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UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
WAYCROSS DIVISION

Mukeshbhai Lallubhai Patel (A[redacted] Petitioner, **GEORGE STERLING**, Deputy Managing Director, Atlanta Field Office, Immigration and Customs Enforcement And Removal Operations ("ICE/ERO"); **TODD LYONS**, Acting Director of Immigration and Customs Enforcement ("ICE"); U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT; **KRISTI NOEM**, Secretary of the Department of Homeland Security ("DHS"); U.S. DEPARTMENT OF HOMELAND SECURITY; **PAMELA BONDI**, Attorney General of the United States; **Warden**, Folkston ICE Processing Center, United States Attorney. Respondents,	Case No. **PETITON FOR WRIT HABEAS CORPUS**

Petitioner, Mukeshbhai Lallubhai Patel (hereinafter "the Petitioner" or "Mr. Patel") files Petition for Habeas Corpus and Complaint for Declaratory and Injunctive Relief, under 28 U.S.C. §§2241, (habeas corpus) 1331 (federal question), with the Administrative Procedure Act, 5 U.S.C. §702 et seq; 28 U.S.C. §2201 (Declaratory Judgment Act).

I. INTRODUCTION

1. Petitioner Mukeshbhai Lallubhai Patel, by and through undersigned counsel, petitions this Court for a writ of habeas corpus pursuant to 28 U.S.C. § 2241 and seeks declaratory and injunctive relief to remedy his unlawful detention by U.S. Immigration and Customs

Enforcement (ICE). Petitioner is an "arriving alien" who was paroled into the United States, a status that categorically disqualifies him from a bond hearing before an immigration judge. *8 CFR § 235.3*. As a result, he has been detained without any opportunity for a bond determination, in violation of his rights under the Due Process Clause of the Fifth Amendment. Petitioner's continued civil detention serves no legitimate purpose. He is neither a flight risk nor a danger to the community, yet he remains imprisoned indefinitely with no administrative mechanism to seek release.

2. Petitioner is a native of India who has resided in the United States for over 30 years. He entered the U.S. on or about October 25, 1992, and was inspected and paroled in; however, he was subsequently ordered removed (in **exclusion** proceedings) on February 9, 1993. Despite this decades-old removal order, Petitioner has made every effort to legalize his status through the proper channels. He married his wife, **Ishita Patel**, a United States citizen, in 2009. *Please see* **Exhibit A**, Copy of USC wife Naturalization certificate, US passport and Marriage Certificate. Mrs. Patel filed an I-130 Petition for Alien Relative on his behalf, which was approved on January 23, 2019. *Please see* **Exhibit B**, I-130 Approval Notice.

3. Petitioner also filed an application for Adjustment of Status (Form I-485) on May 7, 2018, along with an accompanying Waiver of Inadmissibility (Form I-601) to address the grounds of inadmissibility under INA §212(a)(6)(C). Both the I-485 and I-601 applications have now been pending with U.S. Citizenship and Immigration Services (USCIS) for over seven years. Please see **Exhibit C**, I-485 Receipt Notice; and *Please see* **Exhibit D**, I-601 Receipt Notice. These unusually prolonged pending applications reflect USCIS's holding of the case in abeyance due to Mr. Patel's prior removal order.

4. In light of the approved visa petition and new evidence, Petitioner filed Joint motion to reopen and terminate as well as motion to reopen and terminate his removal proceedings based on approved I-130 petition which is currently pending with the Immigration court. *Please see* **Exhibit E**, Copy of Automated Case Information. Throughout these proceedings, Petitioner has been compliant with all ICE requirements and has never attempted to abscond. He has continuously maintained contact with DHS – for instance, he has attended check-ins as required and has been open about his address and activities (indeed, ICE has been aware of his location at all times). Importantly, Petitioner has no criminal history whatsoever and has demonstrated good moral character. He is a family man and a caretaker, not a flight risk or danger to the community. Additionally, Mr. Patel's US citizen wife Ishita Patel is ill and need medical care and support of Mr. Patel. *Please see* **Exhibit F**, Copy of her medical report. On November 19, 2025, ICE detained him and he is currently detained in Folkston ICE Processing Centre, Folkston, GA.

