

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF  
INDIANA, SOUTH BEND DIVISION

Chambers v. English

Chambers · No. 3:26-CV-281-CCB-SJF · Decided March 26, 2026

SUMMARY

The United States District Court for the Northern District of Indiana denies Ernel Chambers’s 28 U.S.C. § 2241 habeas petition challenging his continued immigration detention. The court concludes that removal to Dominica remains reasonably foreseeable, that Chambers received adequate notice and an informal interview concerning revocation of supervised release, and that the government had not yet violated applicable custody-review regulations. The court notes that Chambers may seek habeas relief later if continued detention becomes unreasonable.

CASE DETAILS

|                       |                                                                                                                                                                                                                                                                                                                                            |
|-----------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| COURT                 | United States District Court for the Northern District of Indiana, South Bend Division                                                                                                                                                                                                                                                     |
| WRITING FOR THE COURT | Cristal C. Brisco                                                                                                                                                                                                                                                                                                                          |
| JURISDICTION          | United States District Court for the Northern District of Indiana, South Bend Division                                                                                                                                                                                                                                                     |
| DECIDED               | March 26, 2026                                                                                                                                                                                                                                                                                                                             |
| DOCKET                | 3:26-CV-281-CCB-SJF                                                                                                                                                                                                                                                                                                                        |
| DISPOSITION           | dismissed                                                                                                                                                                                                                                                                                                                                  |
| PROCEDURAL POSTURE    | Petition for a writ of habeas corpus under 28 U.S.C. § 2241 challenging post-removal-order immigration detention.                                                                                                                                                                                                                          |
| STANDARD OF REVIEW    | The court reviewed the § 2241 petition to determine whether Chambers was entitled to habeas relief from allegedly unlawful post-removal-order detention. The court assessed statutory authorization for detention, the likelihood of removal in the reasonably foreseeable future, and compliance with applicable immigration regulations. |
| PRECEDENTIAL VALUE    | unpublished and nonprecedential district-court opinion                                                                                                                                                                                                                                                                                     |
| PARTIES               | Ernel Chambers v. Brian English                                                                                                                                                                                                                                                                                                            |

TOPICS

immigration detention

federal habeas corpus

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administrative law

## PRACTICE AREAS

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## QUESTIONS PRESENTED

1. Whether the court had subject-matter jurisdiction over a § 2241 challenge to post-removal-order immigration detention notwithstanding 8 U.S.C. §§ 1252(g) and 1252(b)(9).
2. Whether Chambers's continued detention was authorized under 8 U.S.C. § 1231 because his removal was reasonably foreseeable.
3. Whether Chambers was entitled to habeas relief because he allegedly did not receive notice of the revocation of supervised release or an opportunity to contest it.
4. Whether the government violated 8 C.F.R. §§ 241.13(i)(2) and 241.4(l)(3) by failing to initiate a normal custody-review process after revocation of release.

## HOLDINGS

1. The court had jurisdiction to review Chambers's post-removal-order immigration-detention claims under § 2241; 8 U.S.C. §§ 1252(g) and 1252(b)(9) did not deprive the court of jurisdiction.
2. Continued detention beyond the removal period is authorized only for persons covered by 8 U.S.C. § 1231(a)(6) and only while removal is reasonably foreseeable. Because the government showed that Dominica was likely to issue travel documents and that removal remained reasonably foreseeable, Chambers was not entitled to habeas relief on this ground.
3. Chambers was not entitled to habeas relief based on his claim that he lacked notice of the revocation of supervision or an opportunity to contest it because the respondent submitted contrary documentation and Chambers offered no rebuttal.
4. The government had not shown that it initiated the normal review process contemplated by 8 C.F.R. § 241.4(l)(3), but the regulation's statement that review should ordinarily occur within approximately three months was uncertain and aspirational rather than a firm deadline. The court therefore found no regulatory violation after approximately five months of re-detention; alternatively, any failure was harmless because removal remained reasonably foreseeable.

## KEY QUOTATIONS

*“[O]nce removal is no longer reasonably foreseeable, continued detention is no longer authorized by statute.”* (533 U.S. at 699)

*“the court should hold continued detention unreasonable and no longer authorized by statute”* (533 U.S. at 699-700)

*“This language is both uncertain and aspirational, so the court cannot reasonably characterize it as setting a firm deadline for the initiation of the normal review process.”*

## FACTUAL BACKGROUND

Chambers was ordered removed to Dominica in 2014 following a criminal conviction. ICE released him on supervision in 2014, briefly detained and released him in 2017, and detained him again on October 22, 2025, after revoking his supervised release. Although ICE had not yet removed him, it submitted a travel-document request to the Dominica consulate on February 20, 2026, and represented that removal was expected within thirty days. Chambers also alleged that he had not received adequate notice or review following revocation of supervision.

## PROCEDURAL HISTORY

Chambers filed a § 2241 habeas petition alleging that his immigration detention violated federal law and the Constitution. The respondent answered, Chambers replied, and the court denied the petition, directing the clerk to close the case.

## DISPOSITION

dismissed

## CASES CITED

- Vu v. English, No. 3:25CV999 DRL-SJF, 2026 WL 194171, at \*2-\*3 (N.D. Ind. Jan. 26, 2026)
- Kem v. Noem, No. 3:25-CV-997-DRL-SJF, 2026 WL 100566, at \*1 (N.D. Ind. Jan. 14, 2026)
- Pho v. Noem, No. 3:25-CV-977-CCB-SJF, 2025 WL 3750684, at \*1-\*4 (N.D. Ind. Dec. 29, 2025)
- Zadvydas v. Davis, 533 U.S. 678, 689, 699-701 (2001)
- Guan v. Bondi, No. 3:26-CV-192-CCB-SJF, 2026 WL 772417, at \*2 (N.D. Ind. Mar. 19, 2026)
- Zelaya Diaz v. Rosen, 986 F.3d 687, 690 (7th Cir. 2021)
- Accardi v. Shaughnessy, 347 U.S. 260, 268 (1954)
- Samirah v. Holder, 627 F.3d 652, 664 (7th Cir. 2010)

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