

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
KENTUCKY, OWENSBORO DIVISION

Sarojben Rajeshkumar Patel v. Jason Woosley, et al.

No. 4:26-cv-5-BJB (W.D. Ky. Feb. 5, 2026) · No. No. 4:26-cv-5-BJB · Decided February 5, 2026

SUMMARY

The United States District Court for the Western District of Kentucky considers Sarojben Rajeshkumar Patel’s habeas petition challenging his detention during removal proceedings. The court discusses the potential preclusive effect of a nationwide class judgment in *Bautista v. Santacruz* concerning detention under 8 U.S.C. §§ 1225 and 1226. The court allows the Government an opportunity to identify another lawful basis for detention or to explain why *Bautista* does not preclude its position, stating that release may otherwise be warranted.

CASE DETAILS

COURT	United States District Court for the Western District of Kentucky, Owensboro Division
JURISDICTION	United States District Court for the Western District of Kentucky, Owensboro Division
DECIDED	February 5, 2026
DOCKET	No. 4:26-cv-5-BJB
DISPOSITION	other
PROCEDURAL POSTURE	Petition for a writ of habeas corpus by an immigration detainee challenging detention without bond under 8 U.S.C. §§ 1225 and 1226. The parties waived a hearing and submitted the matter on briefs. The court ordered supplemental briefing concerning the preclusive effect of a nationwide class judgment in <i>Bautista v. Santacruz</i> and any alternative lawful basis for detention.
STANDARD OF REVIEW	The court considered the habeas petition on the briefs and applied federal claim-preclusion principles to the asserted effect of the <i>Bautista</i> judgment.
PRECEDENTIAL VALUE	unpublished district-court opinion and order
PARTIES	Sarojben Rajeshkumar Patel v. Jason Woosley, Todd Lyons, Kristi Noem, Pamela Bondi, other federal respondents

TOPICS

immigration detention

removal proceedings

res judicata

civil procedure

statutory interpretation

PRACTICE AREAS

immigration law

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remedies

QUESTIONS PRESENTED

1. Whether a final nationwide class judgment declaring the Government's detention policy unlawful may have preclusive effect in a habeas proceeding brought in the district where the petitioner is confined.
2. Whether the Government may collaterally attack the Bautista judgment's jurisdictional and legal conclusions in this case after those issues were fully and fairly litigated and finally determined in Bautista.
3. Whether the Government had identified another lawful basis for detaining Patel after the Bautista judgment rejected the asserted mandatory-detention theory.
4. Whether Patel's motions to expedite should be granted.

HOLDINGS

1. Under binding federal preclusion principles, a jurisdictional issue that was fully and fairly litigated by the parties and finally determined in the rendering court is not subject to collateral attack in a second forum.
2. On the present record, the Government had not supplied a response to Patel's argument that Bautista precluded reliance on § 1225(b)(2), and the court indicated that release would be warranted unless the Government promptly identified another lawful basis for detention or a reason Bautista did not preclude its asserted detention theory.

KEY QUOTATIONS

“A final judgment on the merits of an action precludes the parties or their privies from relitigating issues that were or could have been raised in that action.”

“The principles of res judicata apply to questions of jurisdiction as well as to other issues.”

“if a jurisdictional question was itself ‘fully and fairly litigated by the parties and finally determined in’ the rendering forum, then that question isn’t subject to collateral attack in a second forum.”

FACTUAL BACKGROUND

Sarojben Rajeshkumar Patel, an Indian citizen, entered the United States without permission more than two years before filing her petition and remained in the country without asserting a lawful-status basis in her filings. After ICE changed its policy to treat similarly situated entrants as subject to mandatory detention under 8 U.S.C. § 1225(b)(2), immigration officers arrested Patel and detained her at the Grayson County Jail during removal proceedings. Patel contended that the Bautista nationwide class judgment barred the Government from relying on § 1225(b)(2) to detain her without a bond hearing.

PROCEDURAL HISTORY

Patel was arrested by immigration officers and detained in the Grayson County Jail while removal proceedings proceeded. She filed a habeas petition arguing that the Government lacked statutory authority to detain her without a bond hearing and that *Bautista v. Santacruz* had already declared the Government's detention policy unlawful as to a nationwide class that included her. The Government's response did not address the *Bautista* argument. The court gave the Government an opportunity to file a supplemental response and denied Patel's motions to expedite without prejudice.

DISPOSITION

other

CASES CITED

- *Bautista v. Santacruz*, No. 5:25-cv-1873, 2025 WL 3713987 (C.D. Cal. Dec. 18, 2025)
- *Rumsfeld v. Padilla*, 542 U.S. 426 (2004)
- *Federated Department Stores, Inc. v. Moitie*, 452 U.S. 394, 398 (1981)
- *Treinies v. Sunshine Mining Co.*, 308 U.S. 66, 78 (1939)
- *Durfee v. Duke*, 375 U.S. 106, 116 (1963)
- *Khalil v. President of the United States*, 2026 WL 111933, at *9 (3d Cir. 2026)
- *Trump v. CASA, Inc.*, 606 U.S. 831, 850 (2025)
- *Boumediene v. Bush*, 553 U.S. 723, 740-41 (2008)
- *Browder v. Director, Department of Corrections*, 434 U.S. 257, 271 (1978)

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