

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
LOUISIANA, SHREVEPORT DIVISION

Muhammad Ali v. Judge S. Maurice Hicks, Jr., LaSalle Corrections
LLC, et al.

Ali · No. Civil Action No. 26-0364; 1:26-cv-00364 · Decided March 2, 2026

SUMMARY

The United States District Court for the Western District of Louisiana denied Muhammad Ali’s motion for a temporary restraining order and preliminary injunction. The court held that it lacked jurisdiction under 8 U.S.C. § 1252(g) to stay removal and declined to order immediate release or prohibit a potential transfer because those requests were either premature or unsupported by a sufficient showing of irreparable injury.

CASE DETAILS

COURT	United States District Court for the Western District of Louisiana, Shreveport Division
JURISDICTION	United States District Court for the Western District of Louisiana, Shreveport Division
DECIDED	March 2, 2026
DOCKET	Civil Action No. 26-0364; 1:26-cv-00364
DISPOSITION	other
PROCEDURAL POSTURE	Petitioner sought a temporary restraining order and preliminary injunction in connection with his pending federal habeas petition, requesting a stay of removal, an order prohibiting transfer outside the court's jurisdiction, and immediate release from immigration detention.
STANDARD OF REVIEW	Whether to grant or deny a temporary restraining order is committed to the district court's discretion. The movant must demonstrate a substantial likelihood of success on the merits, a substantial threat of irreparable injury, that the threatened injury outweighs the threatened harm to the opposing party, and that the injunction will not disserve the public interest.
PRECEDENTIAL VALUE	Unreported district-court memorandum order; precedential status not stated.

PARTIES

Muhammad Ali v. Judge S. Maurice Hicks, Jr., LaSalle Corrections LLC, et al.

TOPICS

immigration detention

injunctions

federal habeas corpus

removal proceedings

subject matter jurisdiction

PRACTICE AREAS

immigration

federal habeas corpus

injunctions

immigration detention

subject matter jurisdiction

QUESTIONS PRESENTED

1. Whether the district court had jurisdiction to stay Petitioner's removal while his habeas petition was pending.
2. Whether the court could grant immediate release through preliminary injunctive relief when that relief would effectively resolve the merits of the pending habeas petition.
3. Whether Petitioner established entitlement to an injunction prohibiting his transfer to another detention facility.
4. Whether Petitioner satisfied the requirements for a temporary restraining order or preliminary injunction.

HOLDINGS

1. The district court lacked jurisdiction to grant Petitioner's request for a stay of removal because the request challenged a removal order and was directly connected to the Attorney General's execution of a removal order.
2. The court declined to grant immediate release because doing so would effectively decide the merits of the habeas petition before development of a complete record.
3. Petitioner was not entitled to an injunction prohibiting his transfer because he failed to show a likelihood that he would be transferred and relied on speculation and conclusory allegations of irreparable injury.
4. The motion for a temporary restraining order and preliminary injunction was denied because Petitioner did not establish the requirements for extraordinary injunctive relief.

KEY QUOTATIONS

“An applicant for a Temporary Restraining Order must demonstrate each of the following: (1) a substantial likelihood his cause will succeed on the merits, (2) a substantial threat of irreparable injury if the injunction is not granted, (3) the threatened injury outweighs the threatened harm the injunction may do to the opposing party, and (4) granting the injunction will not disserve the public interest.”

“Thus, this Court is without jurisdiction to grant Petitioner’s request for stay of removal.”

FACTUAL BACKGROUND

Petitioner Muhammad Ali entered the United States without inspection and was detained in September 2024. An immigration judge granted him withholding of removal in March 2025, but he remained in custody at the River Correctional Center in Ferriday, Louisiana. In his pending habeas action, he sought immediate release, a stay of removal, and an order preventing his transfer outside the court's jurisdiction.

PROCEDURAL HISTORY

Petitioner entered the United States without inspection and was detained in September 2024. An immigration judge granted him withholding of removal in March 2025, but he remained detained. While his habeas petition was pending, he moved for emergency injunctive relief. The district court denied the motion.

DISPOSITION

other

CASES CITED

- Misquitta v. Warden Pine Prairie ICE Processing Center, 353 F. Supp. 518, 521 (W.D. La. Nov. 16, 2018)
- Piedmont Heights Civic Club, Inc. v. Moreland, 637 F.2d 430 (5th Cir. 1981)
- Moore v. Brown, 868 F.3d 398, 402 (5th Cir. 2017)
- Albright v. City of New Orleans, 46 F. Supp. 2d 523, 532 (E.D. La. 1999)
- Suburban Propane, L.P. v. D & S GCTX LLC, 2025 WL 2429087, at *2 (W.D. Tex. 2025)
- Anderson v. Jackson, 556 F.3d 351, 355–56 (5th Cir. 2009)
- Imran v. Harper, No. 25-30370, 2026 WL 93131, at *1 (5th Cir. Jan. 13, 2026)
- In re Asemani, 2025 WL 1823953, at *1 (4th Cir. July 2, 2025)
- Humphries v. Various Fed. USINS Emps., 164 F.3d 936, 943 (5th Cir. 1999)
- Fabuluje v. Immigration & Naturalization Agency, 244 F.3d 133, 133 (5th Cir. 2000) (unpublished)
- Idokogi v. Ashcroft, 66 F. App'x 526, 526 (5th Cir. 2003)
- Westley v. Harper, No. CV 25-229, 2025 WL 592788, at *4 (E.D. La. Feb. 24, 2025)
- Garcia-Aleman v. Thompson, No. 5:25-CV-00886, ECF No. 20 (S.D. Tex. Oct. 30, 2025)
- Lotter v. Lyons, 2025 WL 2946630, at *1 (W.D. Tex. Aug. 22, 2025)

OPINION

Ali

PER CURIAM.

UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF LOUISIANA

SHREVEPORT DIVISION

MUHAMMAD ALI CIVIL ACTION NO. 26-0364

VERSUS JUDGE S. MAURICE HICKS, JR.

LASALLE CORRECTIONS LLC, MAGISTRATE JUDGE HORNSBY

ET AL.

MEMORANDUM ORDER

Before the Court is Petitioner Muhammad Ali's ("Petitioner") Motion for Temporary Restraining Order and Preliminary Injunction (Record Document 7). Petitioner seeks an emergency hearing, order to show cause, and a temporary restraining order and preliminary injunction enjoining Respondents from removing him from the United States and transferring him outside the jurisdiction of this Court. See Record Document 7-1. He also seeks immediate release from detention pending adjudication of his Habeas Petition. See *id.* Petitioner is currently detained at the River Correctional Center in Ferriday, Louisiana. See *id.* at 5. According to the pleadings, Petitioner entered the United States without inspection and was detained in September 2024. See *id.* at 8. In March 2025, an Immigration Judge granted Petitioner withholding of removal. See *id.* Petitioner has remained in custody since that time. See Record Document 1 at 5. An applicant for a Temporary Restraining Order must demonstrate each of the following: (1) a substantial likelihood his cause will succeed on the merits, (2) a substantial threat of irreparable injury if the injunction is not granted, (3) the threatened injury outweighs the threatened harm the injunction may do to the opposing party, and (4) granting the injunction will not disserve the public interest. See *Misquitta v. Warden Pine Prairie ICE Processing Center*, 353 F. Supp. 518, 521 (W.D. La. Nov. 16, 2018) (citing *Piedmont Heights Civic Club, Inc. v. Moreland*, 637 F.2d 430 (5th Cir. 1981)). The decision of whether to grant or deny a TRO lies in the district court's discretion. See *Moore v. Brown*, 868 F.3d 398, 402 (5th Cir. 2017). Courts should deny such motions more often than not. See *Albright v. City of New Orleans*, 46 F.Supp.2d 523, 532 (E.D. La. 1999) (explaining that temporary restraining orders are "extraordinary relief and rarely issued."); see also *Suburban Propane, L.P. v. D & S GCTX LLC*, 2025 WL 2429087, at *2 (W.D. Tex. 2025) (holding that the extraordinary relief under Rule 65 must be "unequivocally show[n]."); see also *Anderson v. Jackson*, 556 F.3d 351, 355–56 (5th Cir. 2009) ("Only under 'extraordinary circumstances' will this court reverse the denial of a preliminary injunction."). Petitioner seeks a stay of removal while his Habeas petition remains pending. However, even if framed as seeking to preserve the status quo, a request for stay of removal is a challenge to a removal order. See *Imran v. Harper*, No. 25-30370, 2026 WL 93131, at *1 (5th Cir. Jan. 13, 2026), citing *In re Asemani*, 2025 WL 1823953, at *1 (4th Cir. July 2, 2025) (construing habeas petitioner's request for stay as seeking review of the final removal order). The Fifth Circuit recently reiterated that "federal courts lack jurisdiction over claims connected directly and immediately with a decision or action by the Attorney General to commence proceedings, adjudicate cases, or execute removal orders." *Id.*, citing *Humphries v. Various Fed. USINS Emps.*, 164 F.3d 936, 943 (5th Cir. 1999) and 8 U.S.C. § 1252(g) (internal quotations omitted). Thus, this Court is without jurisdiction to grant Petitioner's request for stay of removal. See *id.*, citing *Fabuluje v. Immigration & Naturalization Agency*, 244 F.3d 133, 133 (5th Cir. 2000) (unpublished) (holding that district court was without jurisdiction to grant stay of removal under § 1252(g)); *Idokogi v. Ashcroft*, 66 F. App'x 526, 526 (5th Cir. 2003) (same); see

also Westley v. Harper, No. CV 25-229, 2025 WL 592788, at *4 (E.D. La. Feb. 24, 2025). Petitioner also requests immediate release while his Habeas petition remains pending. However, a ruling granting release at this time would effectively resolve the merits of the Habeas Petition without the benefit of a developed record. Seeking injunctive relief that mirrors the relief requested in the habeas petition is nothing more than a motion to decide the habeas petition now. See Garcia-Aleman v. Thompson, No. 5:25-CV-00886, ECF No. 20 (S.D. Tex. Oct. 30, 2025). As for Petitioner's request that the government be prohibited from transferring him, "[m]ere speculation or conclusory allegations of an irreparable injury are insufficient to entitle a movant to injunctive relief." Lotter v. Lyons, 2025 WL 2946630, at *1 (W.D. Tex. Aug. 22, 2025). Petitioner has failed to show a likelihood that he will be transferred to another facility, and the Court is reluctant to set a precedent that would interfere with the government's need to transfer any immigration detainee with a pending habeas petition. Accordingly, IT IS ORDERED that Petitioner's Motion for Temporary Restraining Order and Preliminary Injunction (Record Document 7) is hereby DENIED. THUS DONE AND SIGNED, in Shreveport, Louisiana, this 2nd day of March, 2026. Kh Greewcveen. pl
UNITED STATES DISTRICT JUDGE