

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF
CALIFORNIA

Michael Zimran v. Kristi Noem

Zimran · No. 5:25-cv-03143-JFW-KES · Decided January 21, 2026

SUMMARY

The United States District Court for the Central District of California accepted the magistrate judge’s final report and recommendation in Michael Zimran’s 28 U.S.C. § 2241 petition. The court granted relief on Grounds One and Two, dismissed Grounds Three and Four as unripe, ordered Zimran’s immediate release subject to supervision, and barred re-detention absent specified regulatory procedures.

CASE DETAILS

COURT	United States District Court for the Central District of California
WRITING FOR THE COURT	John F. Walter
JURISDICTION	United States District Court for the Central District of California
DECIDED	January 21, 2026
DOCKET	5:25-cv-03143-JFW-KES
DISPOSITION	other
PROCEDURAL POSTURE	Petitioner's habeas petition under 28 U.S.C. § 2241 was considered after objections to an initial Report and Recommendation. The district court conducted de novo review of the objections and accepted the magistrate judge's Final Report and Recommendation.
STANDARD OF REVIEW	De novo review of the issues raised in the objections to the magistrate judge's Final Report and Recommendation under 28 U.S.C. § 636.
PRECEDENTIAL VALUE	unknown

TOPICS

- immigration detention
- federal habeas corpus
- injunctions
- removal proceedings
- immigration

PRACTICE AREAS

- immigration detention
- federal habeas corpus
- remedies
- removal proceedings

QUESTIONS PRESENTED

1. Whether the district court should accept the magistrate judge's Final Report and Recommendation after conducting de novo review of the objections.
2. Whether Grounds One and Two of the § 2241 petition should be granted.
3. Whether Grounds Three and Four concerning possible removal to a third country were ripe for adjudication.
4. Whether respondents could continue to detain or re-detain petitioner without following the procedures specified in 8 C.F.R. §§ 241.4 and 241.13.

HOLDINGS

1. The district court accepted the magistrate judge's Final Report and Recommendation, findings, and recommendations after conducting de novo review of the issues raised in the objections.
2. The petition was granted as to Grounds One and Two.
3. Grounds Three and Four, concerning possible removal to a third country, were dismissed as unripe.
4. Respondents were required to immediately release petitioner subject to the order of supervision governing his release before June 2, 2025, and were enjoined from re-detaining him unless and until they followed the procedures set forth in 8 C.F.R. §§ 241.4 and 241.13.

KEY QUOTATIONS

“The Court has engaged in a de novo review of the issues raised in the objections. The Court accepts the final report, findings, and recommendations of the Magistrate Judge.” (at 1)

“Respondents are enjoined and restrained from re-detaining Petitioner unless and until they follow the procedures set forth in 8 C.F.R. §§ 241.4(/) and 241.13q).” (at 1)

FACTUAL BACKGROUND

Petitioner Michael Zimran was detained on June 2, 2025 after previously being released subject to an order of supervision. The petition challenged his custody and also raised claims concerning possible removal to a third country. The district court ordered his immediate release subject to the prior supervision order and prohibited re-detention unless the respondents followed specified regulatory procedures.

PROCEDURAL HISTORY

Michael Zimran filed a petition challenging his federal custody. After the magistrate judge issued an initial Report and Recommendation, Zimran filed objections, and the magistrate judge issued a Final Report and Recommendation. The district court reviewed the petition, objections, and Final Report and Recommendation de novo, accepted the magistrate judge's findings and recommendations, granted Grounds One and Two, dismissed Grounds Three and Four as unripe, ordered immediate release subject to prior supervision conditions, and enjoined re-detention absent specified regulatory procedures.

DISPOSITION

other

REMAND INSTRUCTIONS

No remand was ordered. Respondents were ordered to immediately release petitioner subject to the prior order of supervision, refrain from re-detaining him unless they complied with the procedures in 8 C.F.R. §§ 241.4 and 241.13, and file a custody-status report within seven days.

CASES CITED

- Harrison v. Ollison, 519 F.3d 952, 958 (9th Cir. 2008)

OPINION

Michael Zimran v. Kristi Noem, et al.

PER CURIAM.

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8 UNITED STATES DISTRICT COURT

9 CENTRAL DISTRICT OF CALIFORNIA

10 11 MICHAEL ZIMRAN, Case No. 5:25-cv-03143-JFW-KES 12 Petitioner,

ORDER ACCEPTING FINAL REPORT

13 v. AND RECOMMENDATION OF U.S.

14 KRISTI NOEM, et al., MAGISTRATE JUDGE

15 Respondents. 16

17 18 Pursuant to 28 U.S.C. § 636, the Court has reviewed the Petition (Dkt. 1), the 19 objections
to the initial Report and Recommendation of the United States 20 Magistrate Judge (Dkt. 25), and
the Final Report and Recommendation of the 21 United States Magistrate Judge (Dkt. 26). The
Court has engaged in a de novo 22 review of the issues raised in the objections. The Court accepts
the final report, 23 findings, and recommendations of the Magistrate Judge.1 24 IT IS
THEREFORE ORDERED that: 25 1 As a federal prisoner proceeding under 28 U.S.C. § 2241,
Petitioner is not 26 required to obtain a certificate of appealability in order to appeal to the United
States 27 Court of Appeals in this case. See Harrison v. Ollison, 519 F.3d 952, 958 (9th Cir. 2008).
28 1 1. The Petition is granted as to Grounds One and Two. 2 2. Grounds Three and Four of the
Petition, regarding possible removal to 3 | third country, are dismissed as unripe. 4 3. Respondents
shall immediately release Petitioner Michael Zimran 5 | from custody subject to the order of
supervision that governed his release prior to 6 | his June 2, 2025 detention. 7 4. Respondents are
enjoined and restrained from re-detaining Petitioner 8 || unless and until they follow the procedures
set forth in 8 C.F.R. §§ 241.4(/) and 9 | 241.13q). 10 5. Within seven (7) days of the date of this
order, Respondents shall file 11 | astatus report regarding Petitioner's custody status. 12 13 |
DATED: January 21, 2026

14 = "oN JOHN F. WALTER

ITED STATES DISTRICT JUDGE

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