5. Petitioner's detention is especially egregious given his unique circumstances. He has deep ties to the United States, including a U.S. citizen spouse who depends on him for care, and he is pursuing lawful permanent residence through a pending adjustment of status application. In fact, Petitioner has an approved I-130 visa petition (Petition for Alien Relative) filed by his U.S. citizen wife, and a corresponding I-485 Application to Adjust Status and I-601 Application for Waiver of Inadmissibility that have been pending with U.S. Citizenship and Immigration Services (USCIS) for over seven years without adjudication. *Please see again* **Exhibit B and C**, Copy of I-130 approval notice, I-485 Receipt Notice and I-601 Receipt Notice. Despite this clear pathway to lawful status, ICE continues to detain Petitioner even in the face of extraordinary humanitarian factors.

Petitioner's US citizen wife Ishita Patel suffers from a serious psychiatric and neurological illness and is wholly dependent on Petitioner as her primary caregiver. *Please see again* **Exhibit F**. Petitioner has no criminal history and has lived in the U.S. for decades.

6. Because Immigration judges lack jurisdiction to consider Petitioner's release on bond, habeas corpus is Petitioner's sole avenue for relief. Petitioner asks this Court to order his immediate release from custody or, at a minimum, order that he receive a prompt individualized bond hearing. Petitioner also seeks a temporary restraining order (TRO) and preliminary injunction barring Respondents from removing him from the United States during the pendency of these habeas proceedings and until a final resolution of his pending motion to reopen his removal proceedings which has been filed. Such relief is necessary to preserve the Court's jurisdiction and to prevent irreparable harm, as ICE could otherwise execute Petitioner's removal at any time despite his meritorious efforts to reopen his case and obtain lawful status.

II. JURISDICTION AND VENUE

7. This Court has subject matter jurisdiction over this petition pursuant to *28 U.S.C. § 2241*, which authorizes district courts to grant habeas corpus relief to persons who are "*in custody in violation of the Constitution or laws or treaties of the United States*". Petitioner is presently in custody under color of federal immigration authority, and he asserts that his detention violates the Due Process Clause of the Fifth Amendment and the Immigration and Nationality Act (INA). The Court additionally has jurisdiction under 28 U.S.C. § 1331 (federal question jurisdiction) to consider claims arising under the U.S.

Constitution and federal law, as well as under the *Administrative Procedure Act, 5 U.S.C. § 702*, to the extent applicable, because Petitioner challenges the legality of Respondents' actions and seeks injunctive relief. Petitioner invokes the *Suspension Clause, U.S. Const. art. I § 9, cl. 2*, which guarantees the availability of habeas corpus review of executive detention. No statute strips this Court of jurisdiction to hear Petitioner's claims, and *8 U.S.C. § 1252* does not deprive the Court of jurisdiction because Petitioner does not seek review of a final order of removal; rather, he challenges only the legality of his detention and the failure to afford a bond hearing, matters which squarely fall within *8 U.S.C. § 2241* habeas jurisdiction.

8. Petitioner is "in custody" for purposes of habeas corpus because he is presently detained at the Folkston ICE Processing Center under the authority of Respondents. Petitioner has no other adequate or available remedy to secure his release. By law, arriving aliens and those deemed "applicants for admission" are categorically ineligible for bond hearings before an immigration judge, and ICE alone controls their custody. Petitioner has exhausted any possible administrative remedies to the extent they exist. There is no statutory exhaustion requirement for immigration habeas claims under *8 U.S.C. § 2241*, and in any event further requests to ICE would be futile. Petitioner has thus properly invoked this Court's habeas jurisdiction after being detained for an unreasonably prolonged period with no other forum available to adjudicate his release.

9. Venue is proper in the Southern District of Georgia, Waycross Division, under *28 U.S.C. § 1391* and *28 U.S.C. § 2241(d)*. Petitioner is detained at the Folkston ICE Processing Center in Charlton County, Georgia, which lies within this District and Division.

Accordingly, the Southern District of Georgia is the appropriate venue to hear this Petition.

