

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

R.A.N.O. v. Wofford, et al.

R.A.N.O. · No. 1:25-cv-01535-KES-EPG (HC) · Decided January 6, 2026

SUMMARY

The United States District Court for the Eastern District of California granted R.A.N.O.’s first amended petition for a writ of habeas corpus challenging his re-detention after three years of humanitarian parole. The court held that petitioner possessed a protected liberty interest in continued release and was entitled to a bond hearing under the Due Process Clause. The court further determined that the government must bear the burden of proof and that a pre-deprivation hearing was required.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	January 6, 2026
DOCKET	1:25-cv-01535-KES-EPG (HC)
DISPOSITION	writ_granted
PROCEDURAL POSTURE	Petition for writ of habeas corpus under 28 U.S.C. § 2241 challenging the petitioner's immigration re-detention and seeking release unless the government provides constitutionally adequate process.
STANDARD OF REVIEW	The court evaluated the habeas claim de novo under 28 U.S.C. § 2241(c)(3) and analyzed the procedural due process claim using the Mathews v. Eldridge balancing factors.
PRECEDENTIAL VALUE	unpublished district court decision
PARTIES	R.A.N.O. v. Minga Wofford, Mesa Verde ICE Processing Center Facility Administrator, Sergio Albarran, Todd M. Lyons, Kristi Noem, Pamela Bondi

TOPICS

- immigration detention
- federal habeas corpus
- procedural due process
- removal proceedings
- immigration

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether a noncitizen who entered the United States, was detained, and was later released on humanitarian parole possesses a protected liberty interest in remaining out of immigration custody.
2. Whether due process requires a pre-deprivation bond hearing before the government may re-detain such a noncitizen pending removal proceedings.
3. Whether the government must prove by clear and convincing evidence at that hearing that the noncitizen is a flight risk or danger to the community.
4. Whether habeas relief may require immediate release and prospective protection against re-detention without constitutionally adequate process.

HOLDINGS

1. A noncitizen who was released from immigration detention on humanitarian parole and remained at liberty for an extended period possesses a protected liberty interest in remaining out of custody.
2. The government may not re-detain petitioner pending removal proceedings without first providing a pre-deprivation bond hearing before a neutral decisionmaker.
3. At the pre-deprivation bond hearing, the government must demonstrate by clear and convincing evidence that petitioner is a flight risk or danger to the community such that physical custody is legally justified.
4. Habeas relief was available to secure petitioner's immediate release and to prevent future re-detention without a constitutionally adequate pre-deprivation hearing.

KEY QUOTATIONS

“Respondents are ORDERED to release petitioner immediately. Respondents are ENJOINED AND RESTRAINED from re-detaining petitioner unless they demonstrate, by clear and convincing evidence at a pre-deprivation bond hearing before a neutral decisionmaker, that petitioner is a flight risk or danger to the community such that his physical custody is legally justified.” (at 12-13)

“The Court similarly finds that petitioner has a due process right to challenge his re-detention pending his removal proceedings.” (at 10)

“On balance, the Mathews factors show that petitioner is entitled to a bond hearing.” (at 11)

FACTUAL BACKGROUND

R.A.N.O., an asylum-seeker from Nicaragua, entered the United States in October 2022, was detained, and was released two days later on humanitarian parole. He remained at liberty for approximately three years, established community and family ties, worked with valid authorization, pursued asylum in removal proceedings, and maintained a clean criminal record. Although the government alleged missed, delayed, or improperly completed ISAP check-ins, the record did not show that ICE warned him of noncompliance before directing him to report in person and re-detaining him on October 29, 2025.

PROCEDURAL HISTORY

R.A.N.O. filed an original habeas petition and motion for a temporary restraining order on November 10, 2025. He filed a first amended petition and amended temporary-restraining-order motion on November 19, 2025. After briefing, the district court granted the first amended petition, ordered immediate release, and enjoined re-detention absent a pre-deprivation bond hearing satisfying the specified burden and decisionmaking requirements.

DISPOSITION

writ_granted

CASES CITED

- Saravia v. Sessions, 280 F. Supp. 3d 1168, 1176 (N.D. Cal. 2017), aff'd sub nom. Saravia for A.H. v. Sessions, 905 F.3d 1137 (9th Cir. 2018)
- Hamdi v. Rumsfeld, 542 U.S. 507, 525, 529 (2004)
- Preiser v. Rodriguez, 411 U.S. 475, 484, 487 (1973)
- I.N.S. v. St. Cyr, 533 U.S. 289, 301 (2001)
- Zadvydas v. Davis, 533 U.S. 678, 687, 689-90, 693-94, 701 (2001)
- Leng May Ma v. Barber, 357 U.S. 185, 187 (1958)
- U.S. ex rel. Knauff v. Shaughnessy, 338 U.S. 537, 544 (1950)
- Xi v. I.N.S., 298 F.3d 832, 836-39 (9th Cir. 2002)
- Dep't of Homeland Sec. v. Thuraissigiam, 591 U.S. 103, 107, 115-20, 139-40 (2020)
- Barrera-Echavarria v. Rison, 44 F.3d 1441, 1443-50 (9th Cir. 1995) (en banc)
- Padilla v. ICE, 704 F. Supp. 3d 1163, 1170-72 (W.D. Wash. 2023)
- Rodriguez v. Marin, 909 F.3d 252, 256 (9th Cir. 2018)
- Young v. Harper, 520 U.S. 143, 147-49 (1997)
- Gagnon v. Scarpelli, 411 U.S. 778, 782 (1973)
- Morrissey v. Brewer, 408 U.S. 471, 481-84, 482, 484-90 (1972)
- Gonzalez-Fuentes v. Molina, 607 F.3d 864, 887 (1st Cir. 2010)
- Hernandez v. Sessions, 872 F.3d 976, 981, 993 (9th Cir. 2017)
- Cleveland Bd. of Educ. v. Loudermill, 470 U.S. 532, 538-42 (1985)
- Vitek v. Jones, 445 U.S. 480, 491 (1980)
- Zinermon v. Burch, 494 U.S. 113, 127 (1990)
- United States v. James Daniel Good Real Prop., 510 U.S. 43, 53, 59-61 (1993)