

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF  
MICHIGAN, SOUTHERN DIVISION

**Pedro Morales Gonzalez v. Kevin Raycraft et al.**

Morales Gonzalez v. Raycraft · No. 1:26-cv-103 · Decided January 28, 2026

SUMMARY

The United States District Court for the Western District of Michigan conditionally granted Pedro Morales Gonzalez’s petition for a writ of habeas corpus under 28 U.S.C. § 2241. The court held that 8 U.S.C. § 1226(a), rather than the mandatory-detention provision in § 1225(b)(2)(A), governed his detention and concluded that his detention violated the Fifth Amendment’s Due Process Clause. Respondents were ordered to provide a bond hearing within five business days or release him, and certain respondents were dismissed.

CASE DETAILS

|                       |                                                                                                                                                                                                                                                                                 |
|-----------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| COURT                 | United States District Court for the Western District of Michigan, Southern Division                                                                                                                                                                                            |
| WRITING FOR THE COURT | Paul L. Maloney                                                                                                                                                                                                                                                                 |
| JURISDICTION          | United States District Court for the Western District of Michigan, Southern Division                                                                                                                                                                                            |
| DECIDED               | January 28, 2026                                                                                                                                                                                                                                                                |
| DOCKET                | 1:26-cv-103                                                                                                                                                                                                                                                                     |
| DISPOSITION           | writ_granted                                                                                                                                                                                                                                                                    |
| PROCEDURAL POSTURE    | Petitioner, an ICE detainee, filed a counseled petition for a writ of habeas corpus under 28 U.S.C. § 2241 challenging the statutory basis and constitutionality of his detention and seeking release or a bond hearing. The district court conditionally granted the petition. |
| STANDARD OF REVIEW    | The opinion does not state a separately denominated standard of review. It considers whether Petitioner’s custody violated the Constitution or laws of the United States under 28 U.S.C. § 2241.                                                                                |
| PRECEDENTIAL VALUE    | unpublished district court opinion                                                                                                                                                                                                                                              |

TOPICS

- immigration detention
- procedural due process
- statutory interpretation
- remedies
- civil procedure

## PRACTICE AREAS

immigration law

habeas corpus

constitutional law

civil procedure

## QUESTIONS PRESENTED

1. Whether prudential exhaustion of administrative remedies should be enforced against Petitioner's § 2241 challenge to immigration detention.
2. Whether 8 U.S.C. § 1225(b)(2)(A), rather than 8 U.S.C. § 1226(a), governed Petitioner's detention.
3. Whether Petitioner's detention under the mandatory-detention framework of § 1225(b)(2)(A) violated the Fifth Amendment Due Process Clause.
4. Whether the Detroit ICE Field Office Director was the only proper respondent and whether other respondents should be dismissed.

## HOLDINGS

1. The court declined to enforce prudential exhaustion against Petitioner and alternatively held that waiver of exhaustion was appropriate.
2. Section 1226(a), not 8 U.S.C. § 1225(b)(2)(A), governs noncitizens who have resided in the United States and were already within the United States when apprehended and arrested.
3. Petitioner's current detention under the mandatory-detention framework of 8 U.S.C. § 1225(b)(2)(A) violated the Fifth Amendment Due Process Clause.
4. The Detroit ICE Field Office Director was not the only proper respondent. The court retained the Detroit ICE Field Office Director and the Secretary of Homeland Security, while dismissing the Department of Homeland Security, the Attorney General, and the Executive Office for Immigration Review.

## KEY QUOTATIONS

*“The Constitution guarantees that the writ of habeas corpus is “available to every individual detained within the United States.”” (III)*

## FACTUAL BACKGROUND

Petitioner is a native and citizen of Guatemala who entered the United States without inspection in June 2019 and previously lived in Michigan. ICE detained him on December 13, 2025, and issued a notice to appear charging inadmissibility under INA §§ 212(a)(6)(A)(i) and 212(a)(7)(A)(i)(I). He was detained at the North Lake Processing Center and was scheduled for a master calendar hearing in the Detroit Immigration Court.

## PROCEDURAL HISTORY

Petitioner was one of six individuals originally named in a single § 2241 petition. The court severed the petitioners' claims into separate actions, ordered the respondents to show cause, received the respondents' response and Petitioner's reply, and then adjudicated the detention claims. The court conditionally granted habeas relief, retained certain respondents, dismissed others, and ordered a bond hearing or immediate release.

## DISPOSITION

writ\_granted

## REMAND INSTRUCTIONS

Respondents must provide Petitioner with a bond hearing under 8 U.S.C. § 1226(a) within five business days of the opinion and judgment, or immediately release him. Respondents must file a status report within six business days certifying compliance and reporting the hearing date and outcome, bond conditions if granted, or reasons for denial if denied.

## CASES CITED

- Hamdi v. Rumsfeld, 542 U.S. 507, 525 (2004)
- Zadvydas v. Davis, 533 U.S. 678, 687 (2001)
- A. A. R. P. v. Trump, 145 S. Ct. 1364, 1367 (2025)
- Antele Cobix v. Raycraft, No. 1:25-cv-1669, 2025 WL 3562651 (W.D. Mich. Dec. 12, 2025)
- Candela Bastidas v. Noem, No. 1:25-cv-1528, 2025 WL 3562638 (W.D. Mich. Dec. 12, 2025)
- Acuna Sanchez v. Noem, No. 1:25-cv-1442, 2025 WL 3562577 (W.D. Mich. Dec. 12, 2025)
- Penagos Robles v. U.S. Dep't of Homeland Sec., No. 1:25-cv-1578, 2025 WL 3558128 (W.D. Mich. Dec. 12, 2025)

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