

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
KENTUCKY, OWENSBORO DIVISION

Navneesh Kumar v. Mike Lewis, et al.

Kumar · No. 4:26-cv-131-RGJ · Decided March 18, 2026

SUMMARY

The United States District Court for the Western District of Kentucky granted Navneesh Kumar’s petition for a writ of habeas corpus. The court held that 8 U.S.C. § 1226, rather than § 1225(b)(2), governed Kumar’s detention and that his continued detention without an individualized bond hearing violated due process. The court ordered Kumar’s immediate release and required a bond hearing before a neutral immigration judge before any re-detention.

CASE DETAILS

COURT	United States District Court for the Western District of Kentucky, Owensboro Division
JURISDICTION	United States District Court for the Western District of Kentucky, Owensboro Division
DECIDED	March 18, 2026
DOCKET	4:26-cv-131-RGJ
DISPOSITION	writ_granted
PROCEDURAL POSTURE	Petitioner sought a writ of habeas corpus challenging his immigration detention under 8 U.S.C. §§ 1225 and 1226 and alleging violation of the Fifth Amendment Due Process Clause.
STANDARD OF REVIEW	The court applied the three-factor balancing test from Mathews v. Eldridge to determine whether continued civil detention violated due process.
PRECEDENTIAL VALUE	unpublished district court memorandum opinion; persuasive but not binding outside the case
PARTIES	Navneesh Kumar v. Mike Lewis, et al.

TOPICS

- immigration detention
- federal habeas corpus
- procedural due process
- removal proceedings
- immigration

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether Kumar's detention was governed by 8 U.S.C. § 1225(b)(2)(A) or 8 U.S.C. § 1226.
2. Whether Kumar's continued detention without an individualized merits bond hearing violated the Fifth Amendment Due Process Clause and the Immigration and Nationality Act.
3. Whether the proper habeas remedy was immediate release followed by a bond hearing before a neutral immigration judge.

HOLDINGS

1. Section 1226, rather than Section 1225(b)(2), governed Kumar's detention because he was not seeking admission, had been released into the interior after issuance of a Notice to Appear, and was arrested pursuant to an I-200 warrant whose authority arose under Section 1226.
2. Kumar's continued detention violated the Fifth Amendment Due Process Clause and the INA because he had been detained under Section 1226 without a merits bond hearing before a neutral immigration judge.
3. The proper remedy was immediate release from the unlawful detention and provision of a bond hearing on the merits before a neutral immigration judge before any re-detention.

KEY QUOTATIONS

“Freedom from imprisonment—from government custody, detention, or other forms of physical restraint—lies at the heart of the very liberty that [the Due Process Clause] protects.”

“The current detention of Kumar is in violation of the Due Process Clause and the INA.”

“Habeas has traditionally been a means to secure release from unlawful detention.”

FACTUAL BACKGROUND

Navneesh Kumar, a 19-year-old citizen of India, entered the United States without inspection in 2023 and was placed in removal proceedings after being apprehended near Lukeville, Arizona. He was released into the United States, primarily resided in Indiana, and had a pending asylum application. ICE detained him on March 3, 2026, during a required check-in and issued an I-200 arrest warrant. He had not received a merits bond hearing, and the government did not demonstrate that he posed a flight risk or danger to the community.

PROCEDURAL HISTORY

Kumar filed a habeas petition challenging his detention after ICE detained him during a required check-in and transferred him to Hopkins County Jail. The United States responded and relied on briefing filed in related Sixth Circuit cases; Kumar replied, and the parties agreed that no evidentiary hearing was necessary. The court granted the petition, ordered Kumar's immediate release, and required a bond hearing before a neutral immigration judge before any re-detention.

DISPOSITION

REMAND INSTRUCTIONS

The United States must release Kumar immediately, provide a bond hearing before a neutral immigration judge pursuant to Section 1226 before any re-detention, and certify compliance on the docket by March 19, 2026.

CASES CITED

- Edahi v. Lewis, 2025 WL 3466682, at *2-*3, *5-*13 (W.D. Ky. Nov. 27, 2025)
- Vicen v. Lewis, 2026 WL 541171, at *2-*9 (W.D. Ky. Feb. 26, 2026)
- A.A.R.P. v. Trump, 605 U.S. 91, 94 (2025)
- Mathews v. Eldridge, 424 U.S. 319, 335 (1976)
- Hamdi v. Rumsfeld, 542 U.S. 507, 529 (2004)
- Zadvydas v. Davis, 533 U.S. 678, 690 (2001)
- Martinez v. Noem, 2025 WL 2598379, at *2 (W.D. Tex. Sep. 8, 2025)
- Munoz Materano, 2025 WL 2630826, at *15
- Sampiao, 2025 WL 2607924, at *12
- Hyppolite v. Noem, 2025 WL 2829511, at *15-*16 (E.D.N.Y. Oct. 6, 2025)
- Günaydin v. Trump, 2025 WL 1459154, at *10 (D. Minn. May 21, 2025)
- Loper Bright Enterprises v. Raimondo, 603 U.S. 369, 413 (2024)
- Patel, 2025 WL 2823607, at *6
- Beltran Barrera, 2025 WL 2690565, at *7
- Roble v. Bondi, 2025 WL 2443453, at *5 (D. Minn. Aug. 25, 2025)
- Thuraissigiam, 591 U.S. at 107
- Matter of Guerra, 24 I. & N. Dec. 37, 40 (BIA 2006)
- Lopez-Arevelo v. Ripa, 2025 WL 2691828, at *12 (W.D. Tex. Sep. 22, 2025)
- Black v. Decker, 103 F.4th 133, 149-150 (2d Cir. 2024)
- Maldonado, 2025 WL 2968042, at *9-*10
- Morales-Martinez v. Raycraft, 2025 WL 3124695, at *7 (E.D. Mich. Nov. 7, 2025)
- Lopez-Campos v. Raycraft, Case No. 25-1965 (6th Cir. Oct. 27, 2025)
- Alvarez v. Noem, Case No. 25-1969 (6th Cir. Oct. 27, 2025)
- Contreras-Cervantes v. Raycraft, Case No. 25-1978 (6th Cir. Oct. 28, 2025)
- Pizarro Reyes v. Raycraft, Case No. 25-1982 (6th Cir. Oct. 29, 2025)