

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
PENNSYLVANIA

Anibel Ernesto Lopez Sanibel v. Leonard Oddo, et al.

No. Civil No. 26-777, United States District Court for the Western District of Pennsylvania (May 18, 2026)

SUMMARY

The United States District Court for the Western District of Pennsylvania grants in part and denies in part a habeas petition challenging the detention of a Guatemalan national. The court holds that 8 U.S.C. § 1226(a), rather than the mandatory-detention provision of § 1225(b), governs the petitioner's detention and requires an individualized bond hearing. The court denies attorneys' fees under the Equal Access to Justice Act because the government's position was substantially justified.

CASE DETAILS

COURT	United States District Court for the Western District of Pennsylvania
WRITING FOR THE COURT	Joy Flowers Conti
JURISDICTION	United States District Court for the Western District of Pennsylvania
DECIDED	May 18, 2026
DOCKET	Civil No. 26-777
DISPOSITION	other
PROCEDURAL POSTURE	Petition for a writ of habeas corpus challenging immigration detention and seeking an individualized bond hearing, together with a request for attorney fees and expenses under the Equal Access to Justice Act.
STANDARD OF REVIEW	Statutory interpretation is reviewed de novo. Eligibility for EAJA fees turns on whether the government's position was substantially justified under 28 U.S.C. § 2412(d)(1)(A).
PRECEDENTIAL VALUE	Unknown; district court memorandum opinion
PARTIES	Anibel Ernesto Lopez Sanibel v. Leonard Oddo, et al.

TOPICS

- immigration detention
- statutory interpretation
- attorney fees
- immigration
- civil procedure

PRACTICE AREAS

immigration

habeas corpus

immigration detention

attorney fees

QUESTIONS PRESENTED

1. Whether Sanibel's detention is governed by the discretionary detention authority in 8 U.S.C. § 1226(a) or the mandatory detention provision in § 1225(b)(2).
2. Whether Sanibel is entitled to an individualized bond hearing.
3. Whether Sanibel is entitled to attorney fees and expenses under the Equal Access to Justice Act.

HOLDINGS

1. Section 1226(a), rather than the mandatory detention provision of § 1225(b)(2), governs the detention of a noncitizen similarly situated to Sanibel who is already present in the United States and is not seeking admission at a port of entry.
2. Because Sanibel's detention is governed by 8 U.S.C. § 1226(a), he has a statutory right to an individualized bond hearing before a neutral immigration judge.
3. Sanibel is not entitled to attorney fees and expenses under the Equal Access to Justice Act because the government's incorrect interpretation of the applicant-for-admission provision was substantially justified.

KEY QUOTATIONS

“Petitioner's detention is governed by § 1226(a) and the court concludes that he has a statutory right to an individualized bond hearing.”

“The court concludes that Respondents’ interpretation of § 1225(a), while incorrect, is substantially justified.”

FACTUAL BACKGROUND

Sanibel is a native and citizen of Guatemala who was detained in the interior of the United States. He argued that his detention was governed by the discretionary detention statute, 8 U.S.C. § 1226(a), rather than the mandatory detention provision applicable to certain applicants for admission under § 1225(b)(2). Respondents argued that the § 1225(a) definition of applicant for admission includes noncitizens who have already resided in the interior of the country.

PROCEDURAL HISTORY

Sanibel filed a petition for a writ of habeas corpus under 28 U.S.C. § 2241. Respondents opposed the petition, and the matter was submitted for decision. The court granted the petition in part by ordering an individualized bond hearing and denied the request for attorney fees and expenses.

DISPOSITION

other

REMAND INSTRUCTIONS

Within ten days of the order, Petitioner must receive an individualized bond hearing before a neutral immigration judge pursuant to 8 U.S.C. § 1226. Within seven days after the hearing, the parties must notify the court of its outcome. All additional relief, including attorney fees and expenses, is denied.

CASES CITED

- Jennings v. Rodriguez, 583 U.S. 281, 303 (2018)
- Bethancourt Soto v. Soto, No. 25-CV-16200, 2025 WL 2976572, at *2 (D.N.J. Oct. 22, 2025)
- Buenrostro-Mendez v. Bondi, 166 F.4th 494 (5th Cir. 2026)
- Avila v. Bondi, 2026 WL 819258 (8th Cir. Mar. 25, 2026)

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