

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PRECEDENTIAL VALUE	Unpublished district court order; precedential status is unknown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)