

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
TEXAS, SAN ANTONIO DIVISION

Jennifher Pahola Umanzor Maldonado v. Todd M. Lyons, Acting
Director of U.S. ICE, et al.

No. 5:26-CV-0112-JKP (W.D. Tex. Jan. 20, 2026) · No. No. 5:26-CV-0112-JKP · Decided January 20, 2026

SUMMARY

The United States District Court for the Western District of Texas granted Jennifher Pahola Umanzor Maldonado’s petition for a writ of habeas corpus under 28 U.S.C. § 2241. The court held that the respondents could not detain her under 8 U.S.C. § 1225(b) under the circumstances presented and ordered her release under appropriate conditions. The court also addressed its jurisdiction to preserve existing conditions pending resolution of the habeas petition and dissolved the stay upon entry and closing of the case.

CASE DETAILS

COURT	United States District Court for the Western District of Texas, San Antonio Division
WRITING FOR THE COURT	Jason K. Pulliam
JURISDICTION	U.S. District Court for the Western District of Texas, San Antonio Division
DECIDED	January 20, 2026
DOCKET	No. 5:26-CV-0112-JKP
DISPOSITION	writ_granted
PROCEDURAL POSTURE	Petitioner sought habeas relief under 28 U.S.C. § 2241 challenging her immigration detention. After reviewing the petition, abbreviated responses, evidence, and applicable law, the district court granted the petition and ordered her release under appropriate conditions.
STANDARD OF REVIEW	The court independently determined its jurisdiction and reviewed the habeas petition, briefing, evidence, and applicable law; no separate formal standard of review was stated.
PRECEDENTIAL VALUE	unpublished district-court order; persuasive value only
PARTIES	Jennifher Pahola Umanzor Maldonado v. Todd M. Lyons, Acting Director of U.S. ICE, et al.

TOPICS

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QUESTIONS PRESENTED

1. Whether the district court had jurisdiction to consider the § 2241 habeas petition challenging Petitioner's immigration detention.
2. Whether Respondents could detain Petitioner under 8 U.S.C. § 1225(b)(1) or § 1225(b)(2) under the facts presented.
3. Whether the court's service order and stay preserving Petitioner's existing conditions exceeded the court's jurisdiction.
4. Whether the Equal Access to Justice Act permits an award of fees in this habeas proceeding.
5. Whether *Maldonado Bautista v. Santacruz* precluded habeas relief.

HOLDINGS

1. The district court had jurisdiction to consider the arguments presented in the § 2241 habeas petition.
2. Under the facts presented, Respondents could not detain Petitioner under either 8 U.S.C. § 1225(b)(1) or § 1225(b)(2), and her detention was unlawful.
3. The court had inherent power to issue a stay preserving existing conditions while determining its authority to grant injunctive relief, although the stay would be dissolved upon entry of the order and closing of the case.
4. Fees under the Equal Access to Justice Act, 28 U.S.C. § 2412, were not available in this habeas corpus proceeding.
5. *Maldonado Bautista v. Santacruz* did not preclude granting habeas relief at that time.

KEY QUOTATIONS

“the power to preserve existing conditions while it was determining its own authority to grant injunctive relief.”

FACTUAL BACKGROUND

Petitioner was detained by immigration authorities under 8 U.S.C. § 1225(b)(1) or § 1225(b)(2). She had completed removal proceedings, reserved appeal, and had not yet appealed her removal order, making the order non-final. Respondents maintained that the detention was authorized, challenged the court's jurisdiction, and argued that the court's service order improperly stayed removal or transfer.

PROCEDURAL HISTORY

Maldonado filed a petition for a writ of habeas corpus under 28 U.S.C. § 2241. Respondents filed abbreviated responses preserving their legal arguments and incorporating filings from related cases. The court declined to await a reply, followed its prior reasoning in materially similar detention cases, granted habeas relief, ordered release by January 22, 2026, and required a status report; the court stated that a final judgment would issue separately.

DISPOSITION

writ_granted

REMAND INSTRUCTIONS

No remand. Respondents were ordered to release Petitioner under appropriate conditions by January 22, 2026; notify Petitioner's counsel of the exact location and time of release; refrain from removing or transferring Petitioner under the present detention; follow all applicable procedures, including a bond hearing, if Petitioner is re-detained under 8 U.S.C. § 1226; and file a status report confirming release by January 23, 2026.

CASES CITED

- Diaz Perez v. Thompson, No. 5:25-CV-1664-JKP, 2025 WL 3654333 (W.D. Tex. Dec. 15, 2025)
- Davila Mercado v. Lyons, No. 5:25-CV-1623-JKP, 2025 WL 3654268 (W.D. Tex. Dec. 11, 2025)
- Orellana v. U.S. Dep't of Homeland Sec., No. 5:25-CV-1028-JKP, 2025 WL 3471569 (W.D. Tex. Nov. 24, 2025)
- Gonzalez v. Ortega, No. 5:25-CV-1156-JKP, 2025 WL 3471571 (W.D. Tex. Nov. 24, 2025)
- Trujillo v. Noem, No. 5:25-CV-1266-JKP, 2025 WL 3471572 (W.D. Tex. Nov. 24, 2025)
- Granados v. Noem, No. SA-25-CA-01464-XR, 2025 WL 3296314 (W.D. Tex. Nov. 26, 2025)
- Tinoco Pineda v. Noem, No. SA-25-CA-01518-XR, 2025 WL
- Reyes-Lopez v. Bondi, No. 5:25-CV-1800-JKP, 2026 WL 94653, at *1 (W.D. Tex. Jan. 6, 2026)
- Montilla De Diaz v. Lyons, No. 5:25-CV-1809-JKP, 2026 WL 94645, at *1 (W.D. Tex. Jan. 6, 2026)
- Imran v. Harper, No. 25-30370, 2026 WL 93131, at *1 (5th Cir. Jan. 13, 2026)
- United States v. United Mine Workers of Am., 330 U.S. 258, 293 (1947)
- Brownback v. King, 592 U.S. 209, 218–19 (2021)
- Santiago v. Noem, No. 3-25-CV-361-KC, 2025 WL 2606118, at *2–3 (W.D. Tex. Sept. 9, 2025)
- Maldonado Bautista v. Santacruz, No. 5:25-CV-01873-SSS-BFM (C.D. Cal. 2025)