

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)

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