be DISMISSED as moot. 23 This Findings and
Recommendation is submitted to the United States District Court Judge 24 assigned to the case,
pursuant to the provisions of 28 U.S.C. § 636 (b)(1)(B) and Rule 304 of the Local 25 Rules of
Practice for the United States District Court, Eastern District of California. Within twenty- 26 one
(21) days after being served with a copy of this Findings and Recommendation, a party may file
27 written objections with the Court and serve a copy on all parties. Id. The document should be
28 captioned, "Objections to Magistrate Judge's Findings and Recommendation" and shall not
exceed 15 fifteen (15) pages, except by leave of court with good cause shown. The Court will not
consider 2 exhibits attached to the Objections. To the extent a party wishes to refer to any
exhibit(s), the party 3 should reference the exhibit in the record by its CM/ECF document and
page number, when possible, 4 or otherwise reference the exhibit with specificity. Any pages filed
in excess of the fifteen (15) page 5 limitation may be disregarded by the District Judge when
reviewing these Findings and 6 Recommendations pursuant to 28 U.S.C. § 636 (b)(1)(C). The
parties are advised that failure to file 7 objections within the specified time may result in the
waiver of rights on appeal. *Wilkerson v. 8 Wheeler*, 772 F.3d 834, 838-39 (9th Cir. 2014). This
recommendation is not an order that is 9 immediately appealable to the Ninth Circuit Court of
Appeals. Any notice of appeal pursuant to Rule 10 4(a)(1), Federal Rules of Appellate Procedure,
should not be filed until entry of the District Court's 11 judgment. 12 13 IT IS SO ORDERED. 14
Dated: May 5, 2025 /s/ Sheila K. Oberto .

15 UNITED STATES MAGISTRATE JUDGE

16 17 18 19 20 21 22 23 24 25 26 27 28