

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

E.A.P.C. v. Minga Wofford, et al.

E.A.P.C. · No. 1:25-cv-01546-JLT-CDB · Decided December 11, 2025

SUMMARY

The United States District Court for the Eastern District of California granted Petitioner E.A.P.C.’s unopposed motion to proceed under a pseudonym in a habeas action brought under 28 U.S.C. § 2241. The court ordered the parties and counsel to use “E.A.P.C.” in future filings and prohibited disclosure of the petitioner’s true name except as authorized by the court or necessary to litigate the case.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	December 11, 2025
DOCKET	1:25-cv-01546-JLT-CDB
DISPOSITION	other
PROCEDURAL POSTURE	Petitioner, a federal detainee proceeding under 28 U.S.C. § 2241, moved unopposed to proceed under a pseudonym. The district court decided the motion on the briefs without oral argument.
STANDARD OF REVIEW	The court applied the Ninth Circuit's balancing framework for requests to proceed under a pseudonym, weighing the threatened harm, reasonableness of the fears, vulnerability to retaliation, prejudice to the opposing party, and the public interest.
PRECEDENTIAL VALUE	unpublished district court order
PARTIES	E.A.P.C. v. Minga Wofford, et al.

TOPICS

- immigration detention
- federal habeas corpus
- civil procedure

PRACTICE AREAS

- civil procedure
- immigration
- habeas corpus

QUESTIONS PRESENTED

1. Whether Petitioner should be permitted to proceed under a pseudonym to protect against potential harassment, retaliation, stigma, and disclosure of sensitive personal health information.
2. Whether the need for anonymity outweighed the presumption that litigants' identities are public information, any prejudice to Respondents, and the public interest.

HOLDINGS

1. A district court may permit a party to proceed under a pseudonym when special circumstances justify secrecy and nondisclosure is necessary to protect the person from harassment, injury, ridicule, or personal embarrassment.
2. Petitioner was entitled to proceed under the pseudonym E.A.P.C. because the potential harm and reasonable fears concerning sensitive mental and physical health information, together with the lack of prejudice to Respondents and the public interest at this stage, outweighed the competing interests in disclosure.

KEY QUOTATIONS

“The court must also determine the precise prejudice at each stage of the proceedings to the opposing party, and whether proceedings may be structured so as to mitigate that prejudice” (at 2)

“the Petitioner’s need for anonymity outweighs the competing interests” (at 3)

“All parties and their counsel shall use the pseudonym “E.A.P.C.” in place of Petitioner’s legal name in all future pleadings and papers filed in this action” (at 4)

FACTUAL BACKGROUND

E.A.P.C. is a federal detainee held by Immigration and Customs Enforcement at the Mesa Verde ICE Processing Center in Bakersfield, California. He asserted that the habeas litigation could require disclosure of sensitive mental and physical health information and that public disclosure of his identity could expose him and his family to harassment, retaliation, stigma, or other harm; he offered to disclose his identity to government counsel.

PROCEDURAL HISTORY

Petitioner initiated a § 2241 habeas action, together with a request for emergency injunctive relief and a motion to proceed via pseudonym, on November 12, 2025. Respondents did not oppose the pseudonym motion, and the court granted it, directing the parties to use E.A.P.C. in future filings and prohibiting disclosure of Petitioner's true name except by court order or as necessary to litigate the case.

DISPOSITION

other

CASES CITED

- Does I thru XXIII v. Advanced Textile Corp., 214 F.3d 1058, 1067-69 (9th Cir. 2000)
- United States v. Doe, 655 F.2d 920, 922 n.1 (9th Cir. 1981)
- Doe v. Kamehameha Schools/Bernice Pauahi Bishop Est., 596 F.3d 1036, 1042 (9th Cir. 2010)
- Doe v. Andrews, No. 1:25-CV-00506-SAB-HC, 2025 WL 1856591, at *3 (E.D. Cal. June 26, 2025)
- Doe v. Andrews, No. 1:25-CV-00333-JLT-HBK (HC), 2025 WL 1531684 (E.D. Cal. May 28, 2025)
- Doe v. Andrews, No. 1:25-CV-00680-SKO (HC), 2025 WL 1636053, at *1 (E.D. Cal. June 9, 2025)

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