

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
PENNSYLVANIA

Carlos Alberto Amendano Sucuzhanay v. Todd Lyons, et al.

Sucuzhanay · No. Civil No. 26-1024 · Decided June 9, 2026

SUMMARY

The United States District Court for the Western District of Pennsylvania held that 8 U.S.C. § 1226(a), rather than the mandatory-detention provision of § 1225(b), governs the detention of a noncitizen who is already present in the United States and not seeking admission at a port of entry. The court granted the habeas petition in part and ordered an individualized bond hearing before a neutral immigration judge. It denied the petitioner's request for 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	June 9, 2026
DOCKET	Civil No. 26-1024
DISPOSITION	other
PROCEDURAL POSTURE	Petition for a writ of habeas corpus challenging the statutory basis for Petitioner's immigration detention and seeking an individualized bond hearing, with an additional request for attorneys' fees and expenses under the Equal Access to Justice Act.
STANDARD OF REVIEW	The court interpreted the governing immigration-detention statutes and applied the Equal Access to Justice Act's substantially-justified standard to the fee request.
PRECEDENTIAL VALUE	Nonprecedential district court memorandum opinion
PARTIES	Carlos Alberto Amendano Sucuzhanay v. Todd Lyons, et al.

TOPICS

- federal habeas corpus
- immigration detention
- statutory interpretation
- remedies

PRACTICE AREAS

Immigration

Federal habeas corpus

Immigration detention

Statutory interpretation

Remedies

QUESTIONS PRESENTED

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

KEY QUOTATIONS

“The court joins the other judges of this district in holding that § 1226(a), rather than the mandatory detention provision of § 1225(b), applies to aliens similarly situated to Petitioner, who are not seeking admission at a port of entry but rather are already present in the country.”

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

FACTUAL BACKGROUND

Sucuzhanay stated that he had been in the United States for 26 years and had two minor children who are United States citizens. He contended that his detention was discretionary under 8 U.S.C. § 1226(a), rather than mandatory under 8 U.S.C. § 1225(b)(2), because he was already present in the interior and was not seeking admission at a port of entry. The court accepted that statutory characterization for purposes of ordering a bond hearing but concluded that the government's contrary position was substantially justified for purposes of the EAJA.

PROCEDURAL HISTORY

Sucuzhanay filed a habeas petition under 28 U.S.C. § 2241. Respondents filed an opposition, and the petition became ripe for decision. The court granted the petition in part by ordering an individualized bond hearing and denied additional relief, including EAJA 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.

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, -- F.4th --, 2026 WL 819258 (8th Cir. Mar. 25, 2026)

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