

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
KENTUCKY, PADUCAH DIVISION

Ernesto Gerardo Zepeda Ramirez v. Adam Smith, et al.; Noel Isai
Samayoa v. Adam Smith, et al.

Nos. 5:25-cv-186-BJB and 5:25-cv-190-BJB (W.D. Ky. Jan. 28, 2026) · No. Nos. 5:25-cv-186-BJB and 5:25-cv-190-BJB · Decided January 28, 2026

SUMMARY

In consolidated habeas proceedings, the Western District of Kentucky considers whether a nationwide class judgment in *Bautista v. Santacruz* precludes federal immigration officials from relying on 8 U.S.C. § 1225(b)(2) to detain two long-term undocumented immigrants without bond hearings. The court concludes that the final, though appealed, *Bautista* judgment has preclusive effect against the federal respondents and that the Government has not identified another lawful basis for detention. The court allows the Government to file a supplemental response before ordering the petitioners’ release.

CASE DETAILS

COURT	United States District Court for the Western District of Kentucky, Paducah Division
WRITING FOR THE COURT	Benjamin Beaton
JURISDICTION	United States District Court for the Western District of Kentucky, Paducah Division
DECIDED	January 28, 2026
DOCKET	Nos. 5:25-cv-186-BJB and 5:25-cv-190-BJB
DISPOSITION	other
PROCEDURAL POSTURE	Petitioners sought federal habeas relief from immigration detention. After the Government relied on a new policy treating them as subject to mandatory detention under 8 U.S.C. § 1225(b)(2), Petitioners argued that a nationwide class judgment in <i>Bautista v. Santacruz</i> precluded that detention rationale.
STANDARD OF REVIEW	The court applied federal claim- and issue-preclusion principles to the effect of a final declaratory judgment and considered whether the Government had identified a lawful basis for detention under 28 U.S.C. § 2243.

PRECEDENTIAL VALUE	unpublished district court opinion and order
PARTIES	Ernesto Gerardo Zepeda Ramirez, Noel Isai Samayoa v. Adam Smith, et al.

TOPICS

immigration detention federal habeas corpus removal proceedings res judicata
judicial review of agency action

PRACTICE AREAS

immigration law habeas corpus civil procedure administrative law constitutional law

QUESTIONS PRESENTED

1. Whether a final nationwide class declaratory judgment in *Bautista v. Santacruz* precluded the Government from relitigating its mandatory-detention interpretation of 8 U.S.C. § 1225(b)(2) in these habeas cases.
2. Whether the pendency of the Government's appeal from *Bautista* eliminated or suspended the judgment's preclusive effect.
3. Whether the Government's collateral attacks on the rendering court's jurisdiction, the nationwide scope of the class declaration, and the propriety of declaratory relief permitted this court to disregard *Bautista*.
4. Whether the Government had identified any lawful basis for continuing Petitioners' detention apart from the mandatory-detention rationale rejected in *Bautista*.

HOLDINGS

1. A valid and final judgment on the merits precludes the same parties or their privies from relitigating issues that were or could have been raised, and this court must honor *Bautista*'s judgment as to issues fully and fairly litigated by the Government.
2. The Government's appeal from *Bautista* does not eliminate the judgment's preclusive effect unless and until the judgment is vacated or stayed by a court with appellate authority.
3. A trial court in a second forum may not use the Government's previously litigated jurisdictional objections to disregard a final judgment; jurisdictional issues fully and fairly litigated and finally determined in the rendering court are themselves generally precluded from collateral attack.
4. The Government may not satisfy its burden under 28 U.S.C. § 2243 by relying on the mandatory-detention interpretation of § 1225(b)(2) that *Bautista* rejected, although it may identify another lawful basis for detention.

