

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
FLORIDA

Samad Mamirovich Ernazarov v. Allan Crosby, Jail Administrator,
and Liberty County Jail

Ernazarov · No. 4:26-cv-170-AW-MAF · Decided June 26, 2026

SUMMARY

The United States District Court for the Northern District of Florida adopted a magistrate judge’s report and recommendation in a 28 U.S.C. § 2241 habeas case concerning an immigration detainee’s entitlement to a bond hearing or release. Relying on Eleventh Circuit precedent, the court ordered the government to provide Petitioner with an individualized bond hearing under 8 U.S.C. § 1226(a) within seven days or release him. The court also denied the motion to expedite as moot and directed the clerk to close the case.

CASE DETAILS

COURT	United States District Court for the Northern District of Florida
WRITING FOR THE COURT	Allen Winsor
JURISDICTION	United States District Court for the Northern District of Florida
DECIDED	June 26, 2026
DOCKET	4:26-cv-170-AW-MAF
DISPOSITION	other
PROCEDURAL POSTURE	Petition for a writ of habeas corpus under 28 U.S.C. § 2241 seeking a bond hearing or release; the district court adopted the magistrate judge’s report and recommendation and granted relief in part.
STANDARD OF REVIEW	Because neither party objected to the report and recommendation, the court reviewed it for plain error.
PRECEDENTIAL VALUE	unpublished district court order
PARTIES	Samad Mamirovich Ernazarov v. Allan Crosby, Jail Administrator, Liberty County Jail

TOPICS

- immigration detention
- removal proceedings
- immigration
- statutory interpretation
- civil procedure

PRACTICE AREAS

immigration law

federal habeas corpus

immigration detention

QUESTIONS PRESENTED

1. Whether Ernazarov was entitled to an individualized bond hearing under 8 U.S.C. § 1226(a) or release while his immigration proceedings continued.
2. Whether the entry-fiction doctrine required treating Ernazarov as an applicant for admission at the border despite his apprehension in the interior after the expiration of parole.

HOLDINGS

1. The government must provide Ernazarov with an individualized bond hearing pursuant to 8 U.S.C. § 1226(a) within seven days or release him.
2. The government did not clearly show that the entry-fiction doctrine applied to Ernazarov under these circumstances; therefore, the doctrine did not prevent the court from ordering a § 1226(a) bond hearing or release.

KEY QUOTATIONS

“The Petition (ECF No. 1) is GRANTED in part. Within seven days, the government must provide the bond hearing or release Petitioner.”

FACTUAL BACKGROUND

Ernazarov, an unadmitted noncitizen apprehended in the interior of the United States, was detained during immigration proceedings. He sought an individualized bond hearing or release under § 2241. The government invoked the entry-fiction doctrine to argue that he should be treated as an individual stopped at the border, but the court found that the government had not clearly shown the doctrine applied under the circumstances.

PROCEDURAL HISTORY

Ernazarov filed a § 2241 habeas petition seeking a bond hearing or release. The magistrate judge recommended ordering the government to provide an individualized bond hearing under 8 U.S.C. § 1226(a) within seven days or release Ernazarov. Neither party objected, and the district court adopted the report and recommendation, granted the petition in part, denied the motion to expedite as moot, and closed the file.

DISPOSITION

other

CASES CITED

- Hernandez Alvarez v. Warden, 175 F.4th 1258, 1261 (11th Cir. 2026)
- Evans v. Ga. Reg'l Hosp., 850 F.3d 1248, 1257 (11th Cir. 2017)
- Cabrera Martinez v. Marich, 816 F. Supp. 3d 356, 368-69 (W.D.N.Y. 2025)

- Leng May Ma
- Torres v. U.S. Dep't of Homeland Security, 2026 WL 947955, at *5 (M.D. Fla. Apr. 8, 2026)

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