

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

Lenar Johanan Lopez Lopez v. Kevin Raycraft, et al.

Lopez · No. 2:25-cv-13802 · Decided December 22, 2025

SUMMARY

The United States District Court for the Eastern District of Michigan grants in part and denies in part Lenar Johanan Lopez Lopez’s petition for a writ of habeas corpus under 28 U.S.C. § 2241. The court holds that Lopez’s detention is governed by the discretionary detention framework of 8 U.S.C. § 1226(a), rather than the mandatory detention provision in § 1225(b)(2)(A), and orders an individualized bond hearing or release. The court also declines to require administrative exhaustion, retains certain respondents, and dismisses others.

CASE DETAILS

COURT	United States District Court for the Eastern District of Michigan, Southern Division
WRITING FOR THE COURT	Jonathan J.C. Grey
JURISDICTION	United States District Court for the Eastern District of Michigan, Southern Division
DECIDED	December 22, 2025
DOCKET	2:25-cv-13802
DISPOSITION	other
PROCEDURAL POSTURE	Petition for a writ of habeas corpus under 28 U.S.C. § 2241 challenging immigration detention under the Immigration and Nationality Act and the Fifth Amendment Due Process Clause.
STANDARD OF REVIEW	De novo consideration of the statutory and constitutional habeas claims; the court independently interpreted the INA and applied the Mathews v. Eldridge due-process balancing test.
PRECEDENTIAL VALUE	nonprecedential district court opinion
PARTIES	Lenar Johanan Lopez Lopez v. Kevin Raycraft, Angela Dunbar, Kristi Noem, United States Department of Homeland Security, Pamela Bondi, Executive Office for Immigration Review

TOPICS

immigration detention

federal habeas corpus

statutory interpretation

procedural due process

due process

PRACTICE AREAS

immigration law

federal habeas corpus

constitutional law

civil procedure

QUESTIONS PRESENTED

1. Whether Raycraft, Dunbar, and Bondi were proper respondents and whether the Eastern District of Michigan had habeas jurisdiction without transferring the case to the Western District of Michigan.
2. Whether prudential exhaustion of administrative remedies was required before Lopez could pursue his § 2241 habeas petition.
3. Whether Lopez's detention was governed by the mandatory-detention provision in 8 U.S.C. § 1225(b)(2)(A) or the discretionary detention framework in § 1226(a).
4. Whether detention without an individualized bond hearing violated Lopez's Fifth Amendment due-process rights.
5. Whether Lopez was entitled to immediate release or, instead, an individualized bond hearing.

HOLDINGS

1. Raycraft, Dunbar, and Bondi were properly named respondents, while Noem, DHS, and EOIR were dismissed; because Raycraft remained a proper respondent, transfer to the Western District of Michigan was unnecessary.
2. Prudential exhaustion was unnecessary and was waived because the issues were purely legal, administrative review was futile, the agency had predetermined the disputed detention issue, and delay would cause hardship.
3. Section 1226(a), not the mandatory-detention provision in § 1225(b)(2)(A), governed Lopez's detention because he was apprehended inside the United States while removal proceedings were pending and was not an applicant for admission actively seeking admission before an examining immigration officer.
4. Detaining Lopez without an individualized bond hearing violated the Fifth Amendment Due Process Clause.

KEY QUOTATIONS

“As § 1225(b)(2)(A) applies only to those noncitizens who are actively “seeking admission” to the United States, it cannot, according to its ordinary meaning, apply to [petitioner], because he has already been residing in the United States for several years.” (Section IV.D.i)

“If § 1225(b)(2) already mandated detention of any alien who has not been admitted, regardless of how long they have been here, then adding § 1226(c)(1)(E) to the statutory scheme was pointless” (Section IV.D.ii)

“Therefore, without first evaluating [Lopez’s] risk of flight or dangerousness, his detention is a violation of his due process rights.” (Section IV.E)

FACTUAL BACKGROUND

Lopez is an 18-year-old citizen of Nicaragua who allegedly entered the United States without inspection as an unaccompanied child on February 2, 2024. After living in Tennessee and later Detroit, he was arrested by ICE at a construction site in Troy, Michigan, on September 29, 2025, and detained at North Lake Correctional Facility. He had no criminal history, was employed in construction, and was charged with inadmissibility under 8 U.S.C. § 1182(a)(6)(A)(i). An immigration judge allegedly indicated that the judge lacked jurisdiction to grant him bond, and Lopez received no individualized bond hearing.

