

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
MISSOURI, SOUTHERN DIVISION

Sergio Rocha Medina v. Jim Arnott, et al.

Case No. 6:26-cv-3170-MDH · No. 6:26-cv-3170-MDH · Decided April 3, 2026

SUMMARY

The United States District Court for the Western District of Missouri granted Sergio Rocha Medina’s petition for a writ of habeas corpus challenging his immigration detention and termination of parole or deferred action without prior notice or an opportunity for review. Applying the Mathews v. Eldridge procedural due process framework, the court concluded that continued detention without individualized custody review violated the Fifth Amendment. The court ordered Medina’s immediate release and addressed his potential eligibility to seek attorney’s fees under the Equal Access to Justice Act.

CASE DETAILS

COURT	United States District Court for the Western District of Missouri, Southern Division
WRITING FOR THE COURT	Douglas Harpool
JURISDICTION	United States District Court for the Western District of Missouri, Southern Division
DECIDED	April 3, 2026
DOCKET	6:26-cv-3170-MDH
DISPOSITION	writ_granted
PROCEDURAL POSTURE	Petition for a writ of habeas corpus challenging immigration detention and the termination of parole or DACA-related protections without prior written notice or an opportunity for individualized custody review.
STANDARD OF REVIEW	Procedural due process was analyzed under the flexible balancing test of Mathews v. Eldridge, weighing the private interest affected, the risk of erroneous deprivation and value of additional safeguards, and the government's interests and administrative burdens.
PRECEDENTIAL VALUE	unpublished district court order
PARTIES	Sergio Rocha Medina v. Jim Arnott, et al.

TOPICS

immigration detention

procedural due process

due process

remedies

injunctions

PRACTICE AREAS

immigration

constitutional law

civil rights

habeas corpus

civil procedure

QUESTIONS PRESENTED

1. Whether continued immigration detention without prior written notice, a bond hearing, or any individualized custody review violated petitioner's procedural due process rights under the Fifth Amendment.
2. Whether the issuance of a Notice to Appear alone satisfied petitioner's due process rights.
3. Whether the district court should order immediate release rather than a bond hearing when the immigration court had determined that it lacked jurisdiction to conduct a custody hearing and DHS provided no alternative review mechanism.
4. Whether petitioner could pursue attorneys' fees and costs under the Equal Access to Justice Act.

HOLDINGS

1. The continued detention of a long-term DACA recipient without prior notice and without any opportunity for individualized custody review violated procedural due process under the Fifth Amendment.
2. A Notice to Appear alone did not satisfy petitioner's procedural due process rights where it was accompanied by detention without a meaningful opportunity to challenge custody.
3. *Department of Homeland Security v. Thuraissigiam* and *Demore v. Kim* did not foreclose petitioner's due process claim because those decisions addressed materially different circumstances involving admission at or near the border or mandatory detention of a limited class of criminal aliens.
4. Immediate release, rather than a futile order requiring a bond hearing, was the appropriate remedy because the immigration court had determined that it lacked jurisdiction to conduct a bond hearing and DHS provided no alternative mechanism for individualized custody review.

KEY QUOTATIONS

"The fundamental requirement of due process is the opportunity to be heard at a meaningful time and in a meaningful manner." (Discussion)

"This is not minimal process. It is zero process." (Conclusion)

"Respondents' position, that no such process is required, cannot be reconciled with the Fifth Amendment." (Conclusion)

FACTUAL BACKGROUND

Sergio Rocha Medina came to the United States as a child in 1999 and had lived there for approximately twenty-seven years under DACA and other deferred-action protections. He was arrested during a January 31, 2026, traffic stop that resulted in no citation or criminal charge, transferred directly to ICE custody, and detained for nearly two months without a bond hearing or other individualized custody review. The record contained no indication that he posed a danger or flight risk, and respondents did not contend that his DACA status had been revoked before his detention or that he had received a notice of intent to terminate and an opportunity to respond.

PROCEDURAL HISTORY

Petitioner was arrested during a Missouri traffic stop on January 31, 2026, transferred to Immigration and Customs Enforcement custody, and detained without a bond hearing. The Kansas City Immigration Court concluded on March 18, 2026, that it lacked jurisdiction to consider his release. Petitioner filed a verified habeas petition in the Western District of Missouri seeking release or, alternatively, a hearing. After briefing, the district court granted the petition and ordered immediate release, accommodations during return arrangements, and an injunction against relocation outside the court's jurisdiction before compliance.

DISPOSITION

writ_granted

REMAND INSTRUCTIONS

No remand was ordered. Respondents were ordered to immediately release petitioner, make accommodations available until arrangements could be made to return him to the location of arrest or another agreed location, and refrain from relocating him outside the court's jurisdiction before complying with the order.

CASES CITED

- Dep't of Homeland Sec. v. Thuraissigiam, 591 U.S. 103 (2020)
- Demore v. Kim, 538 U.S. 510 (2003)
- Zadvydas v. Davis, 533 U.S. 678, 679 (2001)
- Mathews v. Eldridge, 424 U.S. 319, 333, 335 (1976)
- Hamdi v. Rumsfeld, 542 U.S. 507, 529 (2004)
- Velasco Lopez v. Decker, 978 F.3d 842, 851 (2d Cir. 2020)
- Alfonzo-Mujiuca v. Thompson, Case No. SA-26-CA-00457-XR (W.D. Tex. Mar. 13, 2026)
- Yamataya, 189 U.S. at 101
- Goldberg v. Kelly, 397 U.S. 254, 268 (1970)
- Demore v. Kim, 538 U.S. 510, 531-32 (2003) (Kennedy, J., concurring)
- Preiser v. Rodriguez, 411 U.S. 475, 484 (1973)
- Matter of Yajure Hurtado, 29 I&N Dec. 216, 220 (BIA 2025)
- Comm'r, I.N.S. v. Jean, 496 U.S. 154, 163 (1990)
- Boudin v. Thomas, 732 F.2d 1107, 1114 (2d Cir. 1984)

