

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEVADA

Horacio Garcia Coverrubias v. Leander Holston, et al.

Garcia Coverrubias · No. 2:25-cv-02445-RFB-DJA · Decided December 22, 2025

SUMMARY

The United States District Court for the District of Nevada ordered the respondents to show cause why a writ of habeas corpus under 28 U.S.C. § 2241 should not be granted to an immigration detainee challenging the lawfulness of his detention. The court required respondents to file a notice of appearance, a return certifying the cause of detention, and supporting detention-related documents, and permitted a traverse by the petitioner. The court also directed that the petitioner not be transferred out of the district and ordered service of the petition and order on the respondents and specified government officials.

CASE DETAILS

COURT	United States District Court for the District of Nevada
WRITING FOR THE COURT	Richard F. Boulware, II
JURISDICTION	United States District Court for the District of Nevada
DECIDED	December 22, 2025
DOCKET	2:25-cv-02445-RFB-DJA
DISPOSITION	other
PROCEDURAL POSTURE	Counseled amended petition for a writ of habeas corpus under 28 U.S.C. § 2241 challenging the lawfulness of an immigration detainee's detention; the court issued an order to show cause and interim procedural and protective directives.
STANDARD OF REVIEW	Preliminary review of a habeas petition under 28 U.S.C. § 2243; the court assessed whether the petition established a prima facie case warranting issuance of an order to show cause and interim relief.
PRECEDENTIAL VALUE	Unknown; district court order to show cause with interim relief and no reported citation.
PARTIES	Horacio Garcia Coverrubias v. Leander Holston, et al.

TOPICS

- immigration detention
- federal habeas corpus
- injunctions
- discovery dispute
- removal proceedings

PRACTICE AREAS

immigration detention

federal habeas corpus

civil procedure

injunctions

QUESTIONS PRESENTED

1. Whether the amended § 2241 petition established a prima facie case sufficient to require respondents to show cause why the writ should not issue.
2. Whether the court could require respondents to produce documents reflecting the basis for petitioner's detention under 28 U.S.C. § 2243.
3. Whether interim relief prohibiting respondents from transferring petitioner out of the district was warranted to preserve the court's jurisdiction and maintain the status quo pending resolution of the habeas petition.

HOLDINGS

1. The court found that petitioner had established a prima facie case for relief and ordered respondents to show cause why the writ should not be granted.
2. Because petitioner established a prima facie case for relief, the court required respondents to file with their return documents referenced or relied upon in their responsive pleading and documents reflecting the asserted basis for petitioner's detention, or to state that no such documents existed.
3. Respondents were prohibited from transferring petitioner out of the District of Nevada pending resolution of the habeas petition.

KEY QUOTATIONS

“a district court, confronted by a petition for habeas corpus which establishes a prima facie case for relief, may use or authorize the use of suitable discovery procedures . . . reasonably fashioned to elicit facts necessary to help the court to ‘dispose of the matter as law and justice require’” (at 2)

FACTUAL BACKGROUND

Horacio Garcia Coverrubias is an immigration detainee held at Nevada Southern Detention Center in federal custody. He filed an amended counseled petition under 28 U.S.C. § 2241 challenging the lawfulness of his detention. The court determined preliminarily that his circumstances could warrant relief similar to that ordered in Escobar Salgado and that documents concerning the asserted basis for his arrest, detention, and removal proceedings were necessary to resolve the petition.

PROCEDURAL HISTORY

Petitioner filed an amended § 2241 habeas petition challenging his detention at Nevada Southern Detention Center. After preliminary review, the court found that petitioner could likely demonstrate entitlement to relief similar to relief ordered in Escobar Salgado v. Mattos, found a prima facie case for relief, ordered respondents to show cause and produce detention-related documents, and prohibited transfer of petitioner out of the district pending resolution on the merits.

DISPOSITION

other

CASES CITED

- Escobar Salgado v. Mattos, No. 2:25-CV-01872-RFB-EJY, 2025 WL 3205356 (D. Nev. Nov. 17, 2025)
- Harris v. Nelson, 394 U.S. 286, 290 (1969)
- F.T.C. v. Dean Foods Co., 384 U.S. 597, 604 (1966)
- Al Otro Lado v. Wolf, 952 F.3d 999, 1007 n.6 (9th Cir. 2020)

Retrieved from lawtools.ai · <https://lawtools.ai/cases/federal/united-states-district-court-for-the-district-of-nevada/2025/horacio-garcia-coverrubias-v-leander-holston-et-al-8pbon3c0>