

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
PENNSYLVANIA

Jashandeep Singh v. Todd M. Lyons, Acting Director, Immigration
and Customs Enforcement, et al.

Singh · No. 3:25cv2388 · Decided February 25, 2026

SUMMARY

The United States District Court for the Middle District of Pennsylvania sustains Jashandeep Singh’s objections to a magistrate judge’s recommendation and grants his habeas corpus petition under 28 U.S.C. § 2241. The court holds that Singh’s immigration detention is governed by the discretionary detention provision of 8 U.S.C. § 1226(a), rather than the mandatory detention provision of 8 U.S.C. § 1225(b)(2)(A). Respondents are ordered to provide a bond hearing within seven days or release Singh without bond or conditions, and Singh may seek attorneys’ fees and costs under the Equal Access to Justice Act.

CASE DETAILS

COURT	United States District Court for the Middle District of Pennsylvania
WRITING FOR THE COURT	Beulia K. Munley
JURISDICTION	United States District Court for the Middle District of Pennsylvania
DECIDED	February 25, 2026
DOCKET	3:25cv2388
DISPOSITION	writ_granted
PROCEDURAL POSTURE	Petitioner sought habeas relief under 28 U.S.C. § 2241 from immigration detention. After the chief magistrate judge recommended denying the petition, petitioner objected, and the district court conducted de novo review.
STANDARD OF REVIEW	De novo review of the portions of the report and recommendation to which objections were made under 28 U.S.C. § 636(b)(1)(C).
PRECEDENTIAL VALUE	Unknown; memorandum opinion from a federal district court with no reported citation.
PARTIES	Jashandeep Singh v. Todd M. Lyons, Acting Director, Immigration and Customs Enforcement, et al.

TOPICS

immigration detention

removal proceedings

statutory interpretation

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QUESTIONS PRESENTED

1. Whether Singh's interior immigration detention was governed by the mandatory-detention provision in 8 U.S.C. § 1225(b)(2)(A) or the discretionary-detention provision in § 1226(a).
2. Whether Singh was entitled to a bond hearing while detained under the applicable statutory provision.
3. Whether the district court had habeas jurisdiction under 28 U.S.C. § 2241.
4. Whether Singh could seek attorney's fees and costs under the Equal Access to Justice Act.

HOLDINGS

1. Section 1225(b)(2)(A) does not apply to Singh because he was not actively seeking admission at the border or port of entry; his detention was governed by 8 U.S.C. § 1226(a).
2. Because § 1226(a), rather than § 1225(b)(2)(A), governed Singh's detention, he was entitled to a bond hearing.
3. The court had jurisdiction under 28 U.S.C. § 2241 because Singh was detained within the court's territorial jurisdiction and alleged that his detention violated federal law and due process.
4. Singh was permitted to file a motion for attorney's fees and costs under the Equal Access to Justice Act within 30 days after entry of judgment.

KEY QUOTATIONS

“Under that reading, “for purposes of immigration detention, the border is now everywhere.”” (at 8)

“Thus, in short, the court reads “an alien seeking admission,” as the operative language of Section 1225(b)(2)(A). That is, “seeking admission” is the functional condition that triggers mandatory detention, not merely the definitional status of “applicant for admission” revealed by Section 1225(a)(1).” (at 9-10)

FACTUAL BACKGROUND

Singh, a citizen of India, entered the United States without admission or parole in November 2023 and was placed in removal proceedings under INA § 212(a)(6)(A)(i). He was released from border custody, later obtained employment as a truck driver, and filed a pending asylum application. ICE arrested him in November 2025 during a roadside inspection and detained him at Pike County Correctional Facility, relying on 8 U.S.C. § 1225(b)(2)(A).

PROCEDURAL HISTORY

Singh filed a § 2241 habeas petition challenging his detention without a bond hearing. Chief Magistrate Judge Daryl F. Bloom issued a report and recommendation recommending denial. Singh objected, and the district court sustained the objections, declined to adopt the R&R, granted the petition, and ordered respondents to provide a bond hearing within seven days or release Singh without bond or conditions.

DISPOSITION

writ_granted

REMAND INSTRUCTIONS

Respondents must provide Singh with a bond hearing within seven days. If they fail to do so, Singh must be released immediately on his own recognizance without bond or conditions pending further immigration proceedings. The government must also provide a sworn declaration.

CASES CITED

- Jennings v. Rodriguez, 583 U.S. 281, 288, 297, 303 (2018)
- Buenrostro-Mendez v. Bondi, No. 25-20496, 2026 WL 323330 (5th Cir. Feb. 6, 2026)
- Rumsfeld v. Padilla, 542 U.S. 426, 443 (2004)
- Trump v. J. G. G., 604 U.S. 670, 673 (2025)
- Reno v. Flores, 507 U.S. 292, 306 (1993)
- Mullane v. Central Hanover Bank & Trust Co., 339 U.S. 306, 313 (1950)
- Sullivan v. Cuyler, 723 F.2d 1077, 1085 (3d Cir. 1983)
- Henderson v. Carlson, 812 F.2d 874, 877 (3d Cir. 1987)
- Camreta v. Greene, 563 U.S. 692, 709 n.7 (2011)
- Shurtleff v. City of Boston, Massachusetts, 596 U.S. 243, 256 (2022)
- Diallo v. Rose, No. CV 25-7421, 2026 WL 36534, at *2 (E.D. Pa. Jan. 6, 2026)
- Almendarez-Torres v. United States, 523 U.S. 224, 234 (1998)
- Trainmen v. Baltimore & Ohio R. Co., 331 U.S. 519, 528-29 (1947)
- Lopez Benitez v. Francis, 795 F. Supp. 3d 475, 488-89 & n.7 (S.D.N.Y. 2025)
- Quispe v. Rose, 2025 WL 3537279, at *5-6 (M.D. Pa. Dec. 10, 2025)
- Patel v. O'Neill, 2025 WL 3516865, at *5 (M.D. Pa. Dec. 8, 2025)
- Centeno Ibarra v. Warden of the Fed. Det. Ctr. Philadelphia, No. CV 25-6312, 2025 WL 3294726, at *6 (E.D. Pa. Nov. 25, 2025)
- Zadvydas v. Davis, 533 U.S. 678, 690-93 (2001)
- Nielsen v. Preap, 586 U.S. 392, 397-98 (2019)
- Michelin v. Warden Moshannon Valley Corr. Ctr., No. 24-2990, 2026 WL 263483, at *1-2, *10 (3d Cir. Feb. 2, 2026)
- Vadel v. Lowe, No. 3:25-CV-02452, 2025 WL 3772059, at *1 n.1 (M.D. Pa. Dec. 31, 2025)

