

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

**Hector Cid-Barrios v. Kevin Raycraft, Director of Enforcement and
Removal Operations, Detroit Field Office, U.S. Immigration and
Customs Enforcement, Kristi Noem, Secretary, U.S. Department of
Homeland Security, Pamela Bondi, U.S. Attorney General, and
Executive Office for Immigration Review**

Cid-Barrios v. Raycraft, No. 25-13630 (E.D. Mich. Dec. 24, 2025) · No. 2:25-cv-13630 · Decided December 24,
2025

SUMMARY

The court holds that the ICE Detroit Field Office director is the proper immediate custodian and respondent for a detained noncitizen’s 28 U.S.C. § 2241 habeas petition under binding Sixth Circuit precedent. Applying *Rumsfeld v. Padilla*, the court concludes that the petition must be filed in the district of confinement, which is the Western District of Michigan because the petitioner is detained in Baldwin, Michigan. The court orders the case transferred from the Eastern District of Michigan to the Western District of Michigan.

CASE DETAILS

COURT	United States District Court for the Eastern District of Michigan, Southern Division
WRITING FOR THE COURT	David M. Lawson
JURISDICTION	United States District Court for the Eastern District of Michigan, Southern Division
DECIDED	December 24, 2025
DOCKET	2:25-cv-13630
DISPOSITION	transferred
PROCEDURAL POSTURE	Petition for a writ of habeas corpus under 28 U.S.C. § 2241 challenging immigration detention and seeking release or a prompt bond hearing; the court transferred the case to the Western District of Michigan because the petitioner was confined there.
STANDARD OF REVIEW	The court applied the governing habeas jurisdiction and venue principles under 28 U.S.C. § 2241 and <i>Rumsfeld v. Padilla</i> , along with

	the mandatory transfer standard under 28 U.S.C. § 1631.
PRECEDENTIAL VALUE	unpublished district court opinion
PARTIES	Hector Cid-Barrios v. Kevin Raycraft, Kristi Noem, Pamela Bondi, Executive Office for Immigration Review

TOPICS

immigration detention federal habeas corpus removal proceedings venue subject matter jurisdiction

PRACTICE AREAS

immigration law federal habeas corpus civil procedure

QUESTIONS PRESENTED

1. Whether the proper respondent in a § 2241 habeas petition by an immigration detainee is the ICE regional or district director rather than the warden or administrator of the detention facility.
2. Whether a core habeas petition challenging present physical confinement must be filed in the federal district containing the place of confinement.
3. Whether transfer under 28 U.S.C. § 1631, rather than dismissal, was the appropriate remedy for filing the petition in the wrong district.

HOLDINGS

1. Under binding Sixth Circuit precedent, the ICE official responsible for the district in which the noncitizen is detained is the immediate custodian and proper respondent to a § 2241 petition challenging immigration detention; the administrator of the contract detention facility is not the required respondent.
2. A core § 2241 habeas petition challenging present physical confinement must be filed in the single federal district that includes the place of confinement and has territorial jurisdiction over the proper respondent.
3. When a § 2241 petition is filed in a district lacking the proper territorial jurisdiction, the court should transfer the action under 28 U.S.C. § 1631 when another federal court could exercise jurisdiction and transfer is in the interest of justice.

KEY QUOTATIONS

“that a detained alien generally must designate his immediate custodian — the INS District Director for the district where he is being detained — as the respondent to his habeas corpus petition” (at 5)

“for core habeas petitions challenging present physical confinement, jurisdiction lies in only one district: the district of confinement.” (at 9)

“Although the petitioner properly named the ICE Acting District Director as a respondent to his habeas corpus petition, because he is confined within the territory of Michigan’s Western District, he should have

filed the petition in that court.” (at 11)

FACTUAL BACKGROUND

Hector Cid-Barrios, a Mexican citizen who had lived in the United States for more than twenty-five years, was detained by ICE beginning approximately October 7, 2025, at the North Lake Processing Center in Baldwin, Michigan. He had no criminal history, had a domestic partner and four United States-born children, and had submitted a Form I-601A provisional waiver application. After requesting a bond hearing and receiving no scheduled hearing, he filed a § 2241 petition seeking a bond hearing or release.

PROCEDURAL HISTORY

Cid-Barrios filed a § 2241 habeas petition in the Eastern District of Michigan while detained at the North Lake Processing Center in Baldwin, Michigan. The court ordered the parties to show cause why the case should not be transferred because Baldwin is in the Western District of Michigan. After receiving the parties' responses and an amicus brief, the court held that Raycraft was the proper respondent under binding Sixth Circuit precedent but that the petition had to be filed in the district of confinement, and transferred the case under 28 U.S.C. § 1631.

DISPOSITION

transferred

REMAND INSTRUCTIONS

The Clerk was ordered to transfer the case to the United States District Court for the Western District of Michigan.

CASES CITED

- In re Gregory, 181 F.3d 713, 714 (6th Cir. 1999)
- Roman v. Ashcroft, 340 F.3d 314, 319-22, 328 (6th Cir. 2003)
- Rumsfeld v. Padilla, 542 U.S. 426, 434-44, 451 (2004)
- Hamdi v. Rumsfeld, 542 U.S. 507, 525 (2004)
- Zadvydas v. Davis, 533 U.S. 678, 687 (2001)
- A.A.R.P. v. Trump, 605 U.S. 91, 94-95 (2025)
- Nat'l Republican Senatorial Comm. v. Fed. Election Comm'n, 117 F.4th 389, 395 (6th Cir. 2024), cert. granted, 145 S. Ct. 2843 (2025)
- Ramos v. Louisiana, 590 U.S. 83, 124 n.5 (2020) (Kavanaugh, J., concurring in part)
- Smith v. Michigan Dep't of Corr., 159 F.4th 1067, 1076 (6th Cir. 2025)
- Wright v. Spaulding, 939 F.3d 695, 700 (6th Cir. 2019)
- Aguilar v. Dunbar, No. 25-12831 (E.D. Mich. Nov. 13, 2025)
- Hurtado-Medina v. Raycraft, No. 25-13248, 2025 WL 3268896, at *5 (E.D. Mich. Nov. 24, 2025)
- Kholyavskiy v. Achim, 443 F.3d 946, 953 (7th Cir. 2006)

- al-Marri v. Rumsfeld, 360 F.3d 707, 711 (7th Cir. 2004)
- Henderson v. I.N.S., 157 F.3d 106, 122 (2d Cir. 1998)
- Multani v. Noem, No. 25-1513, 2025 WL 3550608, at *4-8 (W.D. Mich. Dec. 11, 2025)
- Kontrick v. Ryan, 540 U.S. 443, 454 (2004)
- Steel Co. v. Citizens for Better Env't, 523 U.S. 83, 90 (1998)
- United States v. Alam, 960 F.3d 831, 834 (6th Cir. 2020)
- Hamer v. Neighborhood Hous. Serv. of Chi., 583 U.S. 17, 20 (2017)
- Ahrens v. Clark, 335 U.S. 188 (1948)
- Carbo v. United States, 364 U.S. 611, 618 (1961)

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