

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
FLORIDA, FORT MYERS DIVISION

Luis Alain Navarro Perera v. Pamela Bondi et al.

Navarro Perera · No. 2:25-cv-01054-SPC-NPM · Decided November 25, 2025

SUMMARY

The court denied the petitioner’s motion seeking clarification about service requirements in a habeas action challenging immigration detention. Applying Section 2254 Rule 4 through Rule 1(b), the court declined to serve the additional officials named as respondents and did not address the potential consequences of that litigation strategy.

CASE DETAILS

COURT	United States District Court for the Middle District of Florida, Fort Myers Division
JURISDICTION	United States District Court for the Middle District of Florida, Fort Myers Division
DECIDED	November 25, 2025
DOCKET	2:25-cv-01054-SPC-NPM
DISPOSITION	other
PROCEDURAL POSTURE	Petitioner moved for clarification of service requirements in a federal habeas action after the Court directed the clerk to serve the petition on the Attorney General and the local United States Attorney's Office.
PRECEDENTIAL VALUE	Unknown
PARTIES	Luis Alain Navarro Perera v. Pamela Bondi et al.

TOPICS

- federal habeas corpus
- immigration detention
- service of process
- civil procedure

PRACTICE AREAS

- Federal habeas corpus
- Immigration detention
- Service of process

QUESTIONS PRESENTED

- Whether the Court should require service of the habeas petition on the additional federal and state officials named as respondents.

2. Whether Section 2254 Rule 4 contemplates service on multiple respondents in this case.

HOLDINGS

1. The Court would not take action to serve the other officials named in the petition.

KEY QUOTATIONS

“The statutes and rules governing habeas actions reflect “that there is generally only one proper respondent to a given prisoner’s habeas petition.””

“The Court will not take any action to serve the other officials named in the petition.”

FACTUAL BACKGROUND

Luis Alain Navarro Perera was detained at a facility known as Alligator Alcatraz and filed a habeas action against five federal and state officials. The Court ordered the petition sent to the Attorney General and the local United States Attorney's Office under Section 2254 Rule 4. Through counsel, Petitioner asked whether the additional officials named as respondents also needed to be served.

PROCEDURAL HISTORY

Navarro Perera, who was detained at Alligator Alcatraz, filed a habeas petition against five federal and state officials through counsel. After preliminary review, the Court found that the petition warranted a response and ordered service under Section 2254 Rule 4. Petitioner then sought clarification about whether the other named respondents also had to be served; the Court denied the motion.

DISPOSITION

other

CASES CITED

- Rumsfeld v. Padilla, 542 U.S. 426, 485 (2004)

OPINION

Luis Alain Navarro Perera v. Pamela Bondi et al.

PER CURIAM.

UNITED STATES DISTRICT COURT

MIDDLE DISTRICT OF FLORIDA

FORT MYERS DIVISION

LUIS ALAIN NAVARRO PERERA,

Petitioner, v. Case No.: 2:25-cv-01054-SPC-NPM PAMELA BONDI et al., Respondents, /

ORDER

Before the Court is Petitioner Luis Alain Navarro Perera’s Motion for Clarification of Service

Requirements (Doc. 6). Navarro Perera is detained in the facility known as Alligator Alcatraz, and he filed this habeas action against five federal and state officials through counsel. The Court conducted a preliminary review of the petition, found it warranted a response, and directed the clerk to send the petition to the Attorney General and the local United States Attorney's Office in accordance with Section 2254 Rule 4.1. Petitioner's counsel now asks the Court to clarify whether they must serve the other respondents. 1 The Court applies the rules to this case under Section 2254 Rule 1(b) ("The district court may apply any or all of these rules to a habeas corpus petition not covered by Rule 1(a)"). The statutes and rules governing habeas actions reflect "that there is generally only one proper respondent to a given prisoner's habeas petition." *Rumsfeld v. Padilla*, 542 U.S. 426, 485 (2004). The petitioner muddied the waters here by naming five officials as respondents.² The Court ordered service under Section 2254 Rule 4, which does not contemplate multiple respondents. The Court will not take any action to serve the other officials named in the petition. Nor will it speculate on the potential consequences of the petitioner's litigation strategy in an unbriefed, ex parte opinion. Accordingly, the petitioner's motion (Doc. 6) is denied. DONE AND ORDERED in Fort Myers, Florida on November 24, 2025. , tite WObLatrat he 3

UNITED STATES DISTRICT JUDGE

SA: FTMP-1

2 To be sure, some confusion about the proper respondent is reasonable. The Supreme Court has not yet clarified whether habeas challenges to immigration detention should be directed at the Attorney General or the immediate custodian. See *Padilla*, 542 U.S. at 435 n.8,.