

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
TEXAS, DALLAS DIVISION

Samuel John v. U.S. Immigration and Customs Enforcement

John · No. No. 3:25-CV-1844-B-BW · Decided February 6, 2026

SUMMARY

A United States magistrate judge recommends dismissing Samuel John’s amended 28 U.S.C. § 2241 habeas petition without prejudice as moot. The recommendation concludes that John’s claims challenging his immigration detention became moot after he was removed from the United States on December 16, 2025.

CASE DETAILS

COURT	United States District Court for the Northern District of Texas, Dallas Division
JURISDICTION	United States District Court for the Northern District of Texas, Dallas Division
DECIDED	February 6, 2026
DOCKET	No. 3:25-CV-1844-B-BW
DISPOSITION	dismissed
PROCEDURAL POSTURE	Petitioner brought an amended petition for a writ of habeas corpus under 28 U.S.C. § 2241 challenging prolonged immigration detention and seeking immediate release, injunctive relief, attorneys' fees, and costs. The magistrate judge recommended dismissal without prejudice as moot after petitioner was removed from the United States.
STANDARD OF REVIEW	Article III mootness and the continuing-controversy requirement; the magistrate judge recommended dismissal because no live controversy or legally cognizable interest remained after petitioner's removal.
PRECEDENTIAL VALUE	nonprecedential magistrate judge report and recommendation
PARTIES	Samuel John v. U.S. Immigration and Customs Enforcement

TOPICS

- federal habeas corpus
- immigration detention
- removal proceedings
- subject matter jurisdiction
- due process

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether John's § 2241 challenge to the lawfulness and duration of his immigration detention remained a live Article III controversy after he was removed from the United States.
2. Whether the amended habeas petition should be dismissed without prejudice as moot.

HOLDINGS

1. A habeas petition challenging only the lawfulness or duration of immigration detention is moot when the petitioner is no longer detained and has been removed from the United States.
2. The amended petition should be dismissed without prejudice as moot.

KEY QUOTATIONS

“A case becomes moot “when the issues presented are no longer ‘live’ or the parties lack a legally cognizable interest in the outcome.”” (at 2)

“Because Respondent’s evidence shows that John is no longer detained and has been removed from the United States, John’s claims challenging the lawfulness of his detention are moot.” (at 3)

FACTUAL BACKGROUND

Samuel John, an immigration detainee at the Prairieland Detention Center in Texas, challenged the duration of his detention under 8 U.S.C. § 1231(a)(6) and the Fifth Amendment Due Process Clause. He sought immediate release and related injunctive relief. Respondent's evidence showed that John was removed from the United States on December 16, 2025, and was no longer detained when the court considered the petition.

PROCEDURAL HISTORY

John filed an original § 2241 petition on July 15, 2025, and an amended petition on October 7, 2025. After online records suggested that he was no longer detained, the court ordered Respondent to address his custodial status. Respondent reported that John had been removed from the United States on December 16, 2025, and sought dismissal for lack of jurisdiction as moot. The magistrate judge issued findings, conclusions, and a recommendation that the amended petition be dismissed without prejudice.

DISPOSITION

dismissed

CASES CITED

- United States Parole Comm'n v. Geraghty, 445 U.S. 388, 395-96 (1980)
- Powell v. McCormack, 395 U.S. 486, 496 (1969)
- Spencer v. Kemna, 523 U.S. 1, 7 (1998)

- *Zadvydas v. Davis*, 533 U.S. 678, 701 (2001)
- *Francis v. Lynch*, 622 F. App'x 455, 455-56 (5th Cir. 2015)
- *Douglass v. United Services Automobile Ass'n*, 79 F.3d 1415, 1417 (5th Cir. 1996), modified by statute on other grounds

OPINION

John

PER CURIAM.

IN THE UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF TEXAS

DALLAS DIVISION

SAMUEL JOHN, §

A#035059892, § Petitioner, § § v. § No. 3:25-CV-1844-B-BW §

U.S. IMMIGRATION AND §

CUSTOMS ENFORCEMENT, §

Respondent. § Referred to U.S. Magistrate Judge1

FINDINGS, CONCLUSIONS, AND RECOMMENDATION

OF THE UNITED STATES MAGISTRATE JUDGE

Before the Court is the amended Petition for a Writ of Habeas Corpus Pursuant to 28 U.S.C. § 2241, received on October 7, 2025. (Dkt. No. 9.) Based on the relevant filings and applicable law, the Court should DISMISS the petition without prejudice as moot.

