

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
LOUISIANA, LAKE CHARLES DIVISION

Karamchand Doobay v. Judge James D. Cain, Jr. and Warden Pate

No. 2:25-cv-01914 · No. 2:25-cv-01914 · Decided January 22, 2026

SUMMARY

The Report and Recommendation addresses Karamchand Doobay’s 28 U.S.C. § 2241 petition challenging the Bureau of Prisons’ removal of First Step Act time credits after the Department of Homeland Security issued a final order of removal. The court concludes that 18 U.S.C. § 3632(d)(4)(E) bars a prisoner subject to a final removal order from applying First Step Act time credits, regardless of when the credits were earned, and recommends denial and dismissal with prejudice.

CASE DETAILS

COURT	United States District Court for the Western District of Louisiana, Lake Charles Division
WRITING FOR THE COURT	Thomas P. LeBlanc, United States Magistrate Judge
JURISDICTION	United States District Court for the Western District of Louisiana, Lake Charles Division
DECIDED	January 22, 2026
DOCKET	2:25-cv-01914
DISPOSITION	dismissed
PROCEDURAL POSTURE	Petitioner's 28 U.S.C. § 2241 habeas petition challenged the Bureau of Prisons' determination that he was ineligible to apply First Step Act federal time credits earned before the entry of a final order of removal. The magistrate judge issued a report and recommendation that the petition be denied and dismissed with prejudice and that pending motions be denied as moot.
STANDARD OF REVIEW	The report and recommendation was issued under 28 U.S.C. § 636(b)(1)(C) and Federal Rule of Civil Procedure 72(b); objections are subject to district-court review, and failure to object generally bars appellate challenge absent plain error.
PRECEDENTIAL VALUE	nonprecedential
PARTIES	Karamchand Doobay v. Judge James D. Cain, Jr., Warden Pate

TOPICS

federal habeas corpus

immigration

sentence modification

statutory interpretation

post-conviction relief

PRACTICE AREAS

Federal habeas corpus

Federal sentencing

Immigration detention and removal

QUESTIONS PRESENTED

1. Whether a prisoner subject to a final order of removal is ineligible to apply First Step Act time credits earned before the final order was entered.
2. Whether the Bureau of Prisons' removal of previously posted First Step Act time credits stated a basis for relief under 28 U.S.C. § 2241.

HOLDINGS

1. A prisoner subject to a final order of removal is ineligible to apply any First Step Act time credits to his sentence, including credits earned before the final order of removal was entered.
2. Doobay's petition failed to state a claim for relief under 28 U.S.C. § 2241.

KEY QUOTATIONS

“This Court agrees with the Ortega, Zuluaga and Chocon courts’ finding that the statute does not differentiate eligibility based upon when the deportation was ordered and thus concludes that Petitioner’s final order of deportation precludes him from applying any First Step Act time credits to his sentence, whether earned before or after the rendition of the final order of deportation.” (Law & Analysis)

“Accordingly, IT IS RECOMMENDED that the petition be DENIED and DISMISSED WITH PREJUDICE and all pending motions denied as MOOT.” (Conclusion)

FACTUAL BACKGROUND

Doobay is a Bureau of Prisons inmate held at the Federal Correctional Center in Oakdale, Louisiana, and is subject to a final administrative removal order issued by the Department of Homeland Security on July 30, 2024. He alleged that he had earned and received substantial First Step Act time credits before the removal order, but that the Bureau of Prisons later removed those credits. He sought recalculation and application of the credits and, if their application resulted in immediate release, transfer to Department of State or Immigration and Customs Enforcement custody for deportation.

PROCEDURAL HISTORY

Doobay filed his § 2241 petition on December 1, 2025, and later asserted that the Bureau of Prisons had improperly removed First Step Act time credits earned and posted before the July 30, 2024 final administrative removal order. The matter was referred to the magistrate judge for review and recommendation. The report recommends denial and dismissal with prejudice, subject to the parties' fourteen-day period for objections and subsequent district-court review.

