

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
WEST VIRGINIA

Rolando Rodriguez-Flores, et al. v. Leonard Oddo, et al.

Rodriguez-Flores · No. 3:26-cv-00169 · Decided March 23, 2026

SUMMARY

The Southern District of West Virginia granted the Government’s motion to transfer a habeas corpus action concerning an immigration detainee. Applying *Rumsfeld v. Padilla*, the court held that jurisdiction for a challenge to present confinement lies in the district of confinement, which was the Western District of Pennsylvania when the petition was filed. The court rejected an asserted bad-faith-transfer exception and directed the Clerk to transfer the action.

CASE DETAILS

COURT	United States District Court for the Southern District of West Virginia
JURISDICTION	United States District Court for the Southern District of West Virginia
DECIDED	March 23, 2026
DOCKET	3:26-cv-00169
DISPOSITION	other
PROCEDURAL POSTURE	Petitioner filed a petition for a writ of habeas corpus challenging his immigration detention. Respondents moved to transfer the action for lack of jurisdiction because Petitioner was confined in the Western District of Pennsylvania when he filed the petition.
PRECEDENTIAL VALUE	unknown
PARTIES	Rolando Rodriguez-Flores, et al. v. Leonard Oddo, et al.

TOPICS

- subject matter jurisdiction
- venue
- immigration detention
- civil procedure

PRACTICE AREAS

- immigration law
- habeas corpus
- federal civil procedure

QUESTIONS PRESENTED

1. Whether the Southern District of West Virginia had jurisdiction over a habeas petition challenging present confinement when the petitioner was physically confined in the Western District of Pennsylvania at the time of filing.
2. Whether the court should transfer the action under 28 U.S.C. § 1631 rather than dismiss it for lack of jurisdiction.

HOLDINGS

1. Under the bright-line rule for habeas challenges to present confinement, jurisdiction lies in the district of confinement, so the Southern District of West Virginia lacked jurisdiction because Petitioner was confined in the Western District of Pennsylvania when he filed the petition.
2. When the court lacks jurisdiction but the action could have been brought in another federal court, transfer to that court is appropriate under 28 U.S.C. § 1631 when transfer is in the interest of justice.

KEY QUOTATIONS

“jurisdiction lies in only one district: the district of confinement.” (2)

“Accordingly, the Court similarly finds it does not have jurisdiction over this action.” (3)

FACTUAL BACKGROUND

Rolando Rodriguez-Flores was arrested after a traffic stop and initially detained at a West Virginia regional jail. ICE transferred him to the Moshannon Valley Processing Center in Clearfield County, Pennsylvania, on February 27, 2026. He filed his habeas petition in the Southern District of West Virginia on March 2, 2026, while physically confined in the Western District of Pennsylvania.

PROCEDURAL HISTORY

Petitioner was arrested and detained by ICE in West Virginia, then transferred to the Moshannon Valley Processing Center in Pennsylvania. He filed his habeas petition in the Southern District of West Virginia three days after the transfer. After briefing on jurisdiction, the court granted Respondents' motion and directed the Clerk to transfer the action to the Western District of Pennsylvania.

DISPOSITION

other

REMAND INSTRUCTIONS

The Clerk was directed to transfer the civil action to the United States District Court for the Western District of Pennsylvania.

CASES CITED

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

- Gonzalez Falla v. Oddo, 3:26-cv-00172 (S.D. W. Va. Mar. 11, 2026) (ECF No. 16)
- Gonzalez-Hernandez v. Oddo, 2:26-cv-00179, 2026 WL 672754 (S.D. W. Va. Mar. 10, 2026)
- Suri v. Trump, No. 25-1560, 2025 WL 1806692 (4th Cir. July 1, 2025)

OPINION

IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA HUNTINGTON DIVISION ROLANDO RODRIGUEZ-FLORES, et al., Petitioners, v. CIVIL ACTION NO. 3:26-cv-00169 LEONARD ODDO, et al., Respondents. MEMORANDUM OPINION AND ORDER Pending before the Court is the Motion to Transfer Venue, (ECF No. 14), of Respondents Leonard Oddo, Facility Administrator of the Moshannon Valley Processing Center (“MVPC”); John Rife, the Field Office Director of the Philadelphia Field Office of ICE; Todd Lyons, the Acting Director of ICE; Kristi Noem, the Secretary of Homeland Security; and Pamela Bondi, the United States Attorney General, (collectively the “Government”).

For the reasons discussed below, the Court GRANTS the motion. I. BACKGROUND On Thursday February 26, 2026, Petitioner Rolando Rodriguez-Flores (“Petitioner”) was pulled over for an alleged tinted window violation and subsequently arrested and jailed by ICE. (ECF No. 1 at 8, ¶ 3.) At first, Petitioner was detained at Western Regional Jail (“WRJ”), and it was understood that Petitioner would be transferred to South Central Regional Jail (“SCRJ”) on Friday, February 27, 2026.

(See *id.* at 5, ¶ 12.) However, ICE instead transferred Petitioner to MVPC in Phillipsburg, Pennsylvania. (*Id.* at 1, ¶ 1.) This transfer occurred on February 27, 1 2026. (See *id.* at 7, ¶¶ 25–26.) Then, three days later, on March 2, 2026, Petitioner filed the pending Petition for Writ of Habeas Corpus. (*id.*) It is undisputed that when Petitioner filed his Petition in this Court, he was in the Custody of MVPC, a facility within the Western District of Pennsylvania.¹ (See *id.* at 1, ¶ 1.)

