

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF HAWAI‘I

Jun B.X. v. Shikha Dosanj

Civil No. 26-00200 MWJS-RT (D. Haw. Apr. 27, 2026) · No. Civil No. 26-00200 MWJS-RT · Decided April 27, 2026

SUMMARY

The United States District Court for the District of Hawai‘i granted Jun B.X.’s petition for a writ of habeas corpus under 28 U.S.C. § 2241, concluding that his nearly eleven-month immigration detention was unlawfully prolonged under *Zadvydas v. Davis*. The court found no factual or legal distinction from its prior decisions in *Malik v. Dosanj* and *Vu v. Dosanj* and ordered his immediate release under the conditions of his existing supervision order. The court directed the parties to file a status report confirming release and ordered the case closed.

CASE DETAILS

COURT	United States District Court for the District of Hawai‘i
WRITING FOR THE COURT	Micah W.J. Smith
JURISDICTION	United States District Court for the District of Hawai‘i
DECIDED	April 27, 2026
DOCKET	Civil No. 26-00200 MWJS-RT
DISPOSITION	writ_granted
PROCEDURAL POSTURE	Petitioner sought habeas relief under 28 U.S.C. § 2241, alleging that his immigration detention pending removal had become unlawfully prolonged. The district court granted the petition as to Count I and ordered his immediate release under his preexisting order of supervision.
STANDARD OF REVIEW	The court applied the statutory and constitutional detention framework governing detention after a removal order under 8 U.S.C. § 1231(a), including the <i>Zadvydas</i> presumption and burden-shifting approach.
PRECEDENTIAL VALUE	Unknown; district court order, apparently unpublished
PARTIES	Jun B.X., Petitioner v. Shikha Dosanj, in her official capacity as Warden of the Federal Detention Center, Honolulu, Hawai‘i, Respondent

TOPICS

federal habeas corpus

immigration detention

removal proceedings

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PRACTICE AREAS

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QUESTIONS PRESENTED

1. Whether Petitioner’s detention pending execution of a removal order had become unlawfully prolonged under 8 U.S.C. § 1231(a)(6) and *Zadvydas v. Davis*.
2. Whether the government rebutted Petitioner’s showing that there was no significant likelihood of removal in the reasonably foreseeable future.
3. Whether the court should resolve the remaining counts of the habeas petition.

HOLDINGS

1. Under 8 U.S.C. § 1231(a)(6), detention after the statutory removal period is limited to the period reasonably necessary to effectuate removal; once removal is no longer reasonably foreseeable, continued detention is not authorized. Because Petitioner’s nearly eleven-month detention was presumptively unreasonable and the government did not rebut the showing that removal was not significantly likely in the reasonably foreseeable future, the detention was unlawful.
2. The court declined to resolve the remaining counts because granting relief on Count I made resolution of those counts unnecessary.

KEY QUOTATIONS

“once removal is no longer reasonably foreseeable, continued detention is no longer authorized by statute.”
(533 U.S. at 699)

“As there are no factual or legal issues in this case that would distinguish it from this court’s prior orders, IT IS HEREBY ORDERED that the petition for writ of habeas corpus, Dkt. No. 1, is GRANTED as to Count I.”
(at 2)

“The court ORDERS Respondent Shikha Dosanj, the Warden of the FDC, to immediately release Petitioner from detention under the conditions in his preexisting order of supervision.” (at 2)

FACTUAL BACKGROUND

Petitioner Jun B.X. was arrested by immigration authorities on June 3, 2025, had been ordered removed from the United States, and remained in immigration detention for nearly eleven months while the government attempted to effectuate his removal. The government did not identify factual or legal distinctions between this case and the court’s prior habeas decisions in *Malik* and *Vu*, in which prolonged detention was found unlawful because removal was not significantly likely in the reasonably foreseeable future. The government agreed that the case could be decided expeditiously and relied on its arguments from those earlier cases.

PROCEDURAL HISTORY

Petitioner had been arrested by immigration authorities, ordered removed, and detained for nearly eleven months. After the court issued an order to show cause identifying factual and legal similarities to its prior decisions in *Malik* and *Vu*, the government agreed that the case could be resolved expeditiously, conceded that the legal issues were not substantively distinguishable, and relied on arguments made in those cases. The court granted habeas relief on Count I, declined to resolve the remaining counts, ordered release, directed a joint status report, and closed the case.

DISPOSITION

writ_granted

CASES CITED

- *Zadvydas v. Davis*, 533 U.S. 678 (2001)
- *Sergio D.L.S. v. Warden, Cal. City Corr. Ctr.*, No. 1:26-cv-02821-MWJS, 2026 WL 1049713, at *1 n.1 (E.D. Cal. Apr. 17, 2026)
- *Vu v. Dosanj*, Civ. No. 26-00013, 2026 WL 594740 (D. Haw. Mar. 3, 2026)
- *Malik v. Dosanj*, Civ. No. 26-00060, 2026 WL 638483 (D. Haw. Mar. 6, 2026)
- *Daley v. Ceja*, 158 F.4th 1152 (10th Cir. 2025)