

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
FLORIDA, FORT MYERS DIVISION

Mario Jose Castro Diaz v. Miami Field Office Director et al.

Castro Diaz · No. 2:26-cv-00302-SPC-NPM · Decided February 20, 2026

SUMMARY

The United States District Court for the Middle District of Florida grants Mario Jose Castro Diaz’s petition for a writ of habeas corpus. The court holds that his detention is governed by 8 U.S.C. § 1226(a), rather than the mandatory-detention provision of § 1225(b)(2), and that he is entitled to an individualized bond hearing. Respondents must provide a bond hearing within ten days or release him under reasonable conditions.

CASE DETAILS

COURT	United States District Court for the Middle District of Florida, Fort Myers Division
JURISDICTION	United States District Court for the Middle District of Florida
DECIDED	February 20, 2026
DOCKET	2:26-cv-00302-SPC-NPM
DISPOSITION	granted
PROCEDURAL POSTURE	Petition for writ of habeas corpus challenging immigration detention and seeking release or an individualized bond hearing.
STANDARD OF REVIEW	The court reviewed the habeas petition and the statutory basis for detention de novo.
PRECEDENTIAL VALUE	unknown
PARTIES	Mario Jose Castro Diaz v. Miami Field Office Director et al.

TOPICS

- immigration detention
- statutory interpretation
- subject matter jurisdiction
- procedural due process
- remedies

PRACTICE AREAS

- immigration law
- habeas corpus
- federal courts

QUESTIONS PRESENTED

1. Whether 8 U.S.C. § 1252(g) or § 1252(b)(9) deprived the district court of jurisdiction over Castro Diaz's habeas challenge to his detention.
2. Whether Castro Diaz was required to exhaust administrative remedies before seeking habeas relief, and whether exhaustion should be excused as futile.
3. Whether Castro Diaz's detention was governed by the mandatory-detention provision in 8 U.S.C. § 1225(b)(2) or the discretionary-detention provision in § 1226(a).
4. Whether a noncitizen detained under § 1226(a) is entitled to an individualized bond hearing before an immigration judge.

HOLDINGS

1. Sections 1252(g) and 1252(b)(9) do not strip the district court of jurisdiction over this habeas challenge to the statutory basis for Castro Diaz's detention.
2. Administrative exhaustion was excused because pursuing it would have been futile.
3. Castro Diaz's current detention is governed by 8 U.S.C. § 1226(a), not the mandatory-detention provision in § 1225(b)(2), because applying § 1225(b)(2) years after his border apprehension and after his release into the country would be inconsistent with the distinction between noncitizens seeking initial admission and those already inside the United States after entry.
4. A noncitizen detained under 8 U.S.C. § 1226(a) is entitled to an individualized bond hearing before an immigration judge.

KEY QUOTATIONS

“But once an alien enters the country, the legal circumstance changes, for the Due Process Clause applies to all ‘persons’ within the United States, including aliens, whether their presence here is lawful, unlawful, temporary, or permanent.”

“To be clear, subjecting Castro Diaz to mandatory detention under § 1225(b)(2) is unlawful.”

FACTUAL BACKGROUND

Castro Diaz, a Nicaraguan citizen, entered the United States in May 2022 after Border Patrol apprehended and paroled him into the country. DHS later issued a notice to appear, and Castro Diaz had no criminal history, a pending asylum application, and employment in the fishing industry. In February 2026, the Coast Guard arrested him while he was working and transferred him to Border Patrol custody, where he was detained without an opportunity to seek release on bond.

PROCEDURAL HISTORY

Castro Diaz filed a habeas petition challenging his detention without an opportunity for a bond hearing. The government opposed the petition on jurisdictional, exhaustion, and statutory-detention grounds. The district court granted the petition and ordered the respondents to provide an individualized bond hearing before an immigration judge or release Castro Diaz within ten days, then directed the Clerk to enter judgment and close the case.

DISPOSITION

granted

REMAND INSTRUCTIONS

Within ten days, respondents must either bring Castro Diaz before an immigration judge for an individualized bond hearing or release him under reasonable conditions of supervision. If released, respondents must facilitate his transportation from the detention facility by notifying counsel when and where he may be collected.

CASES CITED

- Hinojosa Garcia v. Noem, No. 2:25-cv-879-SPC-NPM, 2025 WL 3041895 (M.D. Fla. Oct. 31, 2025)
- Vasquez Carcamo v. Noem, No. 2:25-cv-922-SPC-NPM, 2025 WL 3119263 (M.D. Fla. Nov. 7, 2025)
- Leng May Ma v. Barber, 357 U.S. 185, 187 (1958)
- Shaughnessy v. United States ex rel. Mezei, 345 U.S. 206 (1953)
- Zadvydas v. Davis, 533 U.S. 678, 693 (2001)
- Jennings v. Rodriguez, 583 U.S. 281, 306 (2018)
- Buenrostro-Mendez v. Bondi, No. 25-20496, 2026 WL 323330 (5th Cir. 2026)
- Castanon-Nava v. U.S. Dep't of Homeland Sec., 161 F.4th 1048, 1060-63 (7th Cir. 2025)