

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
TENNESSEE

Saray Ruiz Linares v. Christopher Bullock

Ruiz Linares · No. 2:26-cv-02205-SHL-atc · Decided April 17, 2026

SUMMARY

The United States District Court for the Western District of Tennessee granted Saray Ruiz Linares’s 28 U.S.C. § 2241 habeas petition challenging her detention without a bond hearing. The court held that 8 U.S.C. § 1226(a), rather than the mandatory-detention provision in § 1225(b)(2)(A), governed her detention because she had been continuously present in the United States for more than three years. The court ordered her immediate release and enjoined the respondent from detaining her under § 1225(b)(2)(A).

CASE DETAILS

COURT	United States District Court for the Western District of Tennessee
WRITING FOR THE COURT	Sheryl H. Lipman
JURISDICTION	United States District Court for the Western District of Tennessee
DECIDED	April 17, 2026
DOCKET	2:26-cv-02205-SHL-atc
DISPOSITION	writ_granted
PROCEDURAL POSTURE	Petition for a writ of habeas corpus under 28 U.S.C. § 2241 challenging immigration detention without a bond hearing.
STANDARD OF REVIEW	The court exercised habeas review under 28 U.S.C. § 2241 and applied prudential exhaustion principles, statutory interpretation based on text and context, and the Mathews v. Eldridge balancing test for due process.
PRECEDENTIAL VALUE	Unpublished federal district court order; persuasive authority only.
PARTIES	Saray Ruiz Linares v. Christopher Bullock, in his official capacity as Field Office Director of Enforcement and Removal Operations, New Orleans Field Office

TOPICS

- immigration detention
- removal proceedings
- statutory interpretation
- procedural due process
- injunctions

PRACTICE AREAS

immigration

civil procedure

constitutional law

habeas corpus

statutory interpretation

QUESTIONS PRESENTED

1. Whether prudential exhaustion of administrative remedies should be required or excused for the § 2241 challenge to detention without a bond hearing.
2. Whether 8 U.S.C. § 1225(b)(2)(A) or § 1226(a) governs the detention of a noncitizen who has been continuously present in the United States for more than two years and was arrested away from the border.
3. Whether detention without a bond hearing violated Ruiz Linares's Fifth Amendment due process rights.
4. Whether the detention violated the Fourth or Eighth Amendments.

HOLDINGS

1. Exhaustion was excused because the petition presented a purely legal question, delay threatened prolonged potentially unlawful detention and hardship, and resort to the administrative process would be futile in light of the BIA's stated position.
2. The detention of an undocumented immigrant who had been continuously present in the United States for more than two years and was arrested away from the border was governed by § 1226(a), not § 1225(b)(2)(A).
3. Ruiz Linares's detention without a bond hearing violated the Fifth Amendment Due Process Clause.
4. The petition was granted; Ruiz Linares was entitled to immediate release, and the respondent was enjoined from detaining her under § 1225(b)(2)(A).

KEY QUOTATIONS

“Thus, given the plain language of §§ 1225 and 1226, the arrest and detention of an illegal immigrant who has been continuously present in the United States for more than two years is governed by § 1226(a), and is subject to the discretionary bond process in that provision.” (Analysis, Part II)

“Respondent is ordered to release Ruiz Linares immediately. Respondent is ENJOINED from pursuing Ruiz Linares’s detention under 8 U.S.C. § 1225(b)(2)(A).” (Conclusion)

FACTUAL BACKGROUND

Ruiz Linares, a Colombian citizen, entered the United States with her parents in February 2022, when she was sixteen. She lived in the United States for more than three years, worked, maintained a vehicle and driver's license, attended church, and had no criminal history. Immigration authorities arrested her on February 10, 2026, and detained her at the West Tennessee Detention Facility without providing a bond hearing under a policy treating her as an applicant for admission subject to mandatory detention under 8 U.S.C. § 1225(b)(2)(A).

PROCEDURAL HISTORY

Ruiz Linares filed a § 2241 petition seeking immediate release from immigration detention. The respondent opposed the petition, arguing principally that administrative remedies had not been exhausted and that mandatory detention under 8 U.S.C. § 1225(b)(2)(A) applied. The court excused exhaustion, held that § 1226(a) governed the detention, concluded that detention without the process required by that statute and the Fifth Amendment was unlawful, granted the petition, ordered immediate release, and enjoined detention under § 1225(b)(2)(A).

DISPOSITION

writ_granted

CASES CITED

- *Rosciszewski v. Adducci*, 983 F. Supp. 2d 910, 913–14 (E.D. Mich. 2013)
- *Godinez-Lopez v. Ladwig*, 2025 WL 3047889, at *1 (W.D. Tenn. Oct. 31, 2025)
- *Lopez-Campos v. Raycraft*, 2025 WL 2496379, at *3
- *McCarthy v. Madigan*, 503 U.S. 140, 144 (1992)
- *Rabi v. Sessions*, No. 18-3249, 2018 U.S. App. LEXIS 19661, at *1–2 (6th Cir. July 16, 2018)
- *Shalala v. Illinois Council on Long Term Care*, 529 U.S. 1, 13 (2000)
- *Contreras-Lomeli v. Raycraft*, No. 25-cv-12826, 2025 U.S. Dist. LEXIS 207162, at *8–9 (E.D. Mich. Oct. 21, 2025)
- *Pizarro Reyes v. Raycraft*, No. 25-CV-12546, 2025 U.S. Dist. LEXIS 175767, at *9 (E.D. Mich. Sept. 9, 2025)
- *Yajure Hurtado*, 29 I. & N. Dec. 216, 220–21 (B.I.A. 2025)
- *Corley v. United States*, 556 U.S. 303, 314 (2009)
- *Hibbs v. Winn*, 542 U.S. 88, 101 (2004)
- *Kentucky v. Biden*, 23 F.4th 585, 603 (6th Cir. 2022)
- *Walters v. Metropolitan Educational Enterprises, Inc.*, 519 U.S. 202, 207 (1997)
- *Jennings v. Rodriguez*, 583 U.S. 281, 287 (2018)
- Antonin Scalia & Bryan A. Garner, *Reading Law: The Interpretation of Legal Texts* 174 (2012)
- *Duncan v. Walker*, 533 U.S. 167, 174 (2001)
- *Dubin v. United States*, 599 U.S. 110, 121 (2023)
- *Shady Grove Orthopedic Assocs., P.A. v. Allstate Insurance Co.*, 559 U.S. 393, 400 (2010)
- *Maldonado v. Olsen*, No. 25-cv-3142, 2025 WL 237441, at *12 (D. Minn. Aug. 15, 2025)
- *Guerra*, 24 I. & N. Dec. 37, 40 (B.I.A. 2006)
- *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001)
- *United States v. Silvestre-Gregorio*, 983 F.3d 848, 852 (6th Cir. 2020)
- *Mathews v. Eldridge*, 424 U.S. 319, 335 (1976)
- *Department of Homeland Security v. Thuraissigiam*, 591 U.S. 103, 139 (2020)

- Villafranca Lara v. Ladwig, No. 26-CV-02079-SHL-tmp, 2026 WL 401204, at *10 (W.D. Tenn. Feb. 12, 2026)

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