

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

Meet Prajapati v. Rafael Vergara

Prajapati · No. 5:26-cv-00008-DCB-BWR · Decided April 6, 2026

SUMMARY

The magistrate judge recommends dismissing as moot Meet Prajapati’s 28 U.S.C. § 2241 petition challenging his immigration detention and denying his motion for a temporary restraining order. The recommendation concludes that Petitioner’s removal to India and release from ICE custody eliminated the live controversy. The respondent’s motion to dismiss for mootness is recommended for granting.

CASE DETAILS

COURT	United States District Court for the Southern District of Mississippi, Western Division
WRITING FOR THE COURT	Bradley W. Rath
JURISDICTION	United States District Court for the Southern District of Mississippi, Western Division
DECIDED	April 6, 2026
DOCKET	5:26-cv-00008-DCB-BWR
DISPOSITION	dismissed
PROCEDURAL POSTURE	Petitioner filed a 28 U.S.C. § 2241 petition challenging his detention during removal proceedings and seeking immediate release, followed by a motion for a temporary restraining order. After Petitioner was removed from the United States, Respondent moved to dismiss the petition and temporary-restraining-order motion as moot. The magistrate judge issued a report and recommendation.
STANDARD OF REVIEW	The district judge will determine de novo any part of the report and recommendation to which a proper objection is made; unobjected-to findings and conclusions are reviewed only for plain error under the notice stated in the report.
PRECEDENTIAL VALUE	nonprecedential
PARTIES	Meet Prajapati v. Rafael Vergara, Warden, Adams County Correctional Center

TOPICS

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QUESTIONS PRESENTED

1. Whether Prajapati's § 2241 petition seeking release from immigration detention became moot after he was removed from the United States and released from ICE custody.
2. Whether the motion for a temporary restraining order should be denied as moot after Prajapati's removal.

HOLDINGS

1. The petition became moot because Petitioner was removed from the United States and released from ICE custody, so the requested relief of release from detention could no longer provide him a live, redressable remedy.
2. The motion for a temporary restraining order should be denied as moot because Petitioner had been removed and was no longer in ICE custody.

KEY QUOTATIONS

“Under Article III of the Constitution, federal courts may adjudicate only actual, ongoing cases or controversies.” (2)

“Mootness doctrine requires that, to show a case or controversy under Article III of the Constitution, ‘through all stages of federal judicial proceedings, trial and appellate[,] . . . parties must continue to have a personal stake in the outcome of the lawsuit.’” (2)

FACTUAL BACKGROUND

Meet Prajapati, a native and citizen of India, entered the United States illegally on May 12, 2023, surrendered to immigration authorities, and was placed in removal proceedings. ICE arrested and detained him in November 2025, after which he was granted voluntary departure with a March 7, 2026 deadline. He filed a habeas petition seeking release from detention, but ICE removed him to India on February 22, 2026, before the court resolved his claims.

PROCEDURAL HISTORY

Prajapati filed his § 2241 petition on January 13, 2026, and moved for a temporary restraining order on February 5, 2026. He was removed to India on February 22, 2026. Respondent moved to dismiss for mootness, and Petitioner did not respond. The magistrate judge recommended denying the temporary restraining order, granting the motion to dismiss, and dismissing the petition as moot, subject to review by the district judge under Federal Rule of Civil Procedure 72(b).

DISPOSITION

dismissed

CASES CITED

- Lewis v. Cont'l Bank Corp., 494 U.S. 472, 477 (1990)
- Bacilio-Sabastian v. Barr, 980 F.3d 480, 482 (5th Cir. 2020)
- Dep't of Homeland Sec. v. Thuraissigiam, 591 U.S. 103, 106 (2020)
- Douglass v. United Servs. Auto. Assoc., 79 F.3d 1415, 1428-29 (5th Cir. 1996)

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