Pursuant to the Court’s Briefing Order,² (ECF No. 10), both the Petitioner and the Government filed respective responses to the Order. (See ECF Nos. 13, 15.) Of relevance, the Government also moved to transfer the Petition for lack of jurisdiction. (ECF No. 14.) Petitioner filed a Reply, (ECF No. 16.), and both parties made several filings with supplemental information, (ECF Nos. 13-1, 13-2, 14-1).

As such, this issue is fully briefed and ripe for adjudication. II. LEGAL STANDARD Title 28 U.S.C. § 1631 provides a court with authority to transfer a case for lack of jurisdiction. Specifically, Section 1631 provides that “the court shall, if it is in the interest of justice, transfer such action or appeal to any other such court... in which the action or appeal could have been brought at the time it was filed or noticed.” 28 U.S.C. § 1631; see also 28 U.S.C. § 1406(a).

III. DISCUSSION Petitioner contends that this Court has jurisdiction over his petition, even though he was confined within the Western District of Pennsylvania when he filed his Petition.

(See generally ECF No. 13.)

The Government, however, argues that this Court does not have jurisdiction 1 MVPC is located in Clearfield County, Pennsylvania, which is located within the jurisdictional boundaries of the Western District of Pennsylvania. See Moshannon Valley Processing Center, U.S. Immigr. & Customs Enf't, <https://www.ice.gov/detain/detention-facilities/moshannon-valley-processing-center>; see also 28 U.S.C. § 118(c).

2 This Court entered an order directing the parties to file briefings “on why this Court has jurisdiction.” (ECF No. 10.) 2 because Petitioner was not within this district when he filed his Petition. (See generally ECF No. 15.)

In *Rumsfeld v. Padilla*, 542 U.S. 426, 448–49 (2004), the Supreme Court created a “bright- line rule” for habeas challenges to present confinement. Under this rule, “jurisdiction lies in only one district: the district of confinement.”³ *Id.* at 443.

Accordingly, pursuant to this rule, a district court only has jurisdiction if the petitioner is physically within that court’s district at the time of filing his petition.⁴ See *id.* at 448–49. Here, the timing is clear: when Petitioner filed his petition he was in the Western District of Pennsylvania, not this district. (ECF No. 1 at 1, ¶ 1.) This Court in two other cases has already determined that it does not have jurisdiction over similar petitioners.

See *Gonzalez Falla v. Oddo*, 3:26-cv-00172 (S.D. W. Va. March 11, 2026) (ECF No. 16) (Goodwin, J.) (transferring petition to the Western District of Pennsylvania); *Gonzalez-Hernandez v. Oddo*, 2:26-cv-00179, 2026 WL 672754 (S.D. W. Va. March 10, 2026) (Berger, J.) (transferring petition to the Western District of Pennsylvania).

In both cases, the petitioners filed their habeas corpus petitions days after they had been moved out of this district and into the Western District of Pennsylvania. *Gonzalez Falla*, 3 The Kennedy concurrence suggests acknowledging an exception if the Government attempts to make it “difficult” for the petitioner’s lawyer to know where to file a petition, or if the government is not “forthcoming with respect to the identity of the custodian and the place of detention.” *Padilla*, 542 U.S. at 454 (Kennedy, J., concurring).

Here, however, Petitioner attempts to stretch Kennedy’s concurrence and asks this Court to create an exception when the Government makes a bad-faith transfer of a petitioner. (See generally ECF No. 13.) Yet there is no established exception to the bright line rule for bad faith forum shopping by the Government. See *Padilla*, 542 U.S. at 448 (“The dissent cites no authority whatsoever for its extraordinary proposition that... jurisdiction might be premised on ‘punishing’ alleged Government misconduct.”).

Further, recognizing an exception would be unnecessary because the courts are open to Petitioner in the Western District of Pennsylvania. See *id.* at 432, 441 (finding the petitioner could have brought his petition in the District of South Carolina because that court “acquired jurisdiction” over the petitioner through his physical confinement in the district).

Thus, I would transfer regardless of the ICE motivation in order to comport with the “longstanding” bright line rule. See *id.* at 449. 4 The only limited exception to this rule is when “a prisoner is held in an undisclosed location by an unknown custodian [because] it is impossible to apply the immediate custodian and district of confinement rules.” *Padilla*, 542 U.S. at 450 n.18; see also *Suri v. Trump*, No. 25-1560, 2025 WL 1806692, at *4–5 (4th Cir.

July 1, 2025) (discussing the “unknown custodian exception”). 3 (ECF No. 16) (filing petition three days after detainment at MVPC); *Gonzalez-Hernandez*, 2026 WL 672754, at *2 (filing petition eight days after detainment at MVPC).

As such, the relevant facts are identical to the present case, and the Court adopts their reasoning entirely. Accordingly, the Court similarly finds it does not have jurisdiction over this action. Iv. CONCLUSION For the reasons discussed herein, the Court FINDS that it does not have jurisdiction over this matter.

The Court further DIRECTS the Clerk of this Court to TRANSFER this civil action to the Western District of Pennsylvania. IT IS SO ORDERED. The Court DIRECTS the Clerk to send a copy of this Order to counsel of record and any unrepresented party. ENTER: March 23, 2026 GE UNITED STATES DISTRICT JUDGE