

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
PENNSYLVANIA

Santana-Rivas v. Warden of Clinton County Correctional Facility, et
al.

Santana-Rivas v. Warden of Clinton County Correctional Facility, et al. · No. 3:25-CV-01896 · Decided
December 8, 2025

SUMMARY

The United States District Court for the Middle District of Pennsylvania partially adopted a magistrate judge’s report and recommendation in Marielis Santana-Rivas’s habeas corpus action challenging her immigration detention. The court held that it had jurisdiction to review the continued detention, that 8 U.S.C. § 1226(a), rather than § 1225, governed her detention, and that the detention had become unconstitutionally prolonged. The court declined to adopt the recommendation awarding attorney’s fees and costs under the Equal Access to Justice Act at that stage.

CASE DETAILS

COURT	United States District Court for the Middle District of Pennsylvania
WRITING FOR THE COURT	Jennifer P. Wilson
JURISDICTION	United States District Court for the Middle District of Pennsylvania
DECIDED	December 8, 2025
DOCKET	3:25-CV-01896
DISPOSITION	writ_granted
PROCEDURAL POSTURE	Petitioner sought habeas relief under 28 U.S.C. § 2241 challenging the statutory basis and duration of her immigration detention. A magistrate judge recommended granting the petition, ordering treatment under 8 U.S.C. § 1226(a), immediate release, prohibiting re-detention under 8 U.S.C. § 1225(b)(2)(A), and awarding EAJA fees and costs. The district court reviewed the parties' specific and general objections and adopted the recommendation in part.
STANDARD OF REVIEW	The district court conducts de novo review of contested portions of a magistrate judge's report and recommendation when timely and specific objections are made. General objections are reviewed for clear error or manifest injustice, and uncontested portions receive reasoned consideration.

PRECEDENTIAL VALUE	unpublished district court memorandum; nonprecedential
PARTIES	Marielis Santana-Rivas v. Warden of Clinton County Correctional Facility, et al.

TOPICS

immigration detention removal proceedings procedural due process subject matter jurisdiction
statutory interpretation

PRACTICE AREAS

immigration habeas corpus constitutional law civil procedure remedies

QUESTIONS PRESENTED

1. Whether the district court had jurisdiction under 28 U.S.C. § 2241 to review Petitioner's continued immigration detention notwithstanding 8 U.S.C. §§ 1252(g) and 1252(b)(9).
2. Whether 8 U.S.C. § 1225(b)(2)(A), rather than 8 U.S.C. § 1226(a), governed Petitioner's detention.
3. Whether Petitioner's approximately fifteen-month detention had become unconstitutionally prolonged.
4. Whether Respondents' argument that EAJA fees were premature required rejection of the magistrate judge's fee recommendation.

HOLDINGS

1. Sections 1252(g) and 1252(b)(9) did not strip the district court of jurisdiction under § 2241 to review Petitioner's ongoing detention.
2. Section 1225 was inapplicable to Petitioner, and her detention was governed by 8 U.S.C. § 1226(a). Respondents could not re-detain her under § 1225(b)(2)(A).
3. Petitioner's approximately fifteen-month immigration detention had become unconstitutionally prolonged.
4. The court declined to adopt the recommendation awarding attorney's fees and costs at that stage of the proceedings.

KEY QUOTATIONS

“does not present a jurisdictional bar.” (Doc. 15 at 12)

“violates the rule against surplusage and negates the plain meaning of the text.” (Doc. 15 at 27-30)

FACTUAL BACKGROUND

Marielis Santana-Rivas was detained in immigration custody for approximately fifteen months. An Immigration Judge had ordered her released under 8 U.S.C. § 1226(a), but Respondents continued to treat her as detained under 8 U.S.C. § 1225(b)(2)(A). She challenged the ongoing detention through a § 2241 habeas petition, and the

magistrate judge concluded that the detention was governed by § 1226(a), had become unconstitutionally prolonged, and warranted release.

PROCEDURAL HISTORY

Magistrate Judge Sean A. Camoni issued a report and recommendation recommending habeas relief and related injunctive relief. Respondents objected on jurisdictional, statutory-detention, constitutional-duration, and EAJA-fee grounds. The district court overruled the objections, adopted the report and recommendation regarding jurisdiction, the applicable detention statute, and prolonged detention, but declined to adopt the recommendation concerning an immediate EAJA fee award.

DISPOSITION

writ_granted

REMAND INSTRUCTIONS

The court adopted the report and recommendation in part, ordered relief consistent with treatment under 8 U.S.C. § 1226(a), including Petitioner's release and prohibition on re-detention under § 1225(b)(2)(A), but declined to award EAJA fees and costs at that time. An appropriate order was to follow.

CASES CITED

- Sample v. Diecks, 885 F.2d 1099, 1106 n.3 (3d Cir. 1989)
- Weidman v. Colvin, 164 F. Supp. 3d 650, 653 (M.D. Pa. 2015)
- Rieder v. Apfel, 115 F. Supp. 2d 496, 499 (M.D. Pa. 2000)
- Goney v. Clark, 749 F.2d 5, 6-7 (3d Cir. 1984)
- Boomer v. Lewis, No. 3:06-CV-00850, 2009 WL 2900778, at *1 (M.D. Pa. Sept. 9, 2009)
- EEOC v. City of Long Branch, 866 F.3d 93, 100 (3d Cir. 2017)
- Henderson v. Carlson, 812 F.2d 874, 878 (3d Cir. 1987)
- Jennings v. Rodriguez, 583 U.S. 281, 294-95 (2018)
- Talley v. Harry, No. 23-cv-1033, 2025 WL 1305052, at *2 (M.D. Pa. Mar. 28, 2025)
- Kelly v. Wells Fargo Bank, N.A., No. 13-cv-2298, 2015 WL 1333264, at *9 (M.D. Pa. Mar. 25, 2015)
- Abioye v. Warden Moshannon Valley Corr. Center, No. 24-3198 (3d Cir.)

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