

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MINNESOTA

Maria D. v. David Easterwood, et al.

Maria D. · No. 0:26-cv-01269 (ECT/SGE) · Decided February 12, 2026

SUMMARY

The United States District Court for the District of Minnesota grants Maria D.’s petition for a writ of habeas corpus challenging her immigration detention. The court holds that she was improperly classified as subject to mandatory detention under 8 U.S.C. § 1225(b)(2), rather than discretionary detention under § 1226(a), and concludes that the government failed to establish a warrant-based statutory predicate for her detention. The court orders her release, with specified procedures if she has been moved outside Minnesota.

CASE DETAILS

COURT	United States District Court for the District of Minnesota
WRITING FOR THE COURT	Eric C. Tostrud
JURISDICTION	United States District Court for the District of Minnesota
DECIDED	February 12, 2026
DOCKET	0:26-cv-01269 (ECT/SGE)
DISPOSITION	writ_granted
PROCEDURAL POSTURE	Petition for a writ of habeas corpus under 28 U.S.C. § 2241 challenging immigration detention and the denial of a bond hearing.
PRECEDENTIAL VALUE	unpublished district court opinion
PARTIES	Maria D. v. David Easterwood, in his official capacity as Field Office Director, St. Paul Field Office, U.S. Immigration and Customs Enforcement, U.S. Immigration and Customs Enforcement, Todd Lyons, in his official capacity as Director of U.S. Immigration and Customs Enforcement, Kristi Noem, in her official capacity as Secretary of Homeland Security, U.S. Department of Homeland Security, Pamela Bondi, in her official capacity as Attorney General of the United States

TOPICS

- immigration detention
- statutory interpretation
- removal proceedings
- due process
- civil procedure

PRACTICE AREAS

immigration detention

habeas corpus

statutory interpretation

constitutional law

civil procedure

QUESTIONS PRESENTED

1. Whether the court had subject-matter jurisdiction to determine whether Maria was subject to discretionary detention under 8 U.S.C. § 1226(a) or mandatory detention under 8 U.S.C. § 1225(b)(2).
2. Whether Maria was properly classified as subject to mandatory detention under 8 U.S.C. § 1225(b)(2), or instead was subject to discretionary detention under 8 U.S.C. § 1226(a).
3. Whether detention under § 1226(a) was lawful absent an arrest warrant and, if not, whether immediate release was an appropriate habeas remedy.

HOLDINGS

1. The jurisdiction-stripping provisions of 8 U.S.C. § 1252(a)(5), (b)(9), and (g) do not bar review of the narrow question whether a noncitizen is subject to discretionary detention under § 1226 or mandatory detention under § 1225(b)(2).
2. Maria was misclassified under 8 U.S.C. § 1225(b)(2); because she was already in the United States, her detention, if authorized, falls under the discretionary detention provisions of 8 U.S.C. § 1226(a), not mandatory detention under § 1225(b)(2).
3. A warrant is a necessary condition for discretionary detention under § 1226(a); absent a warrant, the government may not arrest and detain a noncitizen under that provision, and immediate release is an appropriate habeas remedy where no lawful statutory predicate for detention has been established.

KEY QUOTATIONS

“Issuance of a warrant is a necessary condition to discretionary detention under section 1226(a).”

“[R]elease is an available and appropriate remedy for detention that lacks a lawful predicate.”

“Habeas is at its core a remedy for unlawful executive detention. The typical remedy for such detention is, of course, release.”

FACTUAL BACKGROUND

Maria D., an Ecuadorian citizen, entered the United States on or about May 19, 2024, presented herself to an immigration official, and was released on her own recognizance into ordinary removal proceedings under 8 U.S.C. § 1229. She promptly applied for asylum and had no final order of removal. She was later arrested in St. Paul, Minnesota, allegedly without any judicial or administrative warrant, and detained while the government had not established her exact location. The government did not dispute the petition's factual allegations or produce a warrant.

PROCEDURAL HISTORY

Maria D. filed a verified § 2241 habeas petition in the District of Minnesota, alleging that the government had misclassified her as subject to mandatory detention under 8 U.S.C. § 1225(b)(2), denied her a bond hearing, and

arrested and detained her without a warrant. Respondents did not dispute the petition's factual allegations and did not produce a warrant. The court granted the petition, held that Maria was subject to § 1226(a), and ordered her release, with a requirement that she be returned to Minnesota before release if she had been transferred elsewhere.

DISPOSITION

writ_granted

REMAND INSTRUCTIONS

Respondents must release Maria as soon as practicable. If she remains detained in Minnesota, release must occur no later than 48 hours after entry of the order. If she has been moved outside Minnesota, Respondents must return her to Minnesota and release her no later than 72 hours after entry of the order.

CASES CITED

- Jose J.O.E. v. Bondi, 797 F. Supp. 3d 957, 961–62 (D. Minn. 2025)
- Avila v. Bondi, No. 25-cv-3741 (JRT/SGE), 2025 WL 2976539 (D. Minn. Oct. 21, 2025)
- Jennings v. Rodriguez, 583 U.S. 281, 289 (2018)
- Francisco T. v. Bondi, 797 F. Supp. 3d 970, 974–76 (D. Minn. 2025)
- Belsai D.S. v. Bondi, No. 25-cv-3682 (KMM/EMB), 2025 WL 2802947, at *6–7 (D. Minn. Oct. 1, 2025)
- Fernando F.P.D. v. Brott, No. 25-cv-4455 (ECT/ECW), 2025 WL 3675151, at *2 (D. Minn. Dec. 17, 2025)
- Eliseo A.A. v. Olson, No. 25-cv-3381 (JWB/DJF), 2025 WL 2886729, at *2–4 (D. Minn. Oct. 8, 2025)
- Andres R.E. v. Bondi, No. 25-cv-3946 (NEB/DLM), 2025 WL 3146312, at *2–3 (D. Minn. Nov. 4, 2025)
- E.M. v. Noem, No. 25-cv-3975 (SRN/DTS), 2025 WL 3157839, at *4–8 (D. Minn. Nov. 12, 2025)
- Santos M.C. v. Olson, No. 25-cv-4264 (PJS/DJF), 2025 WL 3281787, at *2–3 (D. Minn. Nov. 25, 2025)
- Castañon-Nava v. U.S. Dep’t of Homeland Sec., 161 F.4th 1048, 1062 (7th Cir. 2025)
- Buenrostro-Mendez v. Bondi, Nos. 25-20496, 25-40701, 2026 WL 323330, at *1 (5th Cir. Feb. 6, 2026)
- Choglllo Chafila v. Scott, No. 2:25-cv-00437, 2025 WL 2688541, at *11 (D. Me. Sept. 21, 2025)
- Chiliquinga Yumbillo v. Stamper, No. 2:25-cv-00479, 2025 WL 2783642, at *5 (D. Me. Sept. 30, 2025)
- J.A.C.P. v. Wofford, No. 1:25-cv-01354, 2025 WL 3013328, at *8 (E.D. Cal. Oct. 27, 2025)
- Florida v. United States, 660 F. Supp. 3d 1239, 1276 (N.D. Fla. 2023)
- Vedat C. v. Bondi, No. 25-cv-4642 (JWB/DTS), Order on Petition for Writ of Habeas Corpus at 6 (D. Minn. Dec. 19, 2025)
- Munaf v. Geren, 553 U.S. 674, 693 (2008)