

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MINNESOTA

Rodrigo M. v. Pamela Bondi, et al.

Rodrigo M. · No. No. 26-cv-1069 (KMM/LIB) · Decided February 8, 2026

SUMMARY

The United States District Court for the District of Minnesota granted in part and denied in part a habeas petition challenging the detention of an individual arrested by federal immigration authorities. The court held that mandatory detention under 8 U.S.C. § 1225(b)(2) did not apply, but that detention under 8 U.S.C. § 1226(a) was authorized because the petitioner was arrested pursuant to a warrant. The court ordered respondents to provide a bond hearing by February 13, 2026.

CASE DETAILS

COURT	United States District Court for the District of Minnesota
WRITING FOR THE COURT	Katherine Menendez
JURISDICTION	United States District Court for the District of Minnesota
DECIDED	February 8, 2026
DOCKET	No. 26-cv-1069 (KMM/LIB)
DISPOSITION	other
PROCEDURAL POSTURE	Petitioner sought habeas relief challenging his immigration detention and requested either a bond hearing or immediate release. The court granted the petition in part, denied it in part, declared that mandatory detention under 8 U.S.C. § 1225(b)(2) did not apply, and ordered a bond hearing under 8 U.S.C. § 1226(a).
PRECEDENTIAL VALUE	unknown
PARTIES	Rodrigo M. v. Pamela Bondi, et al.

TOPICS

immigration detention

immigration

statutory interpretation

injunctions

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QUESTIONS PRESENTED

1. Whether 8 U.S.C. § 1225(b)(2)'s mandatory-detention provision applies to an alien already present in the United States who is not seeking admission.
2. Whether an arrest pursuant to a warrant under 8 U.S.C. § 1226(a) authorizes detention without immediate release.
3. Whether an alien detained under § 1226(a) is entitled to a bond hearing at the outset of detention.

HOLDINGS

1. Section 1225(b)(2) does not apply to aliens already in the United States who are not seeking admission; therefore, Rodrigo M. was not subject to mandatory detention under that provision.
2. An arrest pursuant to an Attorney General's warrant gives the government authority to detain Rodrigo M. under § 1226(a), but a person detained under that provision is entitled to a bond hearing at the outset of detention.

KEY QUOTATIONS

“the better reading of the relevant statutory scheme is that § 1225(b)(2) does not apply to Rodrigo M. or others who are similarly situated, and his mandatory detention under that provision is not supported by the law.” (Discussion I)

“Because Rodrigo M.’s arrest was pursuant to a warrant, Respondents are correct that § 1226(a) provides them the authority to detain him.” (Discussion II)

“Accordingly, while Rodrigo M. is not entitled to immediate release, he is entitled to a bond hearing.” (Discussion II)

FACTUAL BACKGROUND

Rodrigo M., a citizen of El Salvador who had lived in the United States since October 2022, was arrested by federal immigration authorities on February 4, 2026. He did not have a final order of removal, and the circumstances of his arrest involved immigration officers entering a restaurant after two officers in plain clothes had locked the doors and identified themselves as immigration officers. He sought immediate release or a bond hearing, while the government relied on mandatory detention under 8 U.S.C. § 1225(b)(2) and detention authority under § 1226(a).

PROCEDURAL HISTORY

Rodrigo M. filed a petition for a writ of habeas corpus after his arrest by federal immigration authorities. Respondents opposed the petition, arguing that detention was mandatory under 8 U.S.C. § 1225(b)(2) and independently authorized under § 1226(a), and submitted an arrest warrant. The court rejected application of mandatory detention under § 1225(b)(2), concluded that § 1226(a) authorized detention but required a bond hearing, and ordered that hearing by February 13, 2026.

DISPOSITION

other

REMAND INSTRUCTIONS

Respondents must provide Rodrigo M. with a bond hearing under 8 U.S.C. § 1226(a) by February 13, 2026, and must file an update by noon on February 14, 2026 demonstrating that the hearing occurred. The remainder of the petition was denied without prejudice.

CASES CITED

- Belsai D.S. v. Bondi, No. 25-cv-03682 (KMM/EMB), 2025 WL 2802947 (D. Minn. Oct. 1, 2025)
- Jose J.O.E. v. Bondi, 797 F. Supp. 3d 957, 961 (D. Minn. 2025)
- Jennings v. Rodriguez, 583 U.S. 281, 306 (2018)

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