

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
MICHIGAN, SOUTHERN DIVISION

Alonso Magdaleno Rojas et al. v. Robert Lynch et al.

Case No. 1:25-cv-1818 · No. 1:25-cv-1818 · Decided January 2, 2026

SUMMARY

The United States District Court for the Western District of Michigan conditionally granted the immigration detainees’ petitions for writs of habeas corpus under 28 U.S.C. § 2241. The court held that 8 U.S.C. § 1226(a), rather than mandatory detention under § 1225(b)(2)(A), governed their detention and ordered bond hearings within five business days or immediate release.

CASE DETAILS

COURT	United States District Court for the Western District of Michigan, Southern Division
WRITING FOR THE COURT	Paul L. Maloney
JURISDICTION	United States District Court for the Western District of Michigan, Southern Division
DECIDED	January 2, 2026
DOCKET	1:25-cv-1818
DISPOSITION	writ_granted
PROCEDURAL POSTURE	Petitioners, ICE detainees, filed a counseled petition for a writ of habeas corpus under 28 U.S.C. § 2241 challenging the statutory and constitutional bases for their detention. After ordering Respondents to show cause and receiving a response and reply, the court conditionally granted habeas relief.
STANDARD OF REVIEW	The court reviewed the legality of Petitioners' detention under 28 U.S.C. § 2241 and considered the statutory and Fifth Amendment due-process issues de novo.
PRECEDENTIAL VALUE	Unpublished district court opinion; persuasive value only.
PARTIES	Alonso Magdaleno Rojas et al. v. Robert Lynch et al.

TOPICS

immigration detention

procedural due process

statutory interpretation

removal proceedings

civil procedure

PRACTICE AREAS

immigration law

habeas corpus

constitutional law

civil procedure

QUESTIONS PRESENTED

1. Whether prudential exhaustion of administrative remedies should bar Petitioners' § 2241 challenge to their immigration detention.
2. Whether 8 U.S.C. § 1225(b)(2)(A), rather than 8 U.S.C. § 1226(a), governs the detention of noncitizens who had resided in the United States and were apprehended within the country.
3. Whether Petitioners' detention under the mandatory-detention framework of § 1225(b)(2)(A) violates the Fifth Amendment Due Process Clause.
4. Whether the Detroit ICE Field Office Director is the only proper Respondent in a § 2241 action challenging immigration detention.

HOLDINGS

1. Prudential exhaustion does not bar Petitioners' § 2241 petition; alternatively, waiver of exhaustion is appropriate.
2. Section 1226(a), not the mandatory-detention provision in § 1225(b)(2)(A), governs noncitizens who have resided in the United States and were already within the country when apprehended and arrested.
3. Petitioners' current detention under the mandatory-detention framework of § 1225(b)(2)(A) violates the Fifth Amendment Due Process Clause.
4. The Detroit ICE Field Office Director is not the only proper Respondent; the court may retain both the Field Office Director and the Secretary of Homeland Security.

KEY QUOTATIONS

“The Constitution guarantees that the writ of habeas corpus is “available to every individual detained within the United States.”” (Section III)

FACTUAL BACKGROUND

Petitioners are Mexican citizens who entered the United States in or around July 2005 without being admitted or paroled and later resided in Detroit, Michigan. ICE officers arrested them in Detroit on December 4, 2025, and DHS issued each Petitioner a notice to appear charging inadmissibility under INA §§ 212(a)(6)(A)(i) and 212(a)(7)(A)(i)(I). Petitioners were detained at the North Lake Processing Center when they filed this habeas action.

PROCEDURAL HISTORY

Petitioners filed their § 2241 petition on December 17, 2025. The court ordered Respondents to show cause on December 19, 2025; Respondents responded on December 22, and Petitioners replied on December 29. The court declined to enforce prudential exhaustion, alternatively waived exhaustion, and conditionally granted the petition.

DISPOSITION

writ_granted

REMAND INSTRUCTIONS

Respondents must provide each Petitioner with a bond hearing under 8 U.S.C. § 1226(a) within five business days after the opinion and judgment, or immediately release each Petitioner. Respondents must file a status report within six business days certifying compliance and identifying the hearing date, bond decision, bond conditions if granted, or reasons for denial if bond is denied.

CASES CITED

- Hamdi v. Rumsfeld, 542 U.S. 507, 525 (2004)
- Zadvydas v. Davis, 533 U.S. 678, 687 (2001)
- A. A. R. P. v. Trump, 145 S. Ct. 1364, 1367 (2025)
- Antelex Cobix v. Raycraft, No. 1:25-cv-1669, 2025 WL 3562651 (W.D. Mich. Dec. 12, 2025)
- Candela Bastidas v. Noem, No. 1:25-cv-1528, 2025 WL 3562638 (W.D. Mich. Dec. 12, 2025)
- Acuna Sanchez v. Noem, No. 1:25-cv-1442, 2025 WL 3562577 (W.D. Mich. Dec. 12, 2025)
- Penagos Robles v. U.S. Dep't of Homeland Sec., No. 1:25-cv-1578, 2025 WL 3558128 (W.D. Mich. Dec. 12, 2025)

OPINION

Alonso Magdaleno Rojas et al. v. Robert Lynch et al.

