

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
TENNESSEE

Jose Luis Jimenez-Mendez v. Christopher Bullock

No. 2:26-cv-02346-SHL-atc · No. 2:26-cv-02346-SHL-atc · Decided April 10, 2026

SUMMARY

The United States District Court for the Western District of Tennessee grants Jose Luis Jimenez-Mendez’s petition for a writ of habeas corpus under 28 U.S.C. § 2241. The court holds that 8 U.S.C. § 1226(a), rather than § 1225(b)(2)(A), governs his detention and that his detention without a bond hearing violated due process. The court orders his immediate release, enjoins detention under § 1225(b)(2)(A), and requires a compliance status report.

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 10, 2026
DOCKET	2:26-cv-02346-SHL-atc
DISPOSITION	other
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 reviewed the habeas claim under 28 U.S.C. § 2241, applied discretionary exhaustion principles, interpreted 8 U.S.C. §§ 1225 and 1226 de novo as a legal question, and applied the Mathews v. Eldridge balancing test to the due process claim.
PRECEDENTIAL VALUE	unpublished district court opinion
PARTIES	Jose Luis Jimenez-Mendez v. Christopher Bullock, Field Office Director of the New Orleans Field Office, U.S. Immigration and Customs Enforcement

TOPICS

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

PRACTICE AREAS

immigration

habeas corpus

constitutional law

civil procedure

statutory interpretation

QUESTIONS PRESENTED

1. Whether the court should excuse prudential exhaustion of administrative remedies before reviewing the § 2241 petition.
2. Whether detention of a noncitizen who entered the United States on parole and lived in the country for more than three years is governed by 8 U.S.C. § 1225(b)(2)(A) or § 1226(a).
3. Whether detention without a bond hearing violated the Fifth Amendment Due Process Clause.
4. Whether the petitioner was entitled to immediate release and injunctive relief.

HOLDINGS

1. The court excused exhaustion because the statutory question was purely legal, delay would impose substantial hardship through potentially unlawful detention, and appeal to the BIA would be futile in light of the BIA's stated position in *Yajure Hurtado*.
2. For an undocumented noncitizen who has been continuously present in the United States for more than three years and is arrested away from the border, detention is governed by 8 U.S.C. § 1226(a), not § 1225(b)(2)(A).
3. Detaining Jimenez-Mendez under the mandatory-detention framework of § 1225(b)(2)(A) without a bond hearing violated the Fifth Amendment Due Process Clause.

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 three 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 Jimenez-Mendez immediately. Respondent is ENJOINED from pursuing Jimenez-Mendez’s detention under 8 U.S.C. § 1225(b)(2)(A).” (Conclusion)

FACTUAL BACKGROUND

Jimenez-Mendez, a citizen of Mexico, entered the United States through the Hidalgo Port of Entry on July 12, 2022, and was paroled into the country. He lived in the United States for more than three years, worked in Memphis, attended church, had community ties, and had no criminal history. ICE apprehended him on November 20, 2025, and detained him at the West Tennessee Detention Facility without providing a bond hearing under a policy treating him as an applicant for admission subject to mandatory detention under § 1225(b)(2)(A).

PROCEDURAL HISTORY

Jimenez-Mendez filed a § 2241 habeas petition on March 30, 2026, challenging his continued detention as an arriving alien without a bond hearing and seeking immediate release. Respondent answered, Jimenez-Mendez

replied, and the district court granted the petition, ordered immediate release, enjoined detention under 8 U.S.C. § 1225(b)(2)(A), and required a compliance status report.

DISPOSITION

other

CASES CITED

- Godinez-Lopez v. Ladwig, No. 25-CV-02962, 2025 WL 3047889, at *1 (W.D. Tenn. Oct. 31, 2025)
- Lopez-Campos v. Raycraft, No. 25-CV-12486, 2025 WL 2496379 (E.D. Mich. Aug. 29, 2025)
- 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. Ill. 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. Metro. Edu. Enters., Inc., 519 U.S. 202, 207 (1997)
- Dubin v. United States, 599 U.S. 110, 121 (2023)
- Jennings v. Rodriguez, 583 U.S. 281, 287 (2018)
- Duncan v. Walker, 533 U.S. 167, 174 (2001)
- Shady Grove Orthopedic Assocs., P.A. v. Allstate Ins. Co., 559 U.S. 393, 400 (2010)
- Maldonado v. Olsen, No. 25-cv-3142, 2025 WL 237441, at *12 (D. Minn. Aug. 15, 2025)
- Mathews v. Eldridge, 424 U.S. 319, 335 (1976)
- United States v. Silvestre-Gregorio, 983 F.3d 848, 852 (6th Cir. 2020)
- Zadvydas v. Davis, 533 U.S. 678, 690 (2001)
- Villafranca Lara v. Ladwig, No. 26-CV-02079-SHL-tmp, 2026 WL 401204, at *10 (W.D. Tenn. Feb. 12, 2026)