

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

Miguel Angel Caro Garcia v. Grant Dickey, et al.

No. 4:25-CV-06357, United States District Court for the Southern District of Texas, Houston Division (March 16, 2026)

SUMMARY

The United States District Court for the Southern District of Texas dismissed Miguel Angel Caro Garcia’s petition for a writ of habeas corpus under 28 U.S.C. § 2241. The court granted Respondents’ motion to dismiss because Garcia was no longer in custody, had been granted voluntary departure, and the case was moot; the dismissal was without prejudice and the case was closed.

CASE DETAILS

|                       |                                                                                                                                                                                                                 |
|-----------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| COURT                 | United States District Court for the Southern District of Texas, Houston Division                                                                                                                               |
| WRITING FOR THE COURT | Andrew S. Hanen                                                                                                                                                                                                 |
| JURISDICTION          | United States District Court for the Southern District of Texas, Houston Division                                                                                                                               |
| DECIDED               | March 16, 2026                                                                                                                                                                                                  |
| DOCKET                | 4:25-CV-06357                                                                                                                                                                                                   |
| DISPOSITION           | dismissed                                                                                                                                                                                                       |
| PROCEDURAL POSTURE    | Petitioner brought a petition for a writ of habeas corpus under 28 U.S.C. § 2241. Respondents moved to dismiss the petition as moot after petitioner was released from custody and granted voluntary departure. |
| STANDARD OF REVIEW    | The court determined whether an Article III case or controversy remained and whether the habeas petition was moot.                                                                                              |
| PRECEDENTIAL VALUE    | Unpublished district court order; precedential status is unknown                                                                                                                                                |
| PARTIES               | Miguel Angel Caro Garcia v. Grant Dickey, et al.                                                                                                                                                                |

TOPICS

- federal habeas corpus
- immigration detention
- immigration
- motions to dismiss
- civil procedure

## PRACTICE AREAS

Immigration detention

Federal habeas corpus

Mootness

## QUESTIONS PRESENTED

1. Whether the petition for a writ of habeas corpus under 28 U.S.C. § 2241 became moot after petitioner was released from custody and granted voluntary departure.
2. Whether the court should dismiss the moot petition without prejudice and close the case.

## HOLDINGS

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

## KEY QUOTATIONS

*“no longer present[s] a case or controversy under Article III, § 2 of the Constitution”* (1)

*“The parties must continue to have a ‘personal stake in the outcome’ of the lawsuit”* (1)

## FACTUAL BACKGROUND

When he filed the § 2241 petition, Miguel Angel Caro Garcia was detained in ICE custody at the Joe Corley Processing Center in Conroe, Texas. Respondents advised that he was no longer in custody and had been granted voluntary departure on January 24, 2026. Petitioner did not contest respondents' assertion that the case was moot.

## PROCEDURAL HISTORY

Petitioner filed a § 2241 habeas petition while detained by Immigration and Customs Enforcement at the Joe Corley Processing Center. Respondents moved to dismiss for mootness, stating that petitioner was no longer in custody and had been granted voluntary departure on January 24, 2026. Petitioner did not respond or dispute mootness. The court granted the motion, dismissed the petition without prejudice as moot, and closed the case.

## DISPOSITION

dismissed

## CASES CITED

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

## OPINION

Southern District of Texas ENTERED UNITED STATES DISTRICT COURT March 17, 2026  
SOUTHERN DISTRICT OF TEXAS Nathan Ochsner, Clerk HOUSTON DIVISION MIGUEL

ANGEL CARO GARCIA, § § Petitioner, § § VS. § CIVIL ACTION NO. 4:25-CV-06357 § GRANT DICKEY, et al., § § Respondents. § ORDER OF DISMISSAL At the time the petitioner, Miguel Angel Caro Garcia, filed this petition for a writ of habeas corpus under 28 U.S.C. § 2241, he was a detainee in the custody of United States Department of Homeland Security, Immigration and Customs Enforcement (“ICE”) officials at the Joe Corley Processing Center in Conroe, Texas.

Pending is Respondents’ motion to dismiss for mootness. Doc. No. 5. Petitioner has not filed a response and does not dispute that this case is moot. Respondents advise the Court that the petitioner is no longer in custody and was granted voluntary departure on January 24, 2026. *Jd.* at 2.

Because the petitioner is no longer in custody and no controversy remains, his petition must be dismissed as moot. See *Spencer v. Kemna*, 118 S. Ct. 978, 983 (1998) (holding that a case becomes moot if it “no longer present[s] a case or controversy under Article III, § 2 of the Constitution” because 1/2 “(t)he parties must continue to have a ‘personal stake in the outcome’ of the lawsuit”) (quoting *Lewis v. Cont’l*

*Bank Corp.*, 110 S. Ct. 1249, 1254 (1990)). Therefore, the Court ORDERS as follows: 1. Respondents’ motion to dismiss (Doc. No. 5) is GRANTED. 2. This habeas petition is DISMISSED without prejudice as MOOT. 3. This case is CLOSED.

The Clerk will enter this Order, providing a correct copy to all parties of record. tt SIGNED □□ this [6 \_ day of March 2026. 1 f \ \ \ ANDREW S. HANEN UNITED STATES DISTRICT JUDGE  
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