

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
TENNESSEE

Rutilio Rosales Barrera v. Christopher Bullock

No. 2:26-cv-02363-MSN-tmp, United States District Court for the Western District of Tennessee (May 6, 2026)

SUMMARY

The United States District Court for the Western District of Tennessee granted the Government’s motion to dismiss a 28 U.S.C. § 2241 habeas petition after the petitioner was deported to Mexico. The court denied the petition and the petitioner’s motion for a temporary restraining order and preliminary injunction as moot because the requested relief could no longer be granted.

CASE DETAILS

COURT	United States District Court for the Western District of Tennessee
WRITING FOR THE COURT	Mark S. Norris
JURISDICTION	United States District Court for the Western District of Tennessee
DECIDED	May 6, 2026
DOCKET	2:26-cv-02363-MSN-tmp
DISPOSITION	dismissed
PROCEDURAL POSTURE	Petitioner brought a 28 U.S.C. § 2241 habeas petition seeking immediate release or an individualized bond hearing and moved for a temporary restraining order and preliminary injunction. The Government moved to dismiss after Petitioner was deported to Mexico.
PRECEDENTIAL VALUE	Unpublished district court order; precedential status is not stated in the opinion.
PARTIES	Rutilio Rosales Barrera, Petitioner v. Christopher Bullock, Respondent

TOPICS

- federal habeas corpus
- immigration detention
- deportation
- removal proceedings
- injunctions

PRACTICE AREAS

- federal habeas corpus
- immigration detention
- immigration
- civil procedure

QUESTIONS PRESENTED

1. Whether Petitioner's § 2241 habeas petition seeking release or an individualized bond hearing became moot after Petitioner was deported from the United States.
2. Whether the Government's motion to dismiss should be granted and Petitioner's motion for a temporary restraining order and preliminary injunction denied as moot.

HOLDINGS

1. Petitioner's habeas petition became moot because, after his deportation, the Court could no longer grant the requested release or bond-hearing relief, and a decision on the merits would lack any practical effect.

KEY QUOTATIONS

“the “core” question of the “mootness inquiry ‘is whether the relief sought would, if granted, make a difference to the legal interests of the parties.’” (PageID 60–61)

“If—“as a result of events during the pending of the litigation—the court’s decision would lack any practical effect, the case is moot.”” (PageID 61)

FACTUAL BACKGROUND

Petitioner filed a § 2241 petition seeking immediate release or an individualized bond hearing, along with a motion for a temporary restraining order and preliminary injunction. During the litigation, ICE deported Petitioner to Mexico on April 5, 2026. Because Petitioner was no longer within the Court's reach, the requested relief could no longer be granted.

PROCEDURAL HISTORY

The Government represented that ICE removed Petitioner to Mexico on April 5, 2026. Because Petitioner was no longer within the Court's reach, the Court concluded that it could not grant the requested release or bond-hearing relief and that a decision on the merits would have no practical effect. The Court granted the Government's motion to dismiss and denied the habeas petition and injunctive motion as moot.

DISPOSITION

dismissed

CASES CITED

- Lathfield Invs., LLC v. City of Lathrup Vill., 136 F.4th 282, 292 (6th Cir. 2025)
- McPherson v. Mich. High Sch. Athletic Ass'n, Inc., 119 F.3d 453, 458 (6th Cir. 1997) (en banc)
- Patton v. Fitzhugh, 131 F.4th 383, 392 (6th Cir. 2025)
- Ohio v. US EPA, 969 F.3d 306, 308 (6th Cir. 2020)

OPINION

RUTILIO ROSALES BARRERA, Petitioner, v. Case No. 2:26-cv-02363-MSN-tmp
CHRISTOPHER BULLOCK, Respondent.

Before the Court is the Government's Motion to Dismiss Petitioner's Petition for Writ of Habeas Corpus (ECF No. 10), filed April 9, 2026.

The relief Petitioner initially sought in this matter was immediate release or an individualized bond hearing. (ECF No. 2.) But this relief can no longer be granted, because Petitioner is no longer within the reach of this Court, whether it ordered release, a bond hearing, or otherwise. (ECF No. 10 at PageID 60–61.)

Athletic Ass’n, Inc., 119 F.3d 453, 458 (6th Cir. 1997) (en banc)). If—“as a result of events during the pending of the litigation—the court’s decision would lack any practical effect, the case is moot.” *Patton v. Fitzhugh*, 131 F.4th 383, 392 (6th Cir. 2025) (quoting *Ohio v. US EPA*, 969 F.3d 306, 308 (6th Cir. 2020)). Such is the case here.

The Government’s argument is well-taken, as any decision on the substance of Petitioner’s claims would “lack any practical effect.” *Id.* Accordingly, the Government’s Motion to Dismiss (ECF No. 10) is GRANTED, and Petitioner’s Motion for Temporary Restraining Order and Preliminary Injunction (ECF No. 3) and § 2241 Petition (ECF No. 1) are DENIED AS MOOT. IT IS SO ORDERED, this 6th day of May, 2026. s/ Mark S. Norris MARK S. NORRIS UNITED STATES DISTRICT JUDGE