III. PARTIES

10. Petitioner Mukeshbhai Lallubhai Patel is a 57-year-old native and citizen of India (A# [redacted]). He has resided in the United States for over 30 years, building a life, family, and community here. Petitioner entered the United States on or about October 25, 1992 and was inspected and paroled into the country under *INA § 212(d)(5)* after presenting an altered passport at the port of entry. He has lived continuously in the U.S. since that date. Petitioner is married to a U.S. citizen, Mrs. Ishita Patel, and they have been legally married since November 25, 2009. *Please see again* **Exhibit A**. Petitioner currently remains in the custody of ICE at Folkston ICE Processing Center in Folkston, Georgia.

11. Respondent George Sterling is the Deputy Managing Director, Atlanta ICE Field Office. The Atlanta Field Office is responsible for local custody decisions relating to non-citizens charges with being removable from the United States, including the arrest, detention, and custody status of non-citizens. Respondent Sterling is a legal custodian of the Petitioner.

12. Respondent Todd Lyons is the Acting Director of U.S. Immigration and Customs Enforcement. In this capacity, Respondent Lyons has ultimate responsibility for ICE's policies and operations, including the detention and release of noncitizens in removal proceedings. He is sued in his official capacity.

13. Respondent Kristi Noem is the Secretary of the U.S. Department of Homeland Security (DHS), the Cabinet official charged with overall authority for the administration and

enforcement of the immigration laws. Respondent Noem, through her delegates in DHS and ICE, has ultimate legal custody of Petitioner. She is sued in her official capacity.

14. Respondent Pamela Bondi is the Attorney General of the United States and head of the U.S. Department of Justice, which encompasses the Executive Office for Immigration Review (the immigration courts and Board of Immigration Appeals). She is sued in her official capacity as the nation's chief legal officer, as a nominal respondent insofar as Petitioner's claims may implicate the application of immigration statutes and regulations.

15. Respondent U.S. Immigration and Customs Enforcement (ICE) is the federal agency within the Department of Homeland Security that is detaining Petitioner. ICE is a proper respondent for purposes of injunctive and declaratory relief.

16. Respondent U.S. Department of Homeland Security is the federal department responsible for enforcing immigration laws and detaining noncitizens, and under whose authority Petitioner is currently held. DHS is named as a respondent for purposes of injunctive relief.

17. Respondent Warden of the Folkston ICE Processing Center in Folkston, Georgia, where Petitioner is currently detained. As Warden, Respondent is the local official having day-to-day custody over Petitioner and is a proper respondent in a habeas action. Respondent is sued in his official capacity.

IV. LEGAL FRAMEWORK

18. Immigration detention is civil in nature and is not intended to be punitive. The U.S. Supreme Court has recognized that civil detention of noncitizens is justified only as a means to the ends of the immigration process – ensuring the person's appearance at

removal proceedings and, if a final removal order is entered, effectuating that removal. Detention should be "limited to situations where it is necessary" to serve those purposes, i.e. to prevent flight or danger to the community. Otherwise, detention becomes an arbitrary punishment, forbidden by the Fifth Amendment. Indeed, civil immigration confinement "constitutes a significant deprivation of liberty" that triggers due process protection. Noncitizens in removal proceedings are entitled to due process of law under the Fifth Amendment, which includes both substantive limits on executive detention power and procedural guarantees of a meaningful opportunity to challenge one's confinement.

19. Under the Immigration and Nationality Act (INA), the detention of noncitizens pending removal proceedings is governed primarily by 8 U.S.C. § 1226 for those already "in the United States," and by 8 U.S.C. § 1225(b) for those deemed applicants for admission (including "arriving aliens" at ports of entry). Generally, *§ 1226(a)* allows the Attorney General (now the DHS Secretary) discretion to arrest and detain a noncitizen pending removal proceedings, but also authorizes release on bond or conditional parole pending the outcome of the case, unless the person falls under certain mandatory detention categories (e.g. criminal aliens under § 1226(c)). When a person is detained under § 1226(a), he or she has the right to seek a custody redetermination (bond hearing) before an immigration judge, who can grant release if the individual does not pose a flight risk or danger. These bond determinations are case-by-case and require consideration of individualized factors such as family ties, community ties, and background.

