

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

Angel Jose Becerra-Lugo, proceeding by his next friend Angel De
Jesus Beccera Lugo v. Warden, North Lake Correctional Facility et
al.

Becerra-Lugo v. Warden, North Lake Correctional Facility · No. 1:26-cv-536 · Decided March 12, 2026

SUMMARY

The United States District Court for the Western District of Michigan conditionally granted an ICE detainee's petition for a writ of habeas corpus under 28 U.S.C. § 2241. The court held that detention was governed by 8 U.S.C. § 1226(a), rather than mandatory detention under § 1225(b)(2)(A), and that the existing detention framework violated the petitioner's Fifth Amendment due process rights. Respondents were ordered to provide a bond hearing within five business days or release the petitioner, and the court dismissed the Department of Homeland Security and ICE as respondents while retaining the Detroit ICE Field Office Director.

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	March 12, 2026
DOCKET	1:26-cv-536
DISPOSITION	writ_granted
PROCEDURAL POSTURE	Petition for a writ of habeas corpus under 28 U.S.C. § 2241 challenging immigration detention; the district court conditionally granted the petition.
STANDARD OF REVIEW	The court reviewed the § 2241 detention challenge and related jurisdictional and statutory questions de novo; no separate standard of review was expressly stated.
PRECEDENTIAL VALUE	nonprecedential

PARTIES

Angel Jose Becerra-Lugo v. Warden, North Lake Correctional Facility,
Detroit ICE Field Office Director, Department of Homeland Security,
United States Immigration and Customs Enforcement

TOPICS

immigration detention

removal proceedings

procedural due process

civil procedure

immigration

PRACTICE AREAS

immigration law

habeas corpus

constitutional law

civil procedure

QUESTIONS PRESENTED

1. Whether Angel De Jesus Beccera Lugo satisfied the requirements to proceed as Petitioner's next friend.
2. Whether prudential exhaustion of administrative remedies should be required or waived before considering Petitioner's § 2241 detention challenge.
3. Whether 8 U.S.C. § 1226(a), rather than the mandatory-detention provision in 8 U.S.C. § 1225(b)(2)(A), governs the detention of a noncitizen who had resided in the United States and was apprehended after being present in the country.
4. Whether Petitioner's detention under § 1225(b)(2)(A) violated the Fifth Amendment Due Process Clause.
5. Whether the Detroit ICE Field Office Director was the proper respondent and whether the Department of Homeland Security and ICE should be dismissed as respondents.

HOLDINGS

1. A putative next friend may proceed in a habeas action when the detainee is unable to litigate personally because of inaccessibility, incompetence, or another disability, and the putative next friend has a significant relationship with and is dedicated to the detainee's best interests. The court held that Petitioner's detention and limited legal resources made the justice system inaccessible and that his brother satisfied the relationship and dedication requirements.
2. The court declined to enforce prudential exhaustion of administrative remedies and alternatively held that waiver of exhaustion was appropriate.
3. Section 1226(a), rather than 8 U.S.C. § 1225(b)(2)(A), governs the detention of a noncitizen who had resided in the United States and was already present in the country when apprehended and arrested.
4. Petitioner's continued detention under the mandatory-detention framework of § 1225(b)(2)(A) violated the Fifth Amendment Due Process Clause.
5. The court retained the Detroit ICE Field Office Director as a respondent and dismissed the Department of Homeland Security and United States Immigration and Customs Enforcement as respondents.

FACTUAL BACKGROUND

Petitioner, a Venezuelan citizen, entered the United States through the Hidalgo, Texas, Port of Entry on March 3, 2024, was charged as inadmissible for lacking required immigration documents, and was released into the United States. He later received employment authorization and had no criminal history. ICE arrested him on September 19, 2025, while he was traveling to work, and he remained detained at the North Lake Processing Center while removal proceedings were pending. His brother sought to litigate the habeas petition as next friend because Petitioner was detained with limited access to legal resources.

PROCEDURAL HISTORY

Petitioner, proceeding through his brother as next friend, filed a § 2241 petition challenging the lawfulness of his ICE detention and requesting release or a bond hearing. The court ordered respondents to show cause, respondents filed a response, and the court permitted the brother to proceed as next friend. The court conditionally granted habeas relief, ordered a bond hearing or immediate release, required a compliance status report, and dismissed the Department of Homeland Security and ICE as respondents.

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, with notice to the parties as soon as practicable and no later than 24 hours before the hearing, or immediately release Petitioner. Respondents must file a status report within six business days certifying compliance and reporting the hearing's outcome and any bond conditions or reasons for denial.

CASES CITED

- Whitmore v. Arkansas, 495 U.S. 149, 155–56, 163–64 (1990)
- West v. Bell, 242 F.3d 338, 341 (6th Cir. 2001)
- Franklin v. Francis, 144 F.3d 429, 432 (6th Cir. 1998)
- Wilson v. Lane, 870 F.2d 1250, 1253 (7th Cir. 1989)
- Weber v. Garza, 570 F.2d 511, 513–14 (5th Cir. 1978)
- 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)
- Buenrostro-Mendez v. Bondi, 166 F.4th 494 (5th Cir. 2026)

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