

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

Ricardo Paumier Sanchez v. Kevin Raycraft et al.

No. 1:25-cv-1908 (W.D. Mich. Jan. 20, 2026) · No. 1:25-cv-1908 · Decided January 20, 2026

SUMMARY

The United States District Court for the Western District of Michigan conditionally granted Ricardo Paumier Sanchez’s petition for a writ of habeas corpus under 28 U.S.C. § 2241. The court held that detention under 8 U.S.C. § 1225(b)(2)(A) violated due process and ordered Respondents to provide a bond hearing under § 1226(a) within five business days or release the Petitioner, while dismissing several named Respondents.

CASE DETAILS

COURT	United States District Court for the Western District of Michigan, Southern Division
WRITING FOR THE COURT	Robert J. Jonker
JURISDICTION	United States District Court for the Western District of Michigan, Southern Division
DECIDED	January 20, 2026
DOCKET	1:25-cv-1908
DISPOSITION	writ_granted
PROCEDURAL POSTURE	Petitioner brought a counseled petition for a writ of habeas corpus under 28 U.S.C. § 2241, challenging his immigration detention and seeking release or a constitutionally adequate bond hearing. The district court conditionally granted the petition and dismissed several named respondents.
STANDARD OF REVIEW	The court reviewed the legality of petitioner's detention under 28 U.S.C. § 2241 and considered whether prudential exhaustion should be required. The opinion does not state a separate formal standard of review.
PRECEDENTIAL VALUE	unpublished district court opinion; persuasive value only
PARTIES	Ricardo Paumier Sanchez v. Kevin Raycraft, et al.

TOPICS

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QUESTIONS PRESENTED

1. Whether prudential exhaustion of administrative remedies should bar or delay petitioner's § 2241 challenge to his immigration detention.
2. Whether petitioner was detained under the mandatory-detention provisions of 8 U.S.C. § 1225(b)(2)(A) or instead under the discretionary-detention provisions of 8 U.S.C. § 1226(a).
3. Whether petitioner's detention under the § 1225(b)(2)(A) mandatory-detention framework violated the Fifth Amendment Due Process Clause.
4. Whether the ICE Detroit Field Office Director was the only proper respondent in the habeas action.

HOLDINGS

1. The court declined to enforce prudential exhaustion and alternatively held that waiver of exhaustion was appropriate.
2. 8 U.S.C. § 1226(a), rather than 8 U.S.C. § 1225(b)(2)(A), governs noncitizens who have resided in the United States and were already within the United States when apprehended and arrested.
3. Petitioner's current detention under the mandatory-detention framework of 8 U.S.C. § 1225(b)(2)(A) violated the Fifth Amendment Due Process Clause.
4. The ICE Detroit Field Office Director was not the only proper respondent. The court retained the Field Office Director and the Secretary of Homeland Security and dismissed the Department of Homeland Security, the Attorney General, and the Executive Office for Immigration Review as respondents.

KEY QUOTATIONS

“The Constitution guarantees that the writ of habeas corpus is “available to every individual detained within the United States.”” (Section III)

“The Court will order Respondents to provide Petitioner with a bond hearing under 8 U.S.C. § 1226(a) within five business days of the date of this Court’s opinion and judgment or, in the alternative, immediately release Petitioner from custody.” (Conclusion)

FACTUAL BACKGROUND

Ricardo Paumier Sanchez is a Cuban citizen who entered the United States at the Brownsville, Texas Port of Entry on or about November 20, 2023. DHS issued him a notice to appear charging inadmissibility under INA § 212(a)(6)(A)(i), and he was subsequently paroled into the United States. ICE arrested him in December 2025, and he had not received a bond hearing by the time he filed his petition.

PROCEDURAL HISTORY

Petitioner filed the § 2241 petition on December 27, 2025. The court ordered respondents to show cause, respondents filed a response, and the court proceeded to the merits after declining to enforce prudential exhaustion and alternatively determining that waiver was appropriate.

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 or immediately release him. Respondents must file a status report within six business days certifying compliance and reporting the outcome and conditions or reasons for the bond decision. The court dismissed the United States Department of Homeland Security, the United States Attorney General, and the Executive Office for Immigration Review as respondents.

CASES CITED

- 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)
- Antelex 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)

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