DISPOSITION

dismissed

CASES CITED

- Ortega v. Warden, FCI-Texarkana, No. 5:23-CV-107, 2025 WL 3618826 (E.D. Tex. Sept. 9, 2025)
- Ortega v. Warden, FCI-Texarkana, No. 5:23-CV-107, 2025 WL 3618305 (E.D. Tex. Dec. 12, 2025)
- Zuluaga v. Warden, FCI-Texarkana, No. 5:23-CV-128, 2025 WL 2632550 (E.D. Tex. July 11, 2025)
- Zuluaga v. Warden, FCI-Texarkana, No. 5:23-CV-128, 2025 WL 2409198 (E.D. Tex. Aug. 20, 2025)
- Chocon-Gomez v. King, Civil Action No. 24-cv-2737, 2024 U.S. Dist. LEXIS 238542, 2024 WL 5381457 (D. Minn. Sept. 26, 2024)
- Jenkins v. Segal, No. 23-cv-425 (WMW/DTS), 2023 U.S. Dist. LEXIS 193751, 2023 WL 7131024, at *2 (D. Minn. Oct. 30, 2023)
- Jenkins v. Segal, 2023 WL 11692933 (8th Cir. Dec. 1, 2023)
- Quiceno v. Segal, No. 23-cv-358 (NEB/DJF), 2023 U.S. Dist. LEXIS 98954, 2023 WL 3855295, at *3 (D. Minn. Apr. 21, 2023)
- Quiceno v. Segal, 2023 U.S. Dist. LEXIS 97916, 2023 WL 3853433 (D. Minn. June 6, 2023)
- Douglass v. United Services Automobile Ass'n, 79 F.3d 1415, 1429-30 (5th Cir. 1996)

OPINION

UNITED STATES DISTRICT COURT WESTERN DISTRICT OF LOUISIANA LAKE CHARLES DIVISION KARAMCHAND DOOBAY DOCKET NO. 2:25-cv-01914 REG. # 67572-018 SECTION P VERSUS JUDGE JAMES D. CAIN, JR. WARDEN PATE MAGISTRATE JUDGE LEBLANC REPORT AND RECOMMENDATION Before the court is a petition for writ of habeas corpus filed pursuant to 28 U.S.C. § 2241 by pro se petitioner Karamchand Doobay on December 1, 2025.

Doc. 1. Doobay is an inmate in the custody of the Bureau of Prisons (“BOP”) and is currently incarcerated at the Federal Correctional Center at Oakdale, Louisiana (“FCIO”). This matter has been referred to the undersigned for review, report, and recommendation in accordance with 28 U.S.C. § 636 and the standing orders of this Court.

For the reasons stated below, IT IS RECOMMENDED that the matter be DENIED and DISMISSED WITH PREJUDICE. I. BACKGROUND Doobay filed a petition for writ of habeas corpus challenging the determination that he is not eligible to apply FTC (federal time credits) under the First Step Act earned prior to his Final Order of Removal. Doc. 6. Petitioner contends that he earned “substantial” First Step Act Time Credits prior to July 30, 2024, which were assessed and posted to his Time Credit Assessment.

Doc. 6-1, p. 1. On July 30, 2024, the Department of Homeland Security (DHS) issued a Final Administrative Removal Order (doc. 1-3), at which time the BOP removed his previously applied credits. *Id.* at p. 2. Doobay argues that the “BOP’s retroactive removal of these credits extended Petitioner’s incarceration beyond the release date he had lawfully earned under the FSA.” *Id.* He asks this Court to order the BOP to recalculate and apply all FTCs which were lawfully earned, calculated and applied prior to entry of the July 30, 2024 Final Administrative Order of Removal and, if the application results in immediate release, order the BOP to transfer him to DSH/ICE custody to effect deportation.

Doc. 6, p. 6. II. LAW & ANALYSIS Prisoners with a final order of removal or deportation are ineligible to apply First Step Act time credits, as provided in 18 U.S.C. §3632(d)(4)(E). However, Petitioner argues that time credits earned prior to the entry of any final order of deportation should be applied to his sentence regardless of the later entry of such an order.