PROCEDURAL HISTORY

Lopez filed a § 2241 habeas petition on November 26, 2025, while detained by ICE at North Lake Correctional Facility and facing removal proceedings. The parties briefed the petition, and the court held a hearing on December 17, 2025, at which it issued a bench order granting relief in part and denying relief in part. The court dismissed several respondents, declined to transfer the case to the Western District of Michigan, waived prudential exhaustion, and ordered an individualized bond hearing or release while denying immediate release without prejudice.

DISPOSITION

other

CASES CITED

- Lopez-Campos v. Raycraft, 797 F. Supp. 3d 771, 776-785 (E.D. Mich. 2025)
- Aguilar v. Dunbar, No. 2:25-cv-12831, 2025 WL 3281540, at *2-*7 (E.D. Mich. Nov. 13, 2025)
- Quintero-Martinez v. Raycraft, No. 2:25-cv-13536, ECF No. 9 (E.D. Mich. Nov. 19, 2025)
- Rumsfeld v. Padilla, 542 U.S. 426, 435, 438-443 (2004)
- Roman v. Ashcroft, 340 F.3d 314, 320, 325-327 (6th Cir. 2003)
- Romero Garcia v. Raycraft, No. 25-cv-13407, 2025 WL 3252286, at *2, *5 (E.D. Mich. Nov. 21, 2025)
- Velasco-Sanchez v. Raycraft, No. 2:25-cv-13730, 2025 WL 3553672, at *2, *5 (E.D. Mich. Dec. 11, 2025)
- Bautista v. Santacruz, No. 5:25-cv-01873, 2025 WL 3288403 (C.D. Cal. Nov. 25, 2025)
- McCarthy v. Madigan, 503 U.S. 140, 144, 148 (1992)
- Shearson v. Holder, 725 F.3d 588, 593-594 (6th Cir. 2013)
- Island Creek Coal Co. v. Bryan, 937 F.3d 738, 747 (6th Cir. 2019)
- Shweika v. Department of Homeland Security, No. 1:06-cv-11781, 2015 WL 6541689, at *12 (E.D. Mich. Oct. 29, 2015)
- Morales-Martinez v. Raycraft, No. 25-cv-13303, 2025 WL 3124695, at *2 (E.D. Mich. Nov. 7, 2025)
- Shalala v. Illinois Council on Long Term Care, Inc., 529 U.S. 1, 13 (2000)
- Shawnee Coal Co. v. Andrus, 661 F.2d 1083, 1093 (6th Cir. 1981)
- Cooper v. Zych, No. 09-CV-11620, 2009 WL 2711957, at *2 (E.D. Mich. Aug. 25, 2009)
- Sullivan v. Zebley, 493 U.S. 521, 530 n.9 (1990)

- Loper Bright Enterprises v. Raimondo, 603 U.S. 369, 394 (2024)
- Rodriguez v. Bostock, 779 F. Supp. 3d 1239, 1245 (W.D. Wash. 2025)
- Sterkaj v. Gonzales, 439 F.3d 273, 279 (6th Cir. 2006)
- Bangura v. Hansen, 434 F.3d 487, 494 (6th Cir. 2006)
- Corley v. United States, 556 U.S. 303, 314 (2009)
- Kentucky v. Biden, 23 F.4th 585, 603 (6th Cir. 2022)
- Bautista v. Santacruz, 2025 WL 3289861, at *8-*11 (C.D. Cal. 2025)
- Dubin v. United States, 599 U.S. 110, 120-121 (2023)
- Digital Realty Trust, Inc. v. Somers, 583 U.S. 149, 160 (2018)
- United States ex rel. Polansky v. Executive Health Resources, Inc., 599 U.S. 419, 431 (2023)
- Lopez Benitez v. Francis, 795 F. Supp. 3d 475, 489 (S.D.N.Y. 2025)
- Jennings v. Rodriguez, 583 U.S. 281, 287-289 (2018)
- United Savings Association of Texas v. Timbers of Inwood Forest Associates, Ltd., 484 U.S. 365, 371 (1988)
- Roberts v. Sea-Land Services, Inc., 566 U.S. 93, 101 (2012)
- Utility Air Regulatory Group v. EPA, 573 U.S. 302, 321 (2014)
- Robinson v. Shell Oil Co., 519 U.S. 337, 341 (1997)
- Pulsifer v. United States, 601 U.S. 124, 143 (2024)
- Stone v. INS, 514 U.S. 386, 397 (1995)
- Zadvydas v. Davis, 533 U.S. 678, 693 (2001)
- Mathews v. Eldridge, 424 U.S. 319, 335 (1976)