

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)

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