

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

E.A.P.C. v. Minga Wofford, et al.

Case No. 1:25-cv-01546-JLT-CDB (HC) · No. 1:25-cv-01546-JLT-CDB (HC) · Decided January 6, 2026

SUMMARY

These findings and recommendations address a federal detainee’s petition for a writ of habeas corpus under 28 U.S.C. § 2241. The court recommends granting the petition in part, concluding that the petitioner’s procedural due process claim concerning parole revocation and detention warrants relief. The document also addresses exhaustion, the statutory immigration detention framework, and substantive due process.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	United States Magistrate Judge
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	January 6, 2026
DOCKET	1:25-cv-01546-JLT-CDB (HC)
DISPOSITION	other
PROCEDURAL POSTURE	Petition for writ of habeas corpus under 28 U.S.C. § 2241 by a federal immigration detainee challenging his detention under procedural and substantive due process theories. The magistrate judge issued findings and recommendations recommending that the petition be granted in part and that the case be closed, subject to review by the assigned district judge after a 14-day objection period.
STANDARD OF REVIEW	For procedural due process, the court applied the three-factor balancing test from Mathews v. Eldridge. For substantive due process, the court considered whether the detention had a rational regulatory purpose or was excessive in relation to that purpose, applying the standard articulated in United States v. Torres.
PRECEDENTIAL VALUE	nonprecedential
PARTIES	E.A.P.C., Petitioner v. Minga Wofford, et al., Respondents

TOPICS

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QUESTIONS PRESENTED

1. Whether prudential exhaustion of available administrative remedies should be waived as futile in a § 2241 challenge to immigration detention.
2. Whether Petitioner's re-detention without a substantive, individualized parole-revocation hearing violated procedural due process.
3. Whether Petitioner's continued immigration detention was punitive or excessive in relation to a legitimate regulatory purpose, in violation of substantive due process.

HOLDINGS

1. The prudential exhaustion requirement should be waived because seeking administrative release would be futile where Respondents maintained that Petitioner was subject to mandatory detention under 8 U.S.C. § 1225(b), leaving him without a statutory right to a bond hearing.
2. Petitioner's petition should be granted as to procedural due process because, given his prior release on his own recognizance and the government's failure to establish that the new mandatory-detention interpretation applied to him, the procedures used for his re-detention were inadequate to protect his liberty interest in remaining out of custody.
3. Petitioner's petition should be denied as to substantive due process because the record did not establish that his detention lacked a rational regulatory purpose or was excessive in relation to that purpose.

KEY QUOTATIONS

"because Petitioner has shown the procedures or lack thereof as applied to Petitioner are not sufficient to protect his liberty interest, the Court concluded that Petitioner has demonstrated a likelihood of success on the merits of his procedural due process claim." (at IV.A)

"Petitioner does not show that his detention was punitive or excessive in relation to the purpose of the governing detention regime." (at IV.B)

FACTUAL BACKGROUND

Petitioner had been present in the United States for approximately four years and had been released by ICE on his own recognizance in November 2021 while his section 240 removal proceedings were pending. After the government adopted a new interpretation of 8 U.S.C. §§ 1225 and 1226, ICE re-detained him at the Mesa Verde ICE Processing Center. The record showed several late or missed check-ins and virtual office visits, although Petitioner had otherwise pursued employment, maintained community relationships, and had no criminal record during his release.

PROCEDURAL HISTORY

Petitioner filed the § 2241 petition and requested emergency injunctive relief while detained by ICE. The court initially ordered the respondents to show cause, then converted the matter to a preliminary-injunction proceeding and granted preliminary relief in part, requiring a substantive parole-revocation hearing before an immigration judge with the government bearing the burden of proof by clear and convincing evidence. Respondents declined to file further merits briefing, and the magistrate judge recommended granting the procedural due process claim, denying the substantive due process claim, and closing the case.

DISPOSITION

other

CASES CITED

- Salcedo Aceros v. Kaiser, No. 25-CV-06924-EMC, 2025 WL 2637503 (N.D. Cal. Sept. 12, 2025)
- Department of Homeland Security v. Thuraissigiam, 591 U.S. 103, 108-10 (2020)
- Jennings v. Rodriguez, 583 U.S. 281, 282, 287, 303, 306 (2018)
- Aroldo Rodriguez Diaz v. Merrick Garland, Diaz v. Garland, 53 F.4th 1189, 1196-97, 1201 (9th Cir. 2022)
- Matter of E-R-M- & L-R-M-, 25 I. & N. Dec. 520, 520 (B.I.A. 2011)
- Matter of Guerra, 24 I. & N. Dec. 37, 40 (B.I.A. 2006)
- Ortega v. Bonnar, 415 F. Supp. 3d 963, 968-69 (N.D. Cal. 2019)
- Panosyan v. Mayorkas, 854 F. App'x 787, 788 (9th Cir. 2021)
- Saravia v. Sessions, 280 F. Supp. 3d 1168, 1197 (N.D. Cal. 2017)
- Y-Z-H-L v. Bostock, 2025 WL 1898025, at *3, *10-*13 (D. Or. July 9, 2025)
- Mata Velasquez v. Kurzdorfer, No. 25-CV-493-LJV, 2025 WL 1953796, at *11 (W.D.N.Y. July 16, 2025)
- Pinchi v. Noem, 792 F. Supp. 3d 1025, 1032 (N.D. Cal. 2025)
- Laing v. Ashcroft, 370 F.3d 994, 997-98 (9th Cir. 2004)
- Castro-Cortez v. INS, 239 F.3d 1037, 1047 (9th Cir. 2001)
- United States v. Pirro, 104 F.3d 297, 299 (9th Cir. 1997)
- McKart v. United States, 395 U.S. 185, 193 (1969)
- El Rescate Legal Services, Inc. v. Executive Office of Immigration Review, 959 F.2d 742, 746 (9th Cir. 1991)
- United States v. Quintero, 995 F.3d 1044, 1051-52 (9th Cir. 2021)
- United States v. Salerno, 481 U.S. 739, 746-47 (1987)
- Mathews v. Eldridge, 424 U.S. 319, 333-35 (1976)
- Armstrong v. Manzo, 380 U.S. 545, 552 (1965)
- Morrissey v. Brewer, 408 U.S. 471, 481 (1972)
- Hernandez v. Sessions, 872 F.3d 976, 990, 994-95 (9th Cir. 2017)
- Doe v. Becerra, 704 F. Supp. 3d 1006, 1020 (N.D. Cal. 2023)
- Doe v. Garland, 109 F.4th 1188 (9th Cir. 2024)

- Mahdawi v. Trump, 781 F. Supp. 3d 214, 232 (D. Vt. 2025)
- Mapp v. Reno, 241 F.3d 221 (2d Cir. 2001)
- Jackson v. Indiana, 406 U.S. 715, 738 (1972)
- Doe v. Becerra, 732 F. Supp. 3d 1071 (N.D. Cal. 2024)
- Espinoza v. Wofford, No. 1:24-cv-01118-SAB-HC, 2025 WL 1556590, at *7 n.7 (E.D. Cal. June 2, 2025)
- Wilkerson v. Wheeler, 772 F.3d 834, 839 (9th Cir. 2014)

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