

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

Edenilson Antonio Rivas-Muñoz v. Kristi Noem, et al.

Case No. 26-cv-00045-ABA (D. Md. Jan. 16, 2026) · No. Case No. 26-cv-00045-ABA · Decided January 16, 2026

SUMMARY

The United States District Court for the District of Maryland holds that Edenilson Antonio Rivas-Muñoz's detention is governed by 8 U.S.C. § 1226(a), rather than § 1225, based in part on the statutory authority identified in the immigration arrest warrant. The court grants the habeas petition in part and orders that Rivas-Muñoz receive a bond hearing before an immigration judge within 10 days, with release required if no hearing occurs within that period. The court denies the request for attorneys' fees, temporary restraining order, and the respondents' motion to dismiss.

CASE DETAILS

COURT	United States District Court for the District of Maryland
WRITING FOR THE COURT	Adam B. Abelson
JURISDICTION	United States District Court for the District of Maryland
DECIDED	January 16, 2026
DOCKET	Case No. 26-cv-00045-ABA
DISPOSITION	other
PROCEDURAL POSTURE	Petitioner sought habeas relief challenging his immigration detention and moved for a temporary restraining order seeking immediate release. Respondents moved to dismiss.
STANDARD OF REVIEW	The court applied a statutory interpretation analysis to determine whether 8 U.S.C. § 1225 or § 1226 governed the detention and considered the appropriate remedy for the statutory violation.
PRECEDENTIAL VALUE	unpublished
PARTIES	Edenilson Antonio Rivas-Muñoz v. Kristi Noem, et al.

TOPICS

- immigration detention
- statutory interpretation
- remedies
- civil procedure

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether Petitioner's detention was governed by the mandatory-detention provisions of 8 U.S.C. § 1225 or the discretionary-detention provisions of § 1226.
2. Whether Petitioner was entitled to a bond hearing before an immigration judge under § 1226(a).
3. Whether the appropriate remedy was a bond hearing within ten days rather than immediate release.
4. Whether Petitioner's motion for a temporary restraining order, Respondents' motion to dismiss, and request for attorneys' fees and costs should be granted.

HOLDINGS

1. Petitioner was not lawfully detained under 8 U.S.C. § 1225.
2. Because Petitioner was detained under 8 U.S.C. § 1226(a), he was entitled to a bond hearing before an immigration judge.
3. The appropriate remedy was to require Respondents to provide Petitioner with a bond hearing within ten days of the order, with release required if no hearing occurred within that period.

KEY QUOTATIONS

“To: Any immigration officer authorized pursuant to sections 236 and 287 of the Immigration and Nationality Act and part 287 of title 8, Code of Federal Regulations, to serve warrants of arrest for immigration violation.”

FACTUAL BACKGROUND

Edenilson Antonio Rivas-Muñoz alleged that he was a citizen of El Salvador who entered the United States around 2005 and had lived there continuously. ICE officers stopped and arrested him in Maryland after checking a vehicle registration and determining that his Maryland driver's license carried a federal-purpose restriction. After his arrest, ICE served him with a warrant referring to authority under sections 236 and 287 of the Immigration and Nationality Act. Respondents detained him under 8 U.S.C. § 1225(b)(2), while the court concluded that the warrant and circumstances placed his detention under § 1226(a).

PROCEDURAL HISTORY

After ICE arrested and detained Petitioner, he filed a habeas petition and a motion for a temporary restraining order. Respondents opposed the petition and moved to dismiss. The court granted the petition in part, denied it in part, denied the temporary restraining order, and denied the motion to dismiss.

DISPOSITION

other

REMAND INSTRUCTIONS

No remand was ordered. Respondents were ordered to provide Petitioner with a bond hearing before an immigration judge within ten days; if no hearing occurred within that period, Respondents were required to release Petitioner. The parties were also ordered to file a joint status report within fourteen days.

CASES CITED

- Bautista Villanueva v. Bondi, et al., Case No. 25-cv-4152-ABA, 2026 WL 100595 (D. Md. Jan. 14, 2026)
- Velasquez v. Noem, No. 25-cv-3215-GLR, 2025 WL 3003684, at *4 (D. Md. Oct. 27, 2025)
- Maldonado de Leon v. Baker, No. 25-cv-3084-TDC, 2025 WL 2968042, at *5 (D. Md. Oct. 21, 2025)

Retrieved from lawtools.ai · <https://lawtools.ai/cases/federal/united-states-district-court-for-the-district-of-maryland/2026/edenilson-antonio-rivas-munoz-v-kristi-noem-et-al-uj05drm8>