

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLORADO

Sanchez-Jimenez v. Lyons

Sanchez-Jimenez · No. 1:26-cv-01499-PAB · Decided April 17, 2026

SUMMARY

The United States District Court for the District of Colorado granted Lennin Sanchez-Jimenez’s petition for a writ of habeas corpus, holding that his immigration detention was governed by 8 U.S.C. § 1226(a) rather than § 1225. The court ordered respondents to provide a bond hearing within seven days, with the government bearing the burden of justifying continued detention. The court denied petitioner’s motion for default judgment.

CASE DETAILS

COURT	United States District Court for the District of Colorado
WRITING FOR THE COURT	Philip A. Brimmer
JURISDICTION	United States District Court for the District of Colorado
DECIDED	April 17, 2026
DOCKET	1:26-cv-01499-PAB
DISPOSITION	other
PROCEDURAL POSTURE	Petitioner sought habeas relief challenging the statutory basis for his immigration detention and requested a bond hearing. He also moved for default judgment. The court granted habeas relief on the 8 U.S.C. § 1226(a) claim, denied default judgment, and ordered respondents to provide a bond hearing.
PRECEDENTIAL VALUE	unpublished district court order; nonprecedential
PARTIES	Lennin Sanchez-Jimenez v. Todd Lyons, George Valdez, Markwayne Mullen, U.S. Department of Homeland Security, Todd Blanche, Executive Office for Immigration Review, Juan Baltazar

TOPICS

- immigration detention
- removal proceedings
- default judgment
- default
- statutory interpretation

PRACTICE AREAS

- immigration law
- habeas corpus
- civil procedure

QUESTIONS PRESENTED

1. Whether Sanchez-Jimenez's detention was governed by 8 U.S.C. § 1225 or 8 U.S.C. § 1226(a).
2. Whether detention under § 1226(a) without a bond hearing violated the statute.
3. Whether respondents were subject to default judgment for allegedly failing to respond timely and without a prior clerk's entry of default.
4. Whether the court needed to reach the petitioner's remaining Administrative Procedure Act and Fifth Amendment claims after granting relief under § 1226(a).

HOLDINGS

1. The petitioner's detention was governed by 8 U.S.C. § 1226(a), rather than the mandatory-detention provisions of § 1225(b)(2)(A), because he was detained while already present in the United States and facing removal proceedings, and respondents identified no material facts distinguishing the case from the court's prior decisions.
2. Because there was no evidence that Sanchez-Jimenez had received a bond hearing, his continued detention violated § 1226(a), and respondents were required to provide a bond hearing within seven days.
3. Default judgment was not warranted because respondents timely responded and petitioner had not obtained the clerk's entry of default required by Federal Rule of Civil Procedure 55(a).

KEY QUOTATIONS

“Because there is no evidence that petitioner has been provided a bond hearing, his current detention violates § 1226(a).”

“The burden of proof at the bond hearing will be on the government.”

FACTUAL BACKGROUND

Sanchez-Jimenez, a citizen of Nicaragua, entered the United States on June 6, 2022, was paroled the next day, and remained in the country after his parole expired in August 2022. ICE encountered him during a traffic stop on January 7, 2026, while he had a pending asylum application, and detained him under a custody determination referencing § 236 of the Immigration and Nationality Act. He was later served with a Notice to Appear classifying him as present without admission rather than as an arriving noncitizen. The court found no material distinction between his circumstances and prior cases involving noncitizens detained after entering and remaining in the United States without inspection.

PROCEDURAL HISTORY

Sanchez-Jimenez filed a petition for a writ of habeas corpus on April 8, 2026, asserting claims under the Administrative Procedure Act, 8 U.S.C. § 1226(a), and the Fifth Amendment. Respondents timely responded. The court determined that the detention was governed by § 1226(a), granted the petition in part on that claim, declined to reach the remaining claims, denied the motion for default judgment, and ordered a bond hearing within seven days.

DISPOSITION

other

REMAND INSTRUCTIONS

Respondents must provide petitioner with a bond hearing under 8 U.S.C. § 1226(a) within seven days of the order, with the government bearing the burden of proving that continued detention is justified. Within five days after the hearing, the parties must file a status report stating whether the hearing occurred and whether bond was granted or denied.

CASES CITED

- Moncada-Hernandez v. Trump, No. 26-cv-00436-PAB, 2026 WL 472744, at *2-3 (D. Colo. Feb. 19, 2026)
- De La Cruz v. Baltazar, No. 26-cv-00360-PAB, 2026 WL 439217, at *2 (D. Colo. Feb. 16, 2026)
- Gabriel-Morales v. Bondi, No. 26-cv-00392-PAB, 2026 WL 415597, at *2 (D. Colo. Feb. 13, 2026)
- Alfaro Orellana v. Noem, No. 25-cv-03976-PAB, 2025 WL 3706417 (D. Colo. Dec. 22, 2025)
- Capote Zamora v. Mullin, No. 26-cv-00538-PAB, 2026 WL 1026810, at *2-4 (D. Colo. Apr. 16, 2026)
- Rafibaev v. Noem, No. 26-cv-00461-PAB, 2026 WL 607559, at *2-5 (D. Colo. Mar. 4, 2026)
- Loa Caballero v. Baltazar, No. 25-cv-03120-NYW, 2025 WL 2977650, at *8-9 (D. Colo. Oct. 22, 2025)
- Abanil v. Baltazar, No. 25-cv-4029-WJM-STV, 2026 WL 100587, at *8 (D. Colo. Jan. 14, 2026)
- Arredondo v. Baltazar, No. 25-cv-03040-RBJ, 2025 WL 4083607, at *4 (D. Colo. Oct. 31, 2025)