

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
WASHINGTON

Than Dinh Le v. Pamela Bondi, et al.

Le · No. C25-2454-KKE · Decided December 8, 2025

SUMMARY

The United States District Court for the Western District of Washington grants Than Dinh Le’s motion for appointment of counsel in his federal habeas action under 28 U.S.C. § 2241. The court finds that the case may implicate *Zadvydas v. Davis*, that the issues are complex, and that Le is financially eligible for appointed counsel.

CASE DETAILS

COURT	United States District Court for the Western District of Washington
WRITING FOR THE COURT	Kymberly K. Evanson
JURISDICTION	United States District Court for the Western District of Washington
DECIDED	December 8, 2025
DOCKET	C25-2454-KKE
DISPOSITION	other
PROCEDURAL POSTURE	Petitioner filed a federal habeas action under 28 U.S.C. § 2241 and moved for appointment of counsel.
STANDARD OF REVIEW	Appointment of counsel is appropriate when the interests of justice require it and the petitioner is financially eligible under 18 U.S.C. § 3006A(a)(2)(B).
PRECEDENTIAL VALUE	Unpublished district court order; nonprecedential
PARTIES	Than Dinh Le v. Pamela Bondi, et al.

TOPICS

- federal habeas corpus
- immigration detention
- immigration

PRACTICE AREAS

- Federal habeas corpus
- Immigration detention
- Appointment of counsel

QUESTIONS PRESENTED

1. Whether counsel should be appointed for a financially eligible petitioner in a § 2241 habeas action involving potentially complex issues concerning detention.

HOLDINGS

1. The court granted Petitioner's request for appointment of counsel because the case potentially involved complex issues governed by *Zadvydas v. Davis*, the interests of justice required representation, and Petitioner demonstrated financial eligibility.

KEY QUOTATIONS

“Because of the complex issues involved in this case, the interests of justice require that counsel be appointed for Petitioner.” (1)

FACTUAL BACKGROUND

Petitioner Than Dinh Le filed a federal habeas action under 28 U.S.C. § 2241 and sought appointment of counsel. The court determined that the petition potentially implicated the complex issues addressed in *Zadvydas v. Davis* and found that the interests of justice required counsel; the court also found that Le had demonstrated financial eligibility.

PROCEDURAL HISTORY

Than Dinh Le commenced a § 2241 federal habeas action and requested appointed counsel. The district court considered the motion, Petitioner's financial eligibility, and the record, and granted the request, appointing the Federal Public Defender.

DISPOSITION

other

CASES CITED

- *Zadvydas v. Davis*, 533 U.S. 678 (2001)