

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF  
GEORGIA, COLUMBUS DIVISION

H.J.A.E. v. Warden, Stewart Detention Center, et al.

H.J.A.E. · No. 4:26-cv-150-CDL-CHW · Decided January 27, 2026

SUMMARY

The United States District Court for the Middle District of Georgia ordered respondents to provide the petitioner, a noncitizen detained under federal immigration law, with a bond hearing under 8 U.S.C. § 1226(a)(2) within seven days. The order relied on the court’s prior decisions addressing whether mandatory detention under 8 U.S.C. § 1225(b)(2) applies to certain noncitizens arrested without inspection by an examining immigration officer.

CASE DETAILS

|                       |                                                                                                                                                                                                                             |
|-----------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| COURT                 | United States District Court for the Middle District of Georgia, Columbus Division                                                                                                                                          |
| WRITING FOR THE COURT | Clay D. Land                                                                                                                                                                                                                |
| JURISDICTION          | United States District Court for the Middle District of Georgia, Columbus Division                                                                                                                                          |
| DECIDED               | January 27, 2026                                                                                                                                                                                                            |
| DOCKET                | 4:26-cv-150-CDL-CHW                                                                                                                                                                                                         |
| DISPOSITION           | other                                                                                                                                                                                                                       |
| PROCEDURAL POSTURE    | Petitioner filed an application for habeas corpus relief under 28 U.S.C. § 2241 challenging immigration detention. On preliminary review, the district court ordered Respondents to provide Petitioner with a bond hearing. |
| STANDARD OF REVIEW    | Preliminary habeas-petition review under Rule 4 of the Rules Governing § 2254 Cases, as applied to a § 2241 petition under Rule 1(b).                                                                                       |
| PRECEDENTIAL VALUE    | unpublished district court order; nonprecedential                                                                                                                                                                           |
| PARTIES               | H.J.A.E. v. Warden, Stewart Detention Center, et al.                                                                                                                                                                        |

TOPICS

- immigration detention
- federal habeas corpus
- remedies
- immigration
- civil procedure

## PRACTICE AREAS

immigration detention

federal habeas corpus

immigration

## QUESTIONS PRESENTED

1. Whether, under the rationale of *J.A.M. v. Streeval* and *P.R.S. v. Streeval*, Petitioner was entitled to a bond hearing under 8 U.S.C. § 1226(a)(2).
2. Whether mandatory detention under 8 U.S.C. § 1225(b)(2) authorized continued detention without a bond hearing in the circumstances identified by the Court.

## HOLDINGS

1. Respondents must provide Petitioner with a bond hearing to determine whether Petitioner may be released on bond under § 1226(a)(2) and the applicable regulations.
2. Under the rationale of the Court's prior decisions, mandatory detention under § 1225(b)(2) was not authorized in the circumstances presented; Respondents therefore had to provide a § 1226(a) bond hearing.

## KEY QUOTATIONS

*“Respondents in this action are hereby ORDERED to provide Petitioner with a bond hearing to determine if Petitioner may be released on bond under § 1226(a)(2) and the applicable regulations.”* (Order)

*“Once a bond hearing is provided, Petitioner will have received the remedy that the Court is authorized to order, and Petitioner should file a notice of dismissal.”* (Order)

## FACTUAL BACKGROUND

Petitioner is a noncitizen detained at Stewart Detention Center and sought habeas relief under § 2241. The order treated the case as involving the same detention issues addressed in prior Middle District of Georgia cases concerning noncitizens found unlawfully in the United States and arrested without inspection by an examining immigration officer.

## PROCEDURAL HISTORY

The Court received Petitioner's § 2241 habeas petition on January 26, 2026. Applying Rule 4 of the Rules Governing § 2254 Cases pursuant to Rule 1(b), the Court determined that the petition appeared to raise issues addressed in *J.A.M. v. Streeval* and *P.R.S. v. Streeval*, and ordered a bond hearing within seven days.

## DISPOSITION

other

## REMAND INSTRUCTIONS

Respondents were ordered to provide Petitioner a bond hearing within seven days of the order. After the hearing, Petitioner was directed to file a notice of dismissal if the ordered remedy had been provided. If Respondents filed a good-faith motion asserting that J.A.M. and P.R.S. did not apply, the order would be stayed pending resolution of that motion.

#### CASES CITED

- J.A.M. v. Streeval, No. 4:25-CV-342-CDL, 2025 WL 3050094 (M.D. Ga. Nov. 1, 2025)
- P.R.S. v. Streeval, No. 4:25-cv-330-CDL, 2025 WL 3269947 (M.D. Ga. Nov. 24, 2025)

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