

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
TENNESSEE

Kevin Francisco Estrada Morales v. Christopher Bullock

Estrada Morales v. Bullock · No. 2:26-cv-02450-SHL-cgc · Decided May 19, 2026

SUMMARY

The United States District Court for the Western District of Tennessee granted Kevin Francisco Estrada Morales’s petition for a writ of habeas corpus under 28 U.S.C. § 2241. The court held that mandatory detention under 8 U.S.C. § 1225(b)(2)(A) did not apply because he was not actively seeking admission, and excused exhaustion of administrative remedies. The court ordered his immediate release, enjoined detention under that provision, and required a compliance status report.

CASE DETAILS

COURT	United States District Court for the Western District of Tennessee
WRITING FOR THE COURT	Thomas L. Parker
JURISDICTION	United States District Court for the Western District of Tennessee
DECIDED	May 19, 2026
DOCKET	2:26-cv-02450-SHL-cgc
DISPOSITION	writ_granted
PROCEDURAL POSTURE	Petition for a writ of habeas corpus under 28 U.S.C. § 2241 challenging continued immigration detention without a bond hearing.
PRECEDENTIAL VALUE	unpublished district court order; nonprecedential
PARTIES	Kevin Francisco Estrada Morales v. Christopher Bullock, New Orleans Field Office Director of Immigration and Customs Enforcement, Enforcement and Removal Operations

TOPICS

- immigration detention
- immigration
- removal proceedings
- injunctions
- statutory interpretation

PRACTICE AREAS

- immigration detention
- habeas corpus
- administrative exhaustion
- immigration remedies

QUESTIONS PRESENTED

1. Whether 8 U.S.C. § 1225(b)(2)(A) authorizes mandatory detention of an applicant for admission who is not actively seeking admission.
2. Whether the Court should require exhaustion of administrative remedies before deciding the § 2241 detention challenge.
3. Whether Estrada Morales was entitled to immediate release rather than a future custody redetermination hearing.

HOLDINGS

1. Section 1225(b)(2)(A)'s mandatory detention scheme does not apply to an applicant for admission who is not actively seeking admission; ICE therefore violated Estrada Morales's liberty interest by detaining him without a bond hearing under that provision.
2. Failure to exhaust administrative remedies is excused where the legal questions are fit for prompt judicial resolution and administrative exhaustion would be futile because the petitioner cannot obtain meaningful and timely relief.
3. Where ICE detained Estrada Morales under § 1225(b)(2)(A) without a bond hearing in violation of his liberty interest, he was entitled to immediate release rather than merely a future custody redetermination hearing.

KEY QUOTATIONS

*“that 8 U.S.C. § 1225(b)(2)(A)’s mandatory detention scheme does not apply to ‘applicants for admission’ who are not actively ‘seeking admission.’” (at *11)*

*“rightfully state[s] that [he has] a liberty interest to be free from detention.” (at *13)*

FACTUAL BACKGROUND

Estrada Morales, a citizen of Mexico, entered the United States in 2005 as a two-year-old and later graduated from a United States high school. His wife and six-month-old child are United States citizens. ICE detained him on March 12, 2026, at the Tipton County jail, where he had been held on a charge of driving without a license; he otherwise had no known criminal history. He remained detained at the West Tennessee Detention Facility without a bond hearing.

PROCEDURAL HISTORY

Estrada Morales filed a § 2241 petition on April 21, 2026, challenging his detention as an arriving alien and seeking immediate release. Respondent opposed the petition, but after the Court requested a position in light of *Lopez-Campos v. Raycraft*, Respondent conceded that decision controlled the outcome while arguing that administrative exhaustion should be required. The Court excused exhaustion, granted the petition, ordered immediate release, enjoined detention under 8 U.S.C. § 1225(b)(2)(A), and required a compliance status report.

DISPOSITION

writ_granted

REMAND INSTRUCTIONS

Respondent must release Petitioner immediately, refrain from pursuing Petitioner's detention under 8 U.S.C. § 1225(b)(2)(A), and file a status report within two business days certifying compliance.

CASES CITED

- Lopez-Campos v. Raycraft, 2026 WL 1283891 (6th Cir. 2026)
- McCarthy v. Madigan, 503 U.S. 140, 144 (1992)
- Lopez Soza v. U.S. Dep't of Homeland Sec., No. 26-CV-02224, 2026 WL 1104329, at *3 (W.D. Tenn. Apr. 23, 2026)
- Contreras-Lomeli v. Raycraft, No. 25-cv-12826, 2025 WL 2976739, at *3 (E.D. Mich. Oct. 21, 2025)
- Villafranca Lara v. Ladwig, No. 26-CV-02079, 2026 WL 401204, at *10 (W.D. Tenn. Feb. 12, 2026)

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