

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Oscar C.M. v. Todd Lyons, et al.

Oscar C.M. · No. 1:25-cv-01915-TLN-SCR · Decided December 22, 2025

SUMMARY

The United States District Court for the Eastern District of California granted Oscar C.M.’s petition for a writ of habeas corpus challenging immigration detention without a bond hearing. The court held that 8 U.S.C. § 1226(a), rather than § 1225(b)(2), governed the petitioner’s detention and required a bond hearing. It also concluded that continued detention without an individualized hearing violated due process and ordered immediate release subject to a \$5,000 bond and alternatives to detention.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	Troy L. Nunley
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	December 22, 2025
DOCKET	1:25-cv-01915-TLN-SCR
DISPOSITION	writ_granted
PROCEDURAL POSTURE	Petition for writ of habeas corpus under 28 U.S.C. § 2241 challenging immigration detention without a bond hearing.
STANDARD OF REVIEW	Habeas review of the legality of federal custody; procedural due process analysis under the three-factor test of Mathews v. Eldridge.
PRECEDENTIAL VALUE	unpublished, nonprecedential district court order
PARTIES	Oscar C.M. v. Todd Lyons, Jason Knight, Kristi Noem, U.S. Department of Homeland Security, Pamela Bondi, Executive Office for Immigration Review, Christopher Chestnut

TOPICS

- immigration detention
- procedural due process
- statutory interpretation
- remedies
- special immigrant juvenile

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether 8 U.S.C. § 1225(b)(2), rather than 8 U.S.C. § 1226(a), authorized Petitioner's mandatory immigration detention without a bond hearing.
2. Whether continued immigration detention without an individualized custody hearing violated Petitioner's procedural due process rights.

HOLDINGS

1. Section 1225(b)(2) applies to noncitizens seeking admission, and Petitioner, who was living in the interior of the United States, was not an applicant seeking admission. Petitioner's detention was therefore governed by § 1226(a), which entitled him to the statutorily permitted process, including at least a bond hearing.
2. Petitioner's continued civil immigration detention without a hearing before a neutral decisionmaker violated the Due Process Clause because he had a protected liberty interest, the risk of erroneous deprivation was considerable, and the government's interest in detention without a hearing was negligible.

KEY QUOTATIONS

"For the reasons set forth below, Petitioner's petition is GRANTED." (at 1)

"For these reasons, the Court finds Petitioner is not an applicant 'seeking admission' subject to mandatory detention under § 1225(b)(2). Petitioner is subject to § 1226(a) and therefore he is entitled to the statutorily permitted process including a bond hearing at minimum." (at 4)

"Respondents must IMMEDIATELY RELEASE Petitioner Oscar C.M. from custody under the conditions set forth in the immigration judge's December 2, 2025, Order." (at 7)

FACTUAL BACKGROUND

Petitioner, a native and citizen of El Salvador, entered the United States on February 19, 2022, as an unaccompanied minor. His application for Special Immigrant Juvenile Status was approved in March 2024, and he was granted Deferred Action. After a misdemeanor arrest, he was taken into immigration custody in approximately November 2025. An immigration judge denied jurisdiction to consider bond under *Matter of Yajure Hurtado*, but alternatively found that Petitioner was neither a danger to the community nor a flight risk and would set bond at \$5,000 with alternatives to detention.

PROCEDURAL HISTORY

Petitioner filed a habeas petition on December 17, 2025, after being detained by immigration authorities and denied a bond hearing by an immigration judge. The court issued an order to show cause, Respondents filed a response, and Petitioner filed a reply. The court granted the petition and ordered immediate release subject to a \$5,000 bond and alternatives to detention.

DISPOSITION

writ_granted

REMAND INSTRUCTIONS

Respondents must immediately release Petitioner from custody under the conditions set forth in the immigration judge's December 2, 2025 order: a \$5,000 bond with alternatives to detention. The clerk was directed to enter judgment for Petitioner and close the case.

CASES CITED

- Matter of Yajure Hurtado, 291 I. & N. Dec. 216, 225 (BIA 2025)
- Hamdi v. Rumsfeld, 542 U.S. 507, 525 (2004)
- Preiser v. Rodriguez, 411 U.S. 475, 484 (1973)
- I.N.S. v. St. Cyr, 533 U.S. 289, 301 (2001)
- Zadvydas v. Davis, 533 U.S. 678, 687, 690, 693-94 (2001)
- Aroldo Rodriguez Diaz v. Merrick Garland, Rodriguez Diaz v. Garland, 53 F.4th 1189, 1196, 1202, 1206 (9th Cir. 2022)
- Hortua v. Chestnut, No. 1:25-cv-01670-TLN-JDP, 2025 WL 3525916 (E.D. Cal. Dec. 9, 2025)
- Barco Mercado v. Francis, No. 25-CV-6582 (LAK), 2025 WL 3295903, at *4 (S.D.N.Y. Nov. 26, 2025)
- Mirley Adriana Bautista Pico v. Noem, No. 25-CV-08002-JST, 2025 WL 3295382, at *2 (N.D. Cal. Nov. 26, 2025)
- Armando Modesto Estrada-Samayoa v. Cruz, No. 1:25-CV-01565-EFB (HC), 2025 WL 3268280, at *4 (E.D. Cal. Nov. 24, 2025)
- Salcedo Aceros v. Kaiser, No. 25-CV-06924-EMC, 2025 WL 2637503, at *6, *8 (N.D. Cal. Sept. 12, 2025)
- Lepe v. Andrews, No. 1:25-CV-01163-KES-SKO (HC), 2025 WL 2716910, at *4 (E.D. Cal. Sept. 23, 2025)
- Hernandez v. Session, 872 F.3d 976, 990, 994 (9th Cir. 2017)
- Demore v. Kim, 538 U.S. 510, 523 (2003)
- Kentucky Dep't of Corrections v. Thompson, 490 U.S. 454, 460 (1989)
- Morrissey v. Brewer, 408 U.S. 471, 481 (1972)
- Pinchi v. Noem, 792 F. Supp. 3d 1025, 1032 (N.D. Cal. July 24, 2025)
- Doe v. Becerra, 787 F. Supp. 3d 1083, 1094 (E.D. Cal. 2025)
- A.E. v. Andrews, No. 1:25-CV-00107-KES-SKO, 2025 WL 1424382, at *5 (E.D. Cal. May 16, 2025)
- R.D.T.M., 2025 WL 2686866, at *6
- Mathews v. Eldridge, 424 U.S. 319, 335 (1976)