PER CURIAM.

UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF MICHIGAN

SOUTHERN DIVISION

_____ ALONSO MAGDALENO ROJAS et al., Petitioners, Case No. 1:25-cv-1818 v. Honorable Paul L. Maloney ROBERT LYNCH et al., Respondents. _____/

OPINION

Petitioners, United States Immigration and Customs Enforcement (ICE) detainees currently detained at the North Lake Processing Center located in Baldwin, Lake County, Michigan, initiated this action on December 17, 2025, by filing a counseled petition for writ of habeas corpus pursuant to 28 U.S.C. § 2241. (Pet., ECF No. 1.) For the following reasons, the Court will conditionally grant Petitioners' petition for a writ of habeas corpus pursuant to 28 U.S.C. § 2241.

Discussion I. Procedural History In Petitioners' § 2241 petition, Petitioners challenge the lawfulness of their current detention and asks the Court to, inter alia, declare that Respondents' actions to detain Petitioners violate the Due Process Clause of the Fifth Amendment and the Immigration and Nationality Act (INA), and issue a writ of habeas corpus pursuant to 28 U.S.C. § 2241 either ordering Respondents to release Petitioners or ordering Respondents to conduct a bond hearing to satisfy the requirements of due process. (Pet., ECF No. 1, PageID.9–10.) In an order entered on December 19, 2025, the Court directed Respondents to show cause, within three business days, why the writ of habeas corpus and other relief requested by Petitioners should not be granted. (Order, ECF No. 5.) Respondents filed their response on December 22, 2025, (ECF No. 6.), and Petitioners filed their reply on December 29, 2025, (ECF No. 7).

II. Factual Background Petitioners are citizens of Mexico. (Pet., ECF No. 1, PageID.2; A. Rojas Notice to Appear (NTA), ECF No. 1-1, PageID.15; C. Rojas NTA, ECF No. 1-6, PageID.22.) Petitioners each entered the United States in or around July 2005 (Pet., ECF No. 1, PageID.3) at an unknown location without being “admitted or paroled.” (A. Rojas NTA, ECF No. 1-1, PageID.15; C. Rojas NTA, ECF No. 1-6, PageID.22). Prior to Petitioners' present detention, they resided in Detroit, Michigan. (Pet., ECF No. 1, PageID.3–4.) On December 4, 2025, ICE officers encountered and arrested Petitioners in Detroit, Michigan. (Id.) The Department of Homeland Security issued each Petitioner a Form I-862, NTA, charging Petitioners with inadmissibility under §§ 212(a)(6)(A)(i) and 212(a)(7)(A)(i)(I) of the INA because each Petitioner is an immigrant “present in the United States without being admitted or paroled, or who arrived in the United States at any time or place other than as designated by the Attorney General,” and “who, at the time of application for admission, is not in possession of a valid unexpired [immigration or travel document].” (A. Rojas NTA, ECF No. 1-1, PageID.15; C. Rojas NTA, ECF No. 1-6, PageID.22.)

III. Habeas Corpus Legal Standard The Constitution guarantees that the writ of habeas corpus is “available to every individual detained within the United States.” *Hamdi v. Rumsfeld*, 542 U.S. 507, 525 (2004) (citing U.S. Const., Art I, § 9, cl. 2). Section 2241 of Title 28 confers the federal courts with the power to issue writs of habeas corpus to persons “in custody in violation of the Constitution or laws or treaties of the United States.” 28 U.S.C. § 2241. This includes challenges by non-citizens in immigration- related matters. See *Zadvydas v. Davis*, 533 U.S. 678, 687 (2001); see also *A. R. P. v. Trump*, 145 S. Ct. 1364, 1367 (2025).

IV. Exhaustion Respondents argue that the Court should deny Petitioners' request for habeas corpus relief because Petitioners have not exhausted their administrative remedies. Specifically, Respondents argue that Petitioners should each pursue a bond hearing and, if necessary, appeal any unfavorable decision to the Board of Immigration Appeals (BIA). The Court declines to enforce the doctrine of prudential exhaustion against Petitioner, and even if the Court were to conclude that exhaustion is warranted, the Court concludes in the alternative that waiver of exhaustion is appropriate, for the reasons set forth in the Court's exhaustion analysis in each of the following cases: *Antele Cobix v. Raycraft*, No. 1:25-cv-1669, 2025 WL 3562651, at *2–3 (W.D. Mich. Dec. 12, 2025); *Candela Bastidas v. Noem*, No.

1:25-cv- 1528, 2025 WL 3562638, at *2–4 (W.D. Mich. Dec. 12, 2025); *Acuna Sanchez v. Noem*, No. 1:25- cv-1442, 2025 WL 3562577, at *2–4 (W.D. Mich. Dec. 12, 2025); *Penagos Robles v. U.S. Dep’t of Homeland Sec.*, No. 1:25-cv-1578, 2025 WL 3558128, at *2–3 (W.D. Mich. Dec. 12, 2025). Accordingly, the Court will proceed to address the merits of Petitioners’ § 2241 petition.

