

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PRECEDENTIAL VALUE	nonprecedential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)