

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

Juan Correa-Luz v. Kevin Raycraft et al.

No. 1:26-cv-195 (W.D. Mich. Feb. 13, 2026) · No. 1:26-cv-195 · Decided February 13, 2026

SUMMARY

The United States District Court for the Western District of Michigan conditionally granted Juan Correa-Luz’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 the mandatory-detention provision in § 1225(b)(2)(A), governs his detention and ordered Respondents to provide a bond hearing within five business days or release him.

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	February 13, 2026
DOCKET	1:26-cv-195
DISPOSITION	writ_granted
PROCEDURAL POSTURE	Petitioner filed a counseled combined petition for a writ of habeas corpus under 28 U.S.C. § 2241 and a complaint seeking emergency injunctive relief. The court conditionally granted habeas relief and ordered a bond hearing or release.
PRECEDENTIAL VALUE	Nonprecedential district court opinion
PARTIES	Juan Correa-Luz v. Kevin Raycraft, Secretary for the Department of Homeland Security, Acting Director of ICE

TOPICS

- immigration detention
- procedural due process
- statutory interpretation
- removal proceedings
- civil procedure

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether prudential exhaustion of administrative remedies should be enforced before considering Petitioner's § 2241 challenge to immigration detention.
2. Whether 8 U.S.C. § 1225(b)(2)(A), rather than 8 U.S.C. § 1226(a), governs the detention of a noncitizen who has 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 ICE Detroit Field Office Director is the only proper Respondent in a § 2241 challenge to Petitioner's detention.

HOLDINGS

1. The court declined to enforce prudential exhaustion and alternatively concluded that waiver of exhaustion was appropriate.
2. Section 1226(a), not § 1225(b)(2)(A), governs detention of a noncitizen who has resided in the United States and was already within the United States when apprehended and arrested.
3. Petitioner's current detention under the mandatory-detention framework of § 1225(b)(2)(A) violates the Fifth Amendment Due Process Clause.
4. The ICE Detroit Field Office Director is not the only proper Respondent; the court retained the Field Office Director, the Secretary of Homeland Security, and the Acting Director of ICE.

KEY QUOTATIONS

“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

Juan Correa-Luz, a native and citizen of Mexico, entered the United States without inspection in 2001 and later resided in Michigan. He is married to a United States citizen, has an approved Form I-130 petition and Form I-601A provisional unlawful-presence waiver, and has three United States-citizen children; he has no criminal record. DHS arrested him on January 6, 2026, issued a notice to appear charging inadmissibility, and detained him at the North Lake Processing Center under the mandatory-detention framework of 8 U.S.C. § 1225(b)(2)(A).

PROCEDURAL HISTORY

After DHS arrested Petitioner on January 6, 2026, and initiated removal proceedings, Petitioner challenged his detention under § 2241. The court ordered Respondents to show cause, Respondents filed a response, and

Petitioner filed a reply. The court declined to enforce prudential exhaustion and conditionally granted the petition, ordering a bond hearing under 8 U.S.C. § 1226(a) within five business days or immediate release.

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 him. 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)
- Buenrostro-Mendez v. Bondi, No. 25-20496, 2026 WL 323330 (5th Cir. Feb. 6, 2026)