

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
MICHIGAN, SOUTHERN DIVISION

Mingyuan Yu v. Kristi Noem et al.

Yu · No. 1:26-cv-292 · Decided March 4, 2026

SUMMARY

The United States District Court for the Western District of Michigan conditionally granted Mingyuan Yu’s petition for a writ of habeas corpus under 28 U.S.C. § 2241. The court held that 8 U.S.C. § 1226(a), rather than the mandatory-detention provision in § 1225(b)(2)(A), governs the detention of a noncitizen who entered on a visa and was apprehended within the United States, and concluded that the existing detention framework violated due process. Respondents were ordered to provide a bond hearing within five business days or release Yu, and the court dismissed the Attorney General and acting ICE Director as respondents.

CASE DETAILS

COURT	United States District Court for the Western District of Michigan, Southern Division
WRITING FOR THE COURT	Hala Y. Jarbou
JURISDICTION	United States District Court for the Western District of Michigan, Southern Division
DECIDED	March 4, 2026
DOCKET	1:26-cv-292
DISPOSITION	writ_granted
PROCEDURAL POSTURE	Petitioner sought habeas relief under 28 U.S.C. § 2241 challenging his immigration detention and requesting release or a bond hearing. The district court conditionally granted the petition, ordered a bond hearing under 8 U.S.C. § 1226(a) or immediate release, and dismissed two respondents.
STANDARD OF REVIEW	The court reviewed the legality of detention under 28 U.S.C. § 2241 and considered whether prudential exhaustion should be enforced. The opinion does not identify a separate formal standard of review.
PRECEDENTIAL VALUE	unpublished district court opinion
PARTIES	Mingyuan Yu v. Kristi Noem, Secretary for the Department of Homeland Security, ICE Detroit Field Office Director, Attorney

TOPICS

immigration detention removal proceedings procedural due process due process statutory interpretation

PRACTICE AREAS

immigration law habeas corpus immigration detention constitutional law

QUESTIONS PRESENTED

1. Whether prudential exhaustion should bar Yu's § 2241 challenge to his immigration detention.
2. Whether 8 U.S.C. § 1226(a), rather than the mandatory-detention provision in 8 U.S.C. § 1225(b)(2)(A), governs a noncitizen who was admitted on a visa, resided in the United States, and was apprehended within the country after overstaying or violating visa conditions.
3. Whether Yu's detention under the mandatory-detention framework of § 1225(b)(2)(A) violated the Fifth Amendment's Due Process Clause.
4. Whether the ICE Detroit Field Office Director was the only proper respondent in the habeas action.

HOLDINGS

1. The court declined to enforce prudential exhaustion against Yu and alternatively held that waiver of exhaustion was appropriate.
2. Section 1226(a), not 8 U.S.C. § 1225(b)(2)(A), governs a noncitizen such as Yu who was admitted on a visa, resided in the United States, and was apprehended and arrested within the country.
3. Yu's continued detention under the mandatory-detention framework of 8 U.S.C. § 1225(b)(2)(A) violated the Fifth Amendment's Due Process Clause.
4. The ICE Detroit Field Office Director was not the only proper respondent. The court retained the field office director and the Secretary for the Department of Homeland Security, and dismissed the Attorney General and the acting ICE Director.

KEY QUOTATIONS

“The Court concludes that § 1226(a), not § 1225(b)(2)(A), governs noncitizens, such as Petitioner, who have resided in the United States and were already within the United States when apprehended and arrested”
(Section V.A)

“The Court concludes that Petitioner’s current detention under the mandatory detention framework set forth in § 1225(b)(2)(A) violates Petitioner’s Fifth Amendment due process rights” (Section V.B)

“The Court will order Respondents to provide Petitioner with a bond hearing under 8 U.S.C. § 1226(a) within five business days of the date of this Court’s opinion and judgment” (Conclusion)

FACTUAL BACKGROUND

Mingyuan Yu, a citizen of China, entered the United States on an F-1 student visa in December 2016 and later applied for asylum based on religious persecution. Immigration officials encountered him on May 29, 2025, and charged him as admitted but removable because he had not attended school from 2017 through his detention and had exceeded the duration of his F-1 status. Immigration judges treated him as an arriving alien subject to mandatory detention under 8 U.S.C. § 1225(b), denied bond and a renewed custody request, and later denied asylum and other relief while granting voluntary departure; his appeal remained pending. Yu continued to be detained at the North Lake Processing Center.

PROCEDURAL HISTORY

Yu filed a § 2241 petition challenging his detention. The court ordered respondents to show cause; respondents filed a response and Yu filed a reply. An immigration judge previously denied bond, later denied a renewed custody request, and subsequently entered a removal order denying asylum and other relief; Yu's appeal from the removal order remained pending. The district court declined to enforce prudential exhaustion and granted conditional habeas relief.

DISPOSITION

writ_granted

REMAND INSTRUCTIONS

Respondents must provide Yu with a bond hearing under 8 U.S.C. § 1226(a) within five business days after the opinion and judgment, with notice to the parties as soon as practicable and no later than 24 hours before the hearing, or immediately release him from custody. Respondents must file a status report within six business days certifying compliance and stating whether a hearing occurred, whether bond was granted or denied, and the conditions or reasons for the decision.

CASES CITED

- Hamdi v. Rumsfeld, 542 U.S. 507, 525 (2004)
- Zadvydas v. Davis, 533 U.S. 678, 687 (2001)
- A. A. R. P. v. Trump, 145 S. Ct. 1364, 1367 (2025)
- Matter of Q. Li, 29 I&N Dec. 66 (BIA 2025)
- Antelex v. Raycraft, No. 1:25-cv-1669, 2025 WL 3562651 (W.D. Mich. Dec. 12, 2025)
- Candela Bastidas v. Noem, No. 1:25-cv-1528, 2025 WL 3562638 (W.D. Mich. Dec. 12, 2025)
- Acuna Sanchez v. Noem, No. 1:25-cv-1442, 2025 WL 3562577 (W.D. Mich. Dec. 12, 2025)
- Penagos Robles v. U.S. Dep't of Homeland Sec., No. 1:25-cv-1578, 2025 WL 3558128 (W.D. Mich. Dec. 12, 2025)
- Buenrostro-Mendez v. Bondi, 166 F.4th 494, 505 (5th Cir. 2026)

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