

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PRECEDENTIAL VALUE	nonprecedential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

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)