I. BACKGROUND

Samuel John, then an immigration detainee at the Prairieland Detention Center in Alvarado, Texas, filed his original habeas corpus petition under 28 U.S.C. § 2241 on July 15, 2025, claiming that his prolonged detention by United States Immigration and Customs Enforcement (“ICE”) violated 8 U.S.C. § 1231(a)(6) and his due process rights under the Fifth Amendment. (See Dkt. No. 3 at 6.) He sought immediate release from ICE custody. (See *id.* at 7.) Respondent filed a response in opposition to the § 2241 petition on September 4, 2025. (See Dkt. No. 6.) Instead of 1 By Special Order No. 3-251, this habeas case has been automatically referred for full case management. filing a reply, John filed an amended § 2241 petition on October 7, 2025, again alleging violations of § 1231(a)(6) and his due process rights and seeking immediate release from ICE custody; the amended petition also included requests for injunctive relief enjoining his detention and attorneys’ fees and costs. (See *id.* at 7-9.) Because it appeared to the Court from available online records that John was no longer in ICE custody, the Court entered an order on February 2, 2026 requiring Respondent to file a notice specifically addressing John’s current custodial status and its effect, if any, on his § 2241 petition. (See Dkt. No. 10.) On February 5, 2026, Respondent filed a status update seeking dismissal of the petition for lack of jurisdiction as moot based on John’s removal from the United States. (See Dkt. No. 11.) The supporting document submitted with Respondent’s

status update shows that John was removed from the United States on December 16, 2025. (See *id.* at 4- 6.)

II. MOOTNESS

“Article III of the Constitution limits . . . federal-court jurisdiction[] to ‘Cases’ and ‘Controversies.’” *United States Parole Comm’n v. Geraghty*, 445 U.S. 388, 395 (1980). A case becomes moot “when the issues presented are no longer ‘live’ or the parties lack a legally cognizable interest in the outcome.” *Id.* at 396 (quoting *Powell v. McCormack*, 395 U.S. 486, 496 (1969)). This case-or-controversy requirement subsists through all stages of federal judicial proceedings, trial and appellate The parties must continue to have a ‘personal stake in the outcome’ of the lawsuit. This means that, throughout the litigation, the plaintiff “must have suffered, or be threatened with, an actual injury traceable to the defendant and likely to be redressed by a favorable judicial decision. *Spencer v. Kemna*, 523 U.S. 1, 7 (1998) (internal citations and quotation marks omitted). Here, John contended that his immigration detention by ICE violated § 1231(a)(6) and the due process clause of the Fifth Amendment. (See Dkt. No. 9 at 7-8.) In *Zadvydas v. Davis*, 533 U.S. 678 (2001), the Supreme Court held that detention of an alien subject to a final order of removal is limited to a period reasonably necessary to bring about his removal from the United States, which is presumably six months, and that he must thereafter be released if “there is no significant likelihood of removal in the reasonably foreseeable future.” *Id.* at 701. John challenged only the lawfulness of his prolonged detention and sought immediate release from ICE custody. (See Dkt. No. 9 at 9.) Because Respondent’s evidence shows that John is no longer detained and has been removed from the United States, John’s claims challenging the lawfulness of his detention are moot. See, e.g., *Francis v. Lynch*, 622 F. App’x 455, 455-56 (5th Cir. 2015) (holding that the petitioner’s challenge to the duration of his detention pending removal became moot when he was removed from the United States). The Court therefore should dismiss John’s § 2241 petition as moot.

TI. RECOMMENDATION

The Court should DISMISS the amended Petition for a Writ of Habeas Corpus Pursuant to 28 U.S.C. § 2241, received on October 7, 2025 (Dkt. No. 9), without prejudice as moot. SO RECOMMENDED on February 6, 2026. af cKAY

UNIEED STATES MAGISTRATE JUDGE

INSTRUCTIONS FOR SERVICE AND

NOTICE OF RIGHT TO APPEAL/OBJECT

A copy of this report and recommendation will be served on all parties in the manner provided by law. Any party who objects to any part of this report and recommendation must file specific written objections within 14 days after being served with a copy. See 28 U.S.C. § 636(b)(1); FED. R. CIV. P. 72(b). To be specific, an objection must identify the finding or recommendation to which objection is made, state the basis for the objection, and indicate the place in the magistrate judge’s report and recommendation where the disputed determination is found. An objection that

merely incorporates by reference or refers to the briefing before the magistrate judge is not specific. Failure to file specific written objections will bar the aggrieved party from appealing the factual findings and legal conclusions of the magistrate judge that are accepted or adopted by the district court, except upon grounds of plain error. See *Douglass v. United Services Automobile Ass'n*, 79 F.3d 1415, 1417 (5th Cir. 1996), modified by statute on other grounds, 28 U.S.C. § 636(b)(1) (extending the time to file objections to 14 days).

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