V. Merits Discussion A. Statutory Basis for Petitioners’ Detention Petitioners contend that Respondents have violated the INA by concluding that Petitioners are detained pursuant to the mandatory detention provisions set forth in 8 U.S.C. § 1225(b)(2). Respondents, however, contend that Petitioners meet every element for detention under § 1225(b)(2), and that the statute’s structure and history support Respondents’ interpretation. The Court concludes that § 1226(a), not § 1225(b)(2)(A), governs noncitizens, such as Petitioners, who have resided in the United States and were already within the United States when apprehended and arrested for the reasons set forth in the Court’s statutory analysis in each of the following cases: *Antele Cobix v. Raycraft*, No. 1:25-cv-1669, 2025 WL 3562651, at *3–6 (W.D. Mich. Dec. 12, 2025); *Candela Bastidas v. Noem*, No. 1:25-cv-1528, 2025 WL 3562638, at *4–6 (W.D. Mich. Dec. 12, 2025); *Acuna Sanchez v. Noem*, No. 1:25-cv-1442, 2025 WL 3562577, at *4–7 (W.D. Mich. Dec. 12, 2025); *Penagos Robles v. U.S. Dep’t of Homeland Sec.*, No. 1:25- cv-1578, 2025 WL 3558128, at *3–6 (W.D. Mich. Dec. 12, 2025).

B. Fifth Amendment Due Process Considerations Petitioners also argue that their detention violates the Fifth Amendment’s Due Process Clause. Respondents counter Petitioners’ arguments by stating that Petitioners have received notice of the charges against them, have access to counsel, are scheduled to attend hearings with an immigration judge, have the right to appeal the denial of any request for bond, and have been detained by ICE for less than three weeks. The Court concludes that Petitioners’ current detention under the mandatory detention framework set forth in § 1225(b)(2)(A) violates Petitioners’ Fifth Amendment due process rights for the reasons set forth in the Court’s constitutional analysis in each of the following cases: *Antele Cobix v. Raycraft*, No. 1:25-cv-1669, 2025 WL 3562651, at *6–8 (W.D. Mich. Dec. 12, 2025); *Candela Bastidas v. Noem*, No. 1:25-cv-1528, 2025 WL 3562638, at *7–8 (W.D. Mich. Dec. 12, 2025); *Acuna Sanchez v. Noem*, No. 1:25-cv-1442, 2025 WL 3562577, at *7–9 (W.D. Mich. Dec. 12, 2025); *Penagos Robles v. U.S. Dep’t of Homeland Sec.*, No. 1:25-cv-1578, 2025 WL 3558128, at *6–8 (W.D. Mich. Dec. 12, 2025).

VI. Other Claims and Other Forms of Relief Because the Court will conditionally grant Petitioners’ § 2241 petition as set forth herein, the Court does not address other claims and other requested relief in Petitioners’ § 2241 petition.

VII. Proper Respondents Respondents argue that the Detroit ICE Field Office Director is the only proper Respondent in this action, and they seek the dismissal of all of the other named Respondents. The Court concludes that the ICE Detroit Field Office Director is not the only proper Respondent for the reasons set forth in the Court’s analysis of the same argument in each of the following cases: *Antele Cobix v. Raycraft*, No. 1:25-cv-1669, 2025 WL 3562651, at *8–9 (W.D. Mich. Dec. 12, 2025); *Candela Bastidas v. Noem*, No. 1:25-cv-1528, 2025 WL 3562638, at *8–9 (W.D. Mich. Dec. 12, 2025); *Acuna Sanchez v. Noem*, No. 1:25-cv-1442, 2025 WL 3562577, at *9–10 (W.D. Mich. Dec. 12,

2025); *Penagos Robles v. U.S. Dep't of Homeland Sec.*, No. 1:25-cv-1578, 2025 WL 3558128, at *9–10 (W.D. Mich. Dec. 12, 2025). To ensure that this Court's orders regarding a hearing or release will bind at least one Respondent with authority to act in the event that Petitioners are transferred out of the Western District of Michigan, the Court will retain the ICE Detroit Field Office Director and the Secretary for the Department of Homeland Security as Respondents.

Conclusion For the reasons discussed above, the Court will enter a judgment conditionally granting Petitioners' petition for a writ of habeas corpus pursuant to 28 U.S.C. § 2241. (ECF No. 1.) The Court will order Respondents to provide each Petitioner with a bond hearing under 8 U.S.C. § 1226(a) within five business days of the date of this Court's opinion and judgment or, in the alternative, immediately release each Petitioner from custody.¹ The Court will also order Respondents to file a status report within six business days of the date of this Court's opinion and judgment to certify compliance with this opinion and the corresponding judgment. The status report shall include if and when the bond hearings occurred, if bond was granted or denied, and if bond was granted, the conditions of the bond, or if bond was denied, the reasons for the denial.

Dated: January 2, 2026 /s/ Paul L. Maloney Paul L. Maloney United States District Judge 1 This Court has adopted a standard practice of requiring such a hearing within five business days, even if the Petitioner requests a deadline that is shorter or longer.