

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
MICHIGAN

Gurjinder Singh v. Kevin Raycraft et al.

Singh · No. 25-13673 · Decided December 9, 2025

SUMMARY

The United States District Court for the Eastern District of Michigan ordered the transfer of Gurjinder Singh’s 28 U.S.C. § 2241 habeas petition to the Western District of Michigan. The court held that venue lies in the district of confinement and that transfer under 28 U.S.C. § 1406(a), rather than dismissal, was in the interest of justice because Singh was confined in Lake County, Michigan.

CASE DETAILS

COURT	United States District Court for the Eastern District of Michigan
WRITING FOR THE COURT	Shalina D. Kumar
JURISDICTION	United States District Court for the Eastern District of Michigan
DECIDED	December 9, 2025
DOCKET	25-13673
DISPOSITION	other
PROCEDURAL POSTURE	Petition for a writ of habeas corpus under 28 U.S.C. § 2241 was filed in the Eastern District of Michigan and transferred to the Western District of Michigan because venue was proper in the district of confinement.
PRECEDENTIAL VALUE	nonprecedential
PARTIES	Gurjinder Singh v. Kevin Raycraft et al.

TOPICS

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

PRACTICE AREAS

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

QUESTIONS PRESENTED

1. Whether a § 2241 habeas petition seeking immediate release from physical confinement must be brought in the federal district where the petitioner is confined.
2. Whether the court should transfer the petition under 28 U.S.C. § 1406(a) rather than dismiss it when venue is improper and the proper district is identifiable.

HOLDINGS

1. For a habeas action seeking, at least in part, immediate release from physical confinement, jurisdiction and venue lie only in the federal district of confinement.
2. When venue is improper, 28 U.S.C. § 1406(a) permits transfer to the proper district when transfer is in the interest of justice, and transfer was appropriate here.

KEY QUOTATIONS

“For habeas actions seeking, at least in part, immediate release from physical confinement, “jurisdiction lies only in one district: the district of confinement.”” (at 1)

“Here, the interest of justice requires transfer rather than dismissal.” (at 2)

FACTUAL BACKGROUND

Singh filed a habeas petition challenging his detention under the Immigration and Nationality Act and the Due Process Clause of the Fifth Amendment. He was confined at North Lake Correctional Facility in Lake County, Michigan, which is within the Western District of Michigan. Because the petition sought immediate release from physical confinement, the court treated the district of confinement as the proper venue.

PROCEDURAL HISTORY

Gurjinder Singh filed a § 2241 habeas petition alleging unlawful immigration detention at North Lake Processing Center in Baldwin, Michigan. The Eastern District of Michigan determined that Lake County lies within the Western District of Michigan and transferred the petition rather than dismissing it under 28 U.S.C. § 1406(a).

DISPOSITION

other

REMAND INSTRUCTIONS

The Clerk was directed to transfer Singh's § 2241 petition, ECF No. 1, to the Western District of Michigan.

CASES CITED

- Trump v. J.G.G., 604 U.S. 670, 672 (2025)
- Rumsfeld v. Padilla, 542 U.S. 426, 443 (2004)
- Rumsfeld v. Padilla, 542 U.S. 426, 451 (2004) (Kennedy, J., concurring)

- Aguilar v. Dunbar, 2025 WL 3281540, at *8-*9, ____ F. Supp. 3d ____ (E.D. Mich. Nov. 13, 2025)

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