This question was recently addressed by the Eastern District of Texas in *Ortega v. Warden, FCI-Texarkana*, No. 5:23-CV-107, 2025 WL 3618826 (E.D. Tex. Sept. 9, 2025), report and recommendation adopted, No. 5:23-CV-107, 2025 WL 3618305 (E.D. Tex. Dec. 12, 2025), and *Zuluaga v. Warden, FCI-Texarkana*, 5:23-CV-128, 2025 WL 2632550 (E.D. Tex. July 11, 2025), report and recommendation adopted, No. 5:23-CV-128, 2025 WL 2409198 (E.D.

Tex. Aug. 20, 2025). In each case, the Eastern District of Texas relied upon the court’s finding in *Chocon-Gomez v. King*, Civil Action No. 24-cv-2737, 2024 U.S. Dist. LEXIS 238542, 2024 WL 5381457 (D.Minn., September 26, 2024) in denying habeas petitions raising the same issue. There, the District of Minnesota explained as follows: Under 18 U.S.C. § 3632(d)(4)(E)(i), “[a] prisoner is ineligible to apply time credits under [the FSA] if the prisoner is the subject of a final order of removal under any provision of the immigration laws.” Chocon is ineligible to apply his earned time credits under the FSA, because he is subject to a final order of removal.

See Delgado Decl. ¶ 4, Ex. B. Pursuant to a provision of an immigration law, specifically 8 U.S.C. § 1225(b)(1), a Notice and Order of Expedited Removal was entered for Chocon on July 18, 2016 and served on Chocon on July 30, 2024. *Id.* Because of this final order of removal, Chocon’s immigration status is not unresolved, and he is therefore precluded pursuant to 18 U.S.C. § 3632(d)(4)(E)(i) from applying his earned time credits towards an early release of July 2024.

It is well settled that a prisoner with a final order of removal, such as Chocon, is not eligible to apply earned time credits under the FSA for an early release. See *Jenkins v. Segal*, No. 23-cv-425 (WMW/DTS), 2023 U.S. Dist. LEXIS 193751, 2023 WL 7131024, at *2 (D. Minn. Oct. 30, 2023) (“[A] prisoner with a final order of deportation is not eligible to apply accrued earned time credits to the imposed sentence” even “earned time credits... accrued prior to the deportation order” because “[t]he statute does not differentiate eligibility based upon when the deportation was ordered”), *affd*, 2023 WL 11692933 (8th Cir.

Dec. 1, 2023); Quiceno v. Segal, No. 23-cv-358 (NEB/DJF), 2023 U.S. Dist. LEXIS 98954, 2023 WL 3855295, at *3 (D. Minn. Apr. 21, 2023) (“[T]he FSA clearly states that ‘a prisoner is ineligible to apply FSA Time Credits if the prisoner is the subject of a final order of removal under any provision [of] the immigration laws.’” (quoting 18 U.S.C. § 3632(d)(4)(E)(i))), report and recommendation adopted sub nom., 2023 U.S. Dist.

LEXIS 97916, 2023 WL 3853433 (D. Minn. June 6, 2023). Chocon at *3-4 (emphasis added). This Court agrees with the Ortega, Zuluaga and Chocon courts’ finding that the statute does not differentiate eligibility based upon when the deportation was ordered and thus concludes that Petitioner’s final order of deportation precludes him from applying any First Step Act time credits to his sentence, whether earned before or after the rendition of the final order of deportation.

Petitioner’s claim is without merit. III. CONCLUSION For the reasons stated above, Doobay’s petition fails to state a claim for relief under 28 U.S.C. § 2241. Accordingly, IT IS RECOMMENDED that the petition be DENIED and DISMISSED WITH PREJUDICE and all pending motions denied as MOOT. Pursuant to 28 U.S.C. § 636(b)(1)(C) and Rule 72(b) of the Federal Rules of Civil Procedure, the parties have fourteen (14) days from receipt of this Report and Recommendation to file written objections with the Clerk of Court.

Failure to file written objections to the proposed factual findings and/or the proposed legal conclusions reflected in this Report and Recommendation within fourteen (14) days of receipt shall bar an aggrieved party from attacking either the factual findings or the legal conclusions accepted by the District Court, except upon grounds of plain error. See *Douglass v. United Services Automobile Ass’n*, 79 F.3d 1415, 1429-30 (Sth Cir.

1996). THUS DONE AND SIGNED in chambers this 22nd day of January, 2026. UNITED STATES MAGISTRATE JUDGE -4-