

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
FLORIDA, FORT MYERS DIVISION

Yainerys Sanchez on behalf of Julio Cesar Machado Mesa v. Warden,
Glades County Detention Center et al.

Sanchez v. Warden · No. 2:26-cv-00318-SPC-DNF · Decided February 17, 2026

SUMMARY

The court addresses a habeas corpus petition filed by Yainerys Sanchez on behalf of immigration detainee Julio Cesar Machado Mesa, alleging unconstitutional detention under the Fifth Amendment. The court finds that Sanchez has not established why Machado Mesa cannot appear on his own behalf, as required for next-friend standing under 28 U.S.C. § 2242 and *Whitmore v. Arkansas*. Sanchez is directed to submit supplemental evidence within 21 days, or Machado Mesa may file an amended petition; otherwise, the action will be dismissed for lack of standing.

CASE DETAILS

COURT	United States District Court for the Middle District of Florida, Fort Myers Division
JURISDICTION	United States District Court, Middle District of Florida, Fort Myers Division
DECIDED	February 17, 2026
DOCKET	2:26-cv-00318-SPC-DNF
DISPOSITION	other
PROCEDURAL POSTURE	The court considered a petition for a writ of habeas corpus filed by Sanchez on behalf of an immigration detainee.
PRECEDENTIAL VALUE	Unknown; district court opinion and procedural order
PARTIES	Yainerys Sanchez on behalf of Julio Cesar Machado Mesa v. Warden, Glades County Detention Center et al.

TOPICS

- federal habeas corpus
- standing
- immigration detention
- immigration
- civil procedure

PRACTICE AREAS

- immigration
- federal habeas corpus
- civil procedure
- constitutional law

QUESTIONS PRESENTED

1. Whether Sanchez established next-friend standing to file and verify a habeas petition on behalf of Machado Mesa.
2. What procedural remedy was appropriate when the proposed next friend failed to show why the detainee could not appear on his own behalf.

HOLDINGS

1. A person seeking to litigate a habeas action as a next friend must clearly establish why the detainee cannot appear on his own behalf and must be genuinely dedicated to the detainee's best interests. Sanchez established dedication to Machado Mesa's best interests but failed to establish why he could not personally sign and verify the petition.

KEY QUOTATIONS

“But “‘next friend’ standing is by no means granted automatically to whomever seeks to pursue an action on behalf of another.” (495 U.S. at 163)

“The burden is on the ‘next friend’ clearly to establish the propriety of h[er] status and thereby justify the jurisdiction of the court.” (495 U.S. at 164)

FACTUAL BACKGROUND

Machado Mesa was detained by immigration officials at Glades County Detention Center. Sanchez, his long-term partner of ten years and the mother of their U.S. citizen children, filed and verified the habeas petition on his behalf. She demonstrated a relationship with him and her dedication to his best interests, but did not explain why Machado Mesa could not personally sign and verify the petition.

PROCEDURAL HISTORY

Sanchez filed a habeas petition alleging that Machado Mesa's immigration detention violated the Fifth Amendment because there was no significant likelihood of removal in the reasonably foreseeable future. The court found that Sanchez had not established all requirements for next-friend standing and ordered her to provide supplemental evidence or directed Machado Mesa to file an amended petition within 21 days, warning that the action would otherwise be dismissed for lack of standing.

DISPOSITION

other

REMAND INSTRUCTIONS

Within 21 days of the order, Sanchez must submit a supplemental declaration or other evidence demonstrating that Machado Mesa cannot appear on his own behalf, or Machado Mesa must sign, verify, and file an amended habeas petition. If neither occurs, the court will dismiss the action for lack of standing, enter judgment, and close the case without further notice.

CASES CITED

- Whitmore v. Arkansas, 495 U.S. 149, 162-164 (1990)

OPINION

UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF FLORIDA FORT MYERS DIVISION YAINERYS SANCHEZ on behalf of JULIO CESAR MACHADO MESA, Petitioner, v. Case No.: 2:26-cv-00318-SPC-DNF WARDEN, GLADES COUNTY DETENTION CENTER et al., Respondent, / OPINION AND ORDER Before the Court is a Petition for Writ of Habeas Corpus filed by Yainerys Sanchez on behalf of Julio Cesar Machado Mesa, who is detained by immigration officials at Glades County Detention Center.

(Doc. 1). Sanchez claims the detention violates the Fifth Amendment because there is no significant likelihood of removal in the reasonably foreseeable future. “Application for a writ of habeas corpus shall be in writing and verified by the person for whose relief it is intended or someone acting in his behalf.” 28 U.S.C. § 2242.

The latter part of that statutory provision codifies the common law tradition of permitting a “next friend” to litigate on behalf of a detained person who is unable to seek relief himself, “usually because of mental incompetence or inaccessibility.” Whitmore v. Arkansas, 495 U.S. 149, 162 (1990). But “‘next friend’ standing is by no means granted automatically to whomever seeks to pursue an action on behalf of another.” Id. 1t 163.

The “next friend” must adequately explain why the detainee cannot appear on his own behalf to prosecute the action, and she must be truly dedicated to the best interests of the detainee. Id. “The burden is on the ‘next friend’ clearly to establish the propriety of h[er] status and thereby justify the jurisdiction of the court.” Id. at 164. Sanchez describes her relationship with Machado Mesa in a declaration that accompanies the petition.

She is Machado Mesa’s long-term partner of ten years and the mother of their U.S. citizen children. The Court is satisfied that Sanchez is truly dedicated to Machado Mesa’s best interests and is capable of signing and verifying the petition on his behalf. But Sanchez does not address the other requirement. She does not demonstrate why Machado Mesa cannot sign and verify the petition himself.

To proceed with this action, Sanchez must demonstrate—with a supplemental declaration or other evidence—that Machado Mesa cannot appear on his own behalf. Alternatively, Machado Mesa may sign, verify, and file an amended habeas petition. If neither step is taken within 21 days of this Order, the Court will dismiss this action for lack of standing, enter judgment, and close this case without further notice.

DONE AND ORDERED in Fort Myers, Florida on February 17, 2026. tt WOhLataat he UNITED STATES DISTRICT JUDGE SA: FTMP-1

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