

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
INDIANA

Marlon Josue Ramos-Medina a/k/a Darwin Javier Diaz Medina v.
Brian English, et al.

Marlon Josue Ramos-Medina a/k/a Darwin Javier Diaz Medina v. English, No. 3:26-CV-236-CCB-SJF (N.D.
Ind. Apr. 23, 2026) · No. 3:26-CV-236-CCB-SJF · Decided April 23, 2026

SUMMARY

The United States District Court for the Northern District of Indiana conditionally granted an immigration detainee’s 28 U.S.C. § 2241 petition. The court held that 8 U.S.C. § 1225(b)(2) did not mandate detention for a noncitizen arrested within the United States years after entry and that detention was instead governed by 8 U.S.C. § 1226(a). It ordered the respondents to provide an individualized bond hearing or release the petitioner by May 1, 2026, and declined to reach his constitutional claims.

CASE DETAILS

COURT	United States District Court for the Northern District of Indiana
WRITING FOR THE COURT	Cristal C. Brisco
JURISDICTION	United States District Court for the Northern District of Indiana
DECIDED	April 23, 2026
DOCKET	3:26-CV-236-CCB-SJF
DISPOSITION	writ_granted
PROCEDURAL POSTURE	Petition for a writ of habeas corpus under 28 U.S.C. § 2241 challenging immigration detention and seeking release or an individualized bond hearing.
STANDARD OF REVIEW	The court reviewed the legality of petitioner’s detention under § 2241 and exercised discretion over whether to require exhaustion of administrative remedies.
PRECEDENTIAL VALUE	unpublished district court opinion
PARTIES	Marlon Josue Ramos-Medina a/k/a Darwin Javier Diaz Medina v. Brian English, et al.

TOPICS

immigration detention

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PRACTICE AREAS

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QUESTIONS PRESENTED

1. Whether 8 U.S.C. § 1225(b)(2)'s mandatory-detention provision applies to a noncitizen who entered without inspection but was arrested by ICE in the interior of the United States years after arrival.
2. Whether petitioner was entitled to an individualized bond hearing under 8 U.S.C. § 1226(a).
3. Whether exhaustion of administrative remedies barred § 2241 relief.
4. Whether the court needed to decide petitioner's alternative Due Process Clause challenge or his argument concerning the allocation of the burden at a bond hearing.

HOLDINGS

1. The mandatory-detention provision in 8 U.S.C. § 1225(b)(2) does not apply to a noncitizen who is arrested within the interior of the United States years after arriving there rather than while seeking admission at a port of entry.
2. Because petitioner was arrested pursuant to a warrant and could not be detained under § 1225(b)(2), he was entitled to a prompt individualized bond hearing under 8 U.S.C. § 1226(a) and its implementing regulations.
3. Exhaustion did not bar petitioner from obtaining § 2241 relief because exhaustion is not statutorily mandated and pursuing an administrative bond request would have been futile under the government's categorical position that individuals like petitioner were ineligible for bond.

KEY QUOTATIONS

“The court reaffirms its holding that the mandatory detention provision in 8 U.S.C. § 1225(b)(2) does not apply to individuals like Mr. Medina who are arrested within the United States years after their arrival.”

“Therefore, Mr. Medina is entitled to a bond hearing in accordance with 8 U.S.C. § 1226 and its implementing regulations.”

FACTUAL BACKGROUND

Petitioner, a Honduran national, entered the United States without inspection in 2019 and was released to his aunt after being served with a notice to appear because he was seventeen years old. An immigration judge ordered him removed in 2024, but his appeal to the Board of Immigration Appeals remained pending. After a 2025 DUI arrest and conviction in Indiana, ICE arrested him in November 2025 under an administrative warrant and detained him without providing an opportunity for bond.

PROCEDURAL HISTORY

Petitioner filed a § 2241 habeas petition while detained by Immigration and Customs Enforcement at Miami Correctional Facility. The respondents answered and argued that the court lacked jurisdiction and that petitioner was subject to mandatory detention under 8 U.S.C. § 1225(b)(2), while petitioner submitted exhibits but no formal reply. The district court conditionally granted the petition and ordered release by May 1, 2026, unless respondents first provided an individualized bond hearing under 8 U.S.C. § 1226.

DISPOSITION

writ_granted

REMAND INSTRUCTIONS

Respondents must release petitioner on or before May 1, 2026, unless they first provide an individualized bond hearing pursuant to 8 U.S.C. § 1226 and corresponding regulations. The warden must file proof of compliance by May 4, 2026, and the clerk must email the order to the warden.

CASES CITED

- State v. Diaz Medina, No. 20H01-2508-CM-006194 (Elkhart City Ct. filed Aug. 7, 2025)
- De Jesús Aguilar v. English, No. 3:25-CV-898 DRL-SJF, 2025 WL 3280219 (N.D. Ind. Nov. 25, 2025)
- Mejia Diaz v. Noem, No. 3:25cv960, 2025 WL 3640419 (N.D. Ind. Dec. 16, 2025)
- Singh v. English, No. 3:25cv962, 2025 WL 3713715 (N.D. Ind. Dec. 23, 2025)
- Castanon-Nava v. U.S. Dep't of Homeland Sec., 161 F.4th 1048, 1061 (7th Cir. 2025)
- Buenrostro-Mendez v. Bondi, 166 F.4th 494 (5th Cir. 2026)
- Avila v. Bondi, 170 F.4th 1128 (8th Cir. 2026)
- Jennings v. Rodriguez, 583 U.S. 281, 303, 306 (2018)
- Cornejo Rivera v. Olson, No. 3:25-CV-1090-CCB-SJF, 2026 WL 81753 (N.D. Ind. Jan. 12, 2026)
- Gonzalez v. O'Connell, 355 F.3d 1010, 1016 (7th Cir. 2004)
- In re Yajure Hurtado, 29 I. & N. Dec. 216 (BIA 2025)
- Bautista v. Santacruz, No. 5:25-CV-01873-SSS-BFM, 2026 WL 468284 (C.D. Cal. Feb. 18, 2026)
- Maldonado Bautista, No. 26-1044 (9th Cir. order dated Mar. 31, 2026)
- K.C. v. Individual Members of Med. Licensing Bd. of Indiana, 121 F.4th 604, 631 (7th Cir. 2024)
- Johnson, 594 U.S. 527