

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
GEORGIA, COLUMBUS DIVISION

J.R.Z. v. Warden, Stewart Detention Center, et al.

J.R.Z. · No. 4:26-cv-068-CDL-CHW · Decided January 21, 2026

SUMMARY

The United States District Court for the Middle District of Georgia grants a habeas petition in part, holding that the petitioner is detained under 8 U.S.C. § 1226(a) rather than mandatory detention under 8 U.S.C. § 1225(b)(2). The court orders the respondents to provide a bond hearing to determine whether the petitioner may be released on bond under § 1226(a)(2) and applicable regulations.

CASE DETAILS

COURT	United States District Court for the Middle District of Georgia, Columbus Division
WRITING FOR THE COURT	Clay D. Land
JURISDICTION	United States District Court for the Middle District of Georgia, Columbus Division
DECIDED	January 21, 2026
DOCKET	4:26-cv-068-CDL-CHW
DISPOSITION	writ_granted
PROCEDURAL POSTURE	Petitioner sought habeas corpus relief under 28 U.S.C. § 2241 from immigration detention and requested a bond hearing and the opportunity for pre-removal release.
PRECEDENTIAL VALUE	unpublished, nonprecedential district court order
PARTIES	J.R.Z. v. Warden, Stewart Detention Center, et al.

TOPICS

- immigration detention
- federal habeas corpus
- removal proceedings
- immigration

PRACTICE AREAS

- immigration detention
- federal habeas corpus
- remedies

QUESTIONS PRESENTED

1. Whether Petitioner was subject to mandatory detention under 8 U.S.C. § 1225(b)(1) or § 1225(b)(2), or instead was detained under 8 U.S.C. § 1226(a).
2. Whether Petitioner was entitled to a bond hearing to determine eligibility for release under 8 U.S.C. § 1226(a)(2) and applicable regulations.

HOLDINGS

1. Petitioner was currently detained under 8 U.S.C. § 1226(a) and therefore was not subject to mandatory detention under 8 U.S.C. § 1225(b)(2).
2. Because Petitioner was detained under § 1226(a), Respondents were required to provide him with a bond hearing to determine whether he could be released on bond under § 1226(a)(2) and applicable regulations.

KEY QUOTATIONS

“The Court finds that Petitioner is currently detained under 8 U.S.C. § 1226(a) and therefore not subject to mandatory detention as required by 8 U.S.C. § 1225(b)(2).”

“Accordingly, Petitioner’s application for habeas corpus relief is granted to the extent that Respondents shall provide Petitioner with a bond hearing to determine if the Petitioner may be released on bond under § 1226(a)(2) and the applicable regulations.”

FACTUAL BACKGROUND

Petitioner was detained at the Stewart Detention Center while awaiting removal proceedings. He sought a bond hearing and pre-removal release. Respondents maintained that his detention was mandatory under the immigration detention provisions governing applicants for admission, but the court concluded that Petitioner was detained under 8 U.S.C. § 1226(a).

PROCEDURAL HISTORY

J.R.Z., detained at the Stewart Detention Center while awaiting removal proceedings, filed a § 2241 petition alleging that Respondents refused to provide a bond hearing. Respondents argued that detention was mandatory under 8 U.S.C. § 1225(b)(1) and/or § 1225(b)(2). The district court determined that Petitioner was detained under § 1226(a) and granted relief to the extent of ordering a bond hearing.

DISPOSITION

writ_granted

REMAND INSTRUCTIONS

Respondents shall provide Petitioner with a bond hearing to determine whether Petitioner may be released on bond under 8 U.S.C. § 1226(a)(2) and the applicable regulations.

CASES CITED

- J.A.M. v. Streeval, No. 4:25-CV-342-CDL, 2025 WL 3050094 (M.D. Ga. Nov. 1, 2025)
- P.R.S. v. Streeval, No. 4:25-CV-330-CDL, 2025 WL 3269947 (M.D. Ga. Nov. 24, 2025)
- Maldonado Bautista v. Santacruz, No. 5:25-CV-01873-SSS-BFM, 2025 WL 3713987 (C.D. Cal. Dec. 18, 2025)
- Rumsfeld v. Padilla, 542 U.S. 426, 446 (2004)

OPINION

STREEVAL

PER CURIAM.

IN THE UNITED STATES DISTRICT COURT

FOR THE MIDDLE DISTRICT OF GEORGIA

COLUMBUS DIVISION

J.R.Z., : Petitioner, : v. : Case No. 4:26-cv-068-CDL-CHW

: 28 U.S.C. § 2241

Warden, STEWART DETENTION : CENTER, et al., : Respondents. :

ORDER

Petitioner is a detainee at the Stewart Detention Center awaiting removal proceedings. Petitioner seeks habeas corpus relief based on Respondents' refusal to provide Petitioner with a bond hearing and the opportunity for pre-removal release while the removal proceedings are pending. Respondents contend that Petitioner's detention is mandatory under 8 U.S.C. § 1225(b)(1) and/or 8 U.S.C. § 1225(b)(2). The Court reviewed Petitioner's application. The Court finds that Petitioner is currently detained under 8 U.S.C. § 1226(a) and therefore not subject to mandatory detention as required by 8 U.S.C. § 1225(b)(2).¹ See J.A.M. v. Streeval, No. 4:25-CV- 342-CDL, 2025 WL 3050094 (M.D. Ga. Nov. 1, 2025); P.R.S. v. Streeval, No. 4:25-CV- 1 To the extent that the parties make arguments based on a belief that Petitioner is a member of the "Bond Eligible Class" certified in Maldonado Bautista v. Santacruz, No. 5:25-CV-01873-SSS-BFM, 2025 WL 3713987 (C.D. Cal. Dec. 18, 2025), any membership in that class has no effect on the Court's decision for several reasons. First, only the named petitioners sought habeas relief in Maldonado Bautista. Second, the named petitioners did not seek nationwide habeas relief. Third, in granting declaratory relief, the California District Court correctly noted that habeas relief could only be afforded to class members who were located within the boundaries of the Central District of California. *Id.* at *14 (citing *Rumsfeld v. Padilla*, 542 U.S. 426, 446 (2004) for the proposition that "habeas jurisdiction lie[s] 'in only one district: the district of confinement'"). 330-CDL, 2025 WL 3269947 (M.D. Ga. Nov. 24, 2025). Accordingly, Petitioner's application for habeas corpus relief is granted to the extent that Respondents shall provide Petitioner with a bond hearing to determine if the Petitioner may be released on bond under § 1226(a)(2) and the applicable regulations. See 8 C.F.R. §§ 236.1

& 1236.1.2 IT IS SO ORDERED, this 21st day of January, 2026. s/Clay D. Land

CLAY D. LAND

U.S. DISTRICT COURT JUDGE

MIDDLE DISTRICT OF GEORGIA

2 The brevity of this order is appropriate given that the issue presented is exactly the same as the issue previously decided on numerous occasions by the Court and yet Respondents insist upon denying the relief that the Court has found is required.