KEY QUOTATIONS

"A final judgment on the merits of an action precludes the parties or their privies from relitigating issues that were or could have been raised in that action." (Opinion at preclusion discussion)

“A judgment merely voidable because based upon an erroneous view of the law is not open to collateral attack, but can be corrected only by a direct review.” (Opinion at preclusion discussion)

“Otherwise—unless and until the Bautista judgment is vacated or stayed by a court with appellate jurisdiction—the Government remains a party to a final judgment that precludes it from relitigating the issues decided, and this Court must honor that judgment so long as it has not been vacated.” (Opinion at conclusion)

FACTUAL BACKGROUND

Ramirez, a Mexican citizen who entered the United States without inspection around 2007, and Samayoa, a Guatemalan citizen who entered without inspection in 2002, had lived in the United States for many years. After ICE changed its policy, officers arrested both men and detained them at Christian County Jail while their removal proceedings continued. The Government relied principally on its interpretation of 8 U.S.C. § 1225(b)(2) as requiring mandatory detention without a bond hearing. A California district court had entered a nationwide class judgment declaring that policy unlawful and holding that § 1226(a) governed detention of class members not otherwise subject to specified mandatory-detention provisions.

PROCEDURAL HISTORY

Ramirez and Samayoa filed separate habeas petitions while detained at Christian County Jail during removal proceedings. The Government opposed relief and argued, among other things, that the California Bautista judgment had no preclusive effect outside the Central District of California. The court held that Bautista remained binding on the Government unless vacated or stayed, but allowed the Government a short opportunity to identify another lawful basis for detention or an additional reason why Bautista should not apply.

DISPOSITION

other

CASES CITED

- *Bautista v. Santacruz*, 2025 WL 3713987 (C.D. Cal. Dec. 18, 2025)
- *Federated Department Stores, Inc. v. Moitie*, 452 U.S. 394, 398–99 (1981)
- *Baltimore Steamship Co. v. Phillips*, 274 U.S. 316, 325 (1927)
- *Reed v. Allen*, 286 U.S. 191, 200 (1932)
- *Taylor v. Sturgell*, 553 U.S. 880, 892–93 (2008)
- *Sunshine Anthracite Coal Co. v. Adkins*, 310 U.S. 381 (1940)
- *Deposit Bank of Frankfort v. Board of Councilmen of City of Frankfort*, 191 U.S. 499, 510–12 (1903)
- *Rumsfeld v. Padilla*, 542 U.S. 426, 434 n.7, 442–43 (2004)
- *Calderon v. Ashmus*, 523 U.S. 740, 747, 749 (1998)
- *Rose v. Himely*, 4 Cranch 241, 269 (1808)
- *Treinies v. Sunshine Mining Co.*, 308 U.S. 66, 78 (1939)

- *Durfee v. Duke*, 375 U.S. 106, 116 (1963)
- *Parklane Hosiery Co. v. Shore*, 439 U.S. 322, 330–31 (1979)
- *Trump v. J.G.G.*, 604 U.S. 670, 672 (2025)
- *Trump v. CASA, Inc.*, 606 U.S. 831, 841–42, 850 (2025)
- *Garland v. Aleman Gonzalez*, *Garland v. Aleman Gonzalez*, 596 U.S. 543, 555 (2022)
- *Grupo Mexicano de Desarrollo S.A. v. Alliance Bond Fund, Inc.*, 527 U.S. 308, 318–19 (1999)
- *Coffman v. Breeze Corp.*, 323 U.S. 316, 323–24 (1945)
- *Jennings v. Rodriguez*, 583 U.S. 281, 313 (2018)
- *Wal-Mart Stores, Inc. v. Dukes*, 564 U.S. 338, 360 (2011)
- *United States v. Mendoza*, 464 U.S. 154, 159 (1984)
- *Boumediene v. Bush*, 553 U.S. 723, 740–41 (2008)
- *Does 1–3 v. Mills*, 142 S. Ct. 17, 18 (2021) (Barrett, J., concurring)
- *Khalil v. President of the United States*, 2026 WL 111933, at *9 (3d Cir. 2026)