

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
TEXAS, HOUSTON DIVISION

Ahmed Hassan-Ahmed v. Kristi Noem, et al.

Hassan-Ahmed · No. 4:25-CV-02985 · Decided January 27, 2026

SUMMARY

The United States District Court for the Southern District of Texas dismissed Ahmed Hassan-Ahmed’s petition challenging his immigration detention. The court concluded that the petition was moot because Hassan-Ahmed had been removed from the United States and was no longer in custody, and dismissed the petition without prejudice.

CASE DETAILS

COURT	United States District Court for the Southern District of Texas, Houston Division
JURISDICTION	United States District Court for the Southern District of Texas, Houston Division
DECIDED	January 27, 2026
DOCKET	4:25-CV-02985
DISPOSITION	dismissed
PROCEDURAL POSTURE	Petitioner sought habeas relief challenging his ongoing immigration custody. After the parties advised that he had been removed from the United States, the district court dismissed the petition without prejudice as moot.
STANDARD OF REVIEW	The court applied Article III mootness principles to determine whether a live case or controversy remained.
PRECEDENTIAL VALUE	District court order; precedential status not specified in the source.
PARTIES	Ahmed Hassan-Ahmed v. Kristi Noem, et al.

TOPICS

- immigration detention
- immigration
- removal proceedings
- civil procedure

PRACTICE AREAS

- Immigration law
- Federal habeas corpus
- Article III justiciability

QUESTIONS PRESENTED

1. Whether the petition challenging the petitioner's immigration custody became moot after the petitioner was removed from the United States and was no longer in custody.

HOLDINGS

1. The petition became moot because the petitioner was no longer in custody and no live case or controversy remained.

KEY QUOTATIONS

“Because the petitioner is no longer in custody and no controversy remains, his petition must be dismissed as moot.”

“no longer present[s] a case or controversy under Article III, § 2 of the Constitution” (983)

“The parties must continue to have a ‘personal stake in the outcome’ of the lawsuit” (983)

FACTUAL BACKGROUND

The petitioner was being held in immigration custody and filed a habeas petition challenging that custody. He was removed from the United States on December 3, 2025. Because he was no longer in custody, the court found that no ongoing controversy remained.

PROCEDURAL HISTORY

Ahmed Hassan-Ahmed filed a petition challenging his immigration detention. He was removed from the United States on December 3, 2025, and the parties notified the court. The court concluded that he was no longer in custody and that no live controversy remained, then dismissed the petition without prejudice as moot.

DISPOSITION

dismissed

CASES CITED

- Spencer v. Kemna, 118 S. Ct. 978, 983 (1998)
- Lewis v. Cont'l Bank Corp., 110 S. Ct. 1249, 1254 (1990)