

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
FLORIDA, JACKSONVILLE DIVISION

Medilia Louis-Jeune, on behalf of William Charles v. Warden, Baker
County Correctional Institution, et al.

Louis-Jeune v. Warden · No. 3:26-cv-354-WWB-SJH · Decided February 20, 2026

SUMMARY

The United States District Court for the Middle District of Florida dismissed without prejudice a 28 U.S.C. § 2241 habeas petition filed by Medilia Louis-Jeune on behalf of William Charles, an ICE detainee. The court held that Louis-Jeune had not established next-friend standing and therefore lacked standing to initiate the action, and it denied a certificate of appealability.

CASE DETAILS

COURT	United States District Court for the Middle District of Florida, Jacksonville Division
JURISDICTION	United States District Court for the Middle District of Florida, Jacksonville Division
DECIDED	February 20, 2026
DOCKET	3:26-cv-354-WWB-SJH
DISPOSITION	dismissed
PROCEDURAL POSTURE	Petition for a writ of habeas corpus under 28 U.S.C. § 2241 filed on behalf of an immigration detainee, seeking immediate release or a bond hearing.
STANDARD OF REVIEW	The court determined whether the petitioner had standing to file the habeas petition as a next friend; no merits review of the detention claim was conducted.
PRECEDENTIAL VALUE	unpublished
PARTIES	Medilia Louis-Jeune, on behalf of William Charles v. Warden, Baker County Correctional Institution, et al.

TOPICS

- immigration detention
- federal habeas corpus
- standing
- due process
- procedural due process

PRACTICE AREAS

immigration detention

federal habeas corpus

civil procedure

constitutional law

QUESTIONS PRESENTED

1. Whether Medilia Louis-Jeune established the requirements to proceed as Charles's next friend under 28 U.S.C. § 2242.
2. Whether, absent next-friend status, Louis-Jeune had Article III standing to file a § 2241 petition on Charles's behalf.
3. Whether the petition should be dismissed without prejudice for lack of standing and jurisdiction.
4. Whether a certificate of appealability should issue.

HOLDINGS

1. A would-be next friend must adequately explain why the designation is necessary, such as by showing that the real party is mentally incompetent or lacks access to the courts. Louis-Jeune failed to make that showing.
2. Because Louis-Jeune did not establish next-friend status, she lacked Article III standing to initiate the habeas action on Charles's behalf.
3. The petition was dismissed without prejudice because Louis-Jeune lacked standing to bring it on Charles's behalf.
4. The court denied a certificate of appealability because the record did not warrant a finding that reasonable jurists could debate the court's assessment of the constitutional claims.

KEY QUOTATIONS

“But “‘[n]ext friend’ standing is by no means granted automatically”

“Because Louis-Jeune does not demonstrate the propriety of “next friend” status, she lacks standing to initiate this action on Charles’s behalf.”

FACTUAL BACKGROUND

William Charles was detained by Immigration and Customs Enforcement at Baker County Correctional Institution. Medilia Louis-Jeune alleged that ICE had detained Charles for ten months without a reasonably foreseeable removal and thereby violated his Due Process Clause rights. She sought Charles's immediate release or a bond hearing, but the petition did not show that Charles was mentally incompetent or unable to access the courts.

PROCEDURAL HISTORY

Medilia Louis-Jeune filed a § 2241 habeas petition on behalf of her husband, William Charles, who was detained by ICE at Baker County Correctional Institution. The district court concluded that Louis-Jeune had not established her entitlement to proceed as Charles's next friend and therefore lacked standing to initiate the action.

The court dismissed the case without prejudice, terminated pending motions as moot, closed the file, and denied a certificate of appealability.

DISPOSITION

dismissed

CASES CITED

- Whitmore v. Arkansas, 495 U.S. 149, 162–63 (1990)
- Francis v. Warden, FCC Coleman-USP, 246 F. App'x 621, 622 (11th Cir. 2007)
- Weber v. Garza, 570 F.2d 511, 514 (5th Cir. 1978)
- McNamara v. GEICO, 30 F.4th 1055, 1060–61 (11th Cir. 2022)
- Tennard v. Dretke, 542 U.S. 274, 282 (2004)
- Slack v. McDaniel, 529 U.S. 473, 484 (2000)
- Miller-El v. Cockrell, 537 U.S. 322, 335–36 (2003)
- Barefoot v. Estelle, 463 U.S. 880, 893 n.4 (1983)

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