

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
MICHIGAN, SOUTHERN DIVISION

Nayeli Marisol Ruiz-Gonzalez v. Kevin Raycraft et al.

Ruiz-Gonzalez · No. 1:25-cv-1810 · Decided December 26, 2025

SUMMARY

The United States District Court for the Western District of Michigan conditionally granted Nayeli Marisol Ruiz-Gonzalez’s petition for a writ of habeas corpus under 28 U.S.C. § 2241. The court held that 8 U.S.C. § 1226(a), rather than § 1225(b)(2)(A), governs her detention and concluded that her mandatory detention violated the Fifth Amendment’s Due Process Clause. Respondents were ordered to provide a bond hearing within five business days or release her, and certain respondents were dismissed.

CASE DETAILS

COURT	United States District Court for the Western District of Michigan, Southern Division
WRITING FOR THE COURT	Hala Y. Jarbou
JURISDICTION	United States District Court for the Western District of Michigan, Southern Division
DECIDED	December 26, 2025
DOCKET	1:25-cv-1810
DISPOSITION	writ_granted
PROCEDURAL POSTURE	Petitioner sought habeas relief under 28 U.S.C. § 2241 challenging her immigration detention, the statutory basis for that detention, the denial of a bond hearing, and the identity of the proper respondents.
STANDARD OF REVIEW	The court reviewed the legality of petitioner's custody under 28 U.S.C. § 2241 and considered whether prudential exhaustion should be required or waived. The opinion does not state a separate formal standard-of-review formulation.
PRECEDENTIAL VALUE	District court opinion; no precedential designation stated.
PARTIES	Nayeli Marisol Ruiz-Gonzalez v. Kevin Raycraft et al.

TOPICS

immigration detention

removal proceedings

procedural due process

due process

statutory interpretation

PRACTICE AREAS

immigration

habeas corpus

constitutional law

civil procedure

QUESTIONS PRESENTED

1. Whether the court should require petitioner to exhaust administrative remedies before seeking § 2241 habeas relief.
2. Whether 8 U.S.C. § 1226(a), rather than the mandatory-detention provision in 8 U.S.C. § 1225(b)(2)(A), governs the detention of a noncitizen who had resided in the United States and was apprehended within the United States.
3. Whether petitioner's detention under the mandatory-detention framework of § 1225(b)(2)(A) violates the Fifth Amendment Due Process Clause.
4. Whether the Detroit ICE Field Office Director is the only proper respondent in a habeas action challenging immigration detention.
5. What relief should be granted on the § 2241 petition.

HOLDINGS

1. The court declined to enforce prudential exhaustion and held in the alternative that waiver of exhaustion was appropriate.
2. Section 1226(a), rather than 8 U.S.C. § 1225(b)(2)(A), governs the detention of a noncitizen who resided in the United States and was apprehended and arrested within the United States under the circumstances presented.
3. Petitioner's current detention under the mandatory-detention framework of § 1225(b)(2)(A) violated the Fifth Amendment Due Process Clause.
4. The Detroit ICE Field Office Director was not the only proper respondent. The court retained the Field Office Director and the Secretary of Homeland Security and dismissed the Department of Homeland Security, the Attorney General, and the Executive Office for Immigration Review.

KEY QUOTATIONS

“The Constitution guarantees that the writ of habeas corpus is “available to every individual detained within the United States.”” (Discussion III)

“The Court will order Respondents to provide Petitioner with a bond hearing under 8 U.S.C. § 1226(a) within five business days of the date of this Court’s opinion and judgment or, in the alternative, immediately release Petitioner from custody.” (Conclusion)

FACTUAL BACKGROUND

Petitioner is a Mexican national who entered the United States without inspection in 2002 at age three and later lived in Michigan with her six United States citizen children in a home she owns. After Detroit police detained her for vending food without a permit on September 14, 2025, ICE arrested her on October 3, 2025, and issued a notice to appear charging inadmissibility under INA §§ 212(a)(6)(A)(i) and 212(a)(7)(A)(i)(I). She was detained at the North Lake Processing Center and was scheduled for a master calendar hearing in the Detroit Immigration Court.

PROCEDURAL HISTORY

Petitioner filed a counseled § 2241 petition on December 16, 2025. The court ordered respondents to show cause, respondents filed a response, and petitioner filed a reply. The court conditionally granted the petition, ordered a bond hearing under 8 U.S.C. § 1226(a) within five business days or immediate release, required a compliance status report, and dismissed several respondents.

DISPOSITION

writ_granted

REMAND INSTRUCTIONS

Respondents must provide petitioner with a bond hearing under 8 U.S.C. § 1226(a) within five business days of the opinion and judgment, or immediately release her from custody. Respondents must file a status report within six business days certifying compliance and stating whether the hearing occurred, whether bond was granted or denied, the conditions of any bond, or the reasons for denial.

CASES CITED

- Hamdi v. Rumsfeld, 542 U.S. 507, 525 (2004)
- Zadvydas v. Davis, 533 U.S. 678, 687 (2001)
- A. A. R. P. v. Trump, 145 S. Ct. 1364, 1367 (2025)
- Antele Cobix v. Raycraft, No. 1:25-cv-1669, 2025 WL 3562651 (W.D. Mich. Dec. 12, 2025)
- Candela Bastidas v. Noem, No. 1:25-cv-1528, 2025 WL 3562638 (W.D. Mich. Dec. 12, 2025)
- Acuna Sanchez v. Noem, No. 1:25-cv-1442, 2025 WL 3562577 (W.D. Mich. Dec. 12, 2025)
- Penagos Robles v. U.S. Dep't of Homeland Sec., No. 1:25-cv-1578, 2025 WL 3558128 (W.D. Mich. Dec. 12, 2025)

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