

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

JUAN MARTINEZ OBLEA,

Petitioner,

v.

Kevin RAYCRAFT, et al.,

Respondents.

Case No. 25-CV-1473

**PETITIONER'S NOTICE OF MOOTNESS AND
MOTION TO DISMISS WITHOUT PREJUDICE**

Petitioner, **JUAN MARTINEZ OBLEA**, by and through counsel, **WILLIAM A. QUICENO**, respectfully notifies the Court that he has been released from U.S. Immigration and Customs Enforcement (“ICE”) custody and moves for dismissal of this action as moot. In support, Petitioner states as follows:

1. Petitioner filed the above-captioned Petition for Writ of Habeas Corpus under 28 U.S.C. § 2241 challenging the lawfulness of his immigration detention and seeking immediate release or, in the alternative, a constitutionally adequate bond hearing.
2. On or about November 24, 2025, Respondents granted Petitioner parole.
3. Petitioner was released from ICE custody and returned home to Illinois with his family. Accordingly, the relief sought in the habeas petition has been achieved.
4. Because Petitioner is no longer “in custody,” the issues raised in Claim II of this

matter are now moot. See *Spencer v. Kemna*, 523 U.S. 1, 7 (1998) (“Once the convict’s sentence has expired, some concrete and continuing injury other than the now-ended incarceration must exist if the suit is to be maintained.”).

5. Dismissal of Claim II without prejudice is appropriate so that Petitioner may renew his claims should he later be re-detained under similar circumstances. See *Hernandez-Lara v. Lyons*, 10 F.4th 19 (1st Cir. 2021) (recognizing habeas challenges to detention become moot upon release).
6. Because Claim I substantially overlaps with the relief contemplated under the pending *Castañon-Nava v. DHS settlement*, Petitioner agrees that this Court may decline to reach that claim at this time. A dismissal without prejudice of Claim I would not prejudice Petitioner’s rights and would permit any potential relief to be resolved through the *Nava* process in the first instance.

WHEREFORE, the Petitioner prays that this Honorable Court grant the following relief:

- (a) Dismiss this case without prejudice as moot;
- (c) Direct the Clerk to close the case; and
- (d) Grant such further relief as the Court deems just and proper.

Dated: November 24, 2025
Chicago, Illinois

William A. Quiceno
Attorney at Law
Kempster Corcoran, Quiceno & Lenz-Calvo, Ltd.

/s/William A Quiceno
William A Quiceno
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CERTIFICATE OF SERVICE

I hereby certify that on November 24, 2025, I electronically filed the foregoing document with the Clerk of the Court for the United States District Court for the Northern District of Illinois by using the CM/ECF system. All parties to this case are registered CM/ECF users and will be served through the CM/ECF system.

Dated: November 24, 2025
Chicago, Illinois

Respectfully submitted,

/s/ William A. Quiceno
William A. Quiceno
Attorney for Petitioner

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