20. In contrast, 8 U.S.C. § 1225(b) applies to "applicants for admission," which includes (a) noncitizens who present themselves at a port of entry without valid documents, and (b)

those who entered the country without inspection (EWI) and were thereafter apprehended – the law deems such individuals to be "arriving" or seeking admission even if physically inside the U.S. Section 1225(b) provides that if an immigration officer determines an arriving alien may not be clearly admissible, the alien "shall be detained" for removal proceedings under INA § 240. There is no provision for bond hearings under § 1225; release, if any, is only by parole at the discretion of the DHS (under INA § 212(d)(5)). By regulation, immigration judges *lack jurisdiction* to redetermine the custody of individuals detained under § 1225(b) as applicants for admission (arriving aliens) – such detainees cannot seek bond from the immigration court. This has long been the rule for people literally arriving at the border.

21. However, in a recent precedential decision, *Matter of Yajure Hurtado*, 29 I&N Dec. 216 (BIA 2025), the Board of Immigration Appeals dramatically expanded the scope of § 1225(b) custody. The BIA "proclaimed that any person who crossed the border unlawfully and is later taken into immigration detention is no longer eligible for release on bond." In other words, even noncitizens who entered without inspection years ago and were living in the U.S. are now classified as "applicants for admission" for custody purposes, rendering them ineligible for bond hearings just like arriving aliens at a port. The BIA reasoned that immigration judges have "no authority" to grant bond to such individuals, lest those who entered illegally end up with greater rights than those who presented at a port of entry. This decision reversed decades of prior practice and effectively ∫ for a broad class of undocumented immigrants in removal proceedings who previously would have been bond-eligible. Petitioner falls squarely within this category. Because he originally entered without a valid visa (albeit being paroled), and was taken

into ICE custody as an "arriving" alien, the Government's position is that *no immigration judge can grant him a bond hearing or release*. His only chance at release is DHS's grace via parole, a chance that is practically nonexistent under current ICE policies (parole has become "all but a dead letter").

22. The Fifth Amendment's Due Process Clause prohibits the Government from depriving an individual of liberty arbitrarily or indefinitely. Even when Congress has authorized detention in the immigration context, detention must remain reasonable in duration and reasonably related to the Government's purpose of effectuating removal. Due process demands basic procedural safeguards. A noncitizen *is entitled to a timely and meaningful opportunity to demonstrate that [he] should not be detained* in the first place. Prolonged detention without any hearing or review to determine if it is justified is precisely the kind of arbitrary and indefinite deprivation of liberty that the Constitution forbids.

23. Under the Constitution and applicable law, Petitioner's continued detention must be justified by compelling reasons and subject to meaningful review. If those safeguards are absent as they are in Petitioner's case, the detention is unlawful.

V. FACTUAL BACKGROUND

24. Petitioner Mukeshbhai Patel has resided in the United States for the majority of his life. He entered the U.S. in October 1992 by using a passport and visa under another identity due to urgent personal reasons (he feared for his safety in India). Immigration authorities at the port of entry identified the issue and paroled him into the United States pursuant to INA § 212(d)(5). Petitioner was thus treated as an "arriving alien" from the moment of entry. He settled in the United States and has lived here continuously for approximately

33 years, making his home and livelihood in this country. Petitioner has no criminal record whatsoever. He has been a law-abiding, productive member of his community. Over the years, he worked legally (obtaining employment authorization when possible through pending applications) and paid taxes on his earnings. *Please see* **Exhibit G**, Copy of Income Tax return and W-2. He has never hidden from immigration authorities; to the contrary, he has repeatedly attempted to legalize his status through the proper channels and has kept the government apprised of his address and activities. Petitioner's extensive community ties include close family in the United States. Most importantly, Petitioner's wife, Ishita Patel, is a U.S. citizen, and they have been married for 16 years.

25. On Petitioner's behalf, Ishita Patel filed an I-130 Petition for Alien Relative with USCIS to have him recognized as her immediate relative spouse. That petition was approved after an interview that Petitioner and his wife attended with USCIS. *Please see again* **Exhibit B**. Petitioner filed an I-485 Application to Adjust Status to Lawful Permanent Resident (green card application) in or around 2018. Because Petitioner had a potential inadmissibility ground stemming from his manner of entry (use of a fraudulent document), he concurrently filed a Form I-601 Application for Waiver of Inadmissibility under INA § 212(i). This waiver is to forgive the misrepresentation at entry, based on the extreme hardship that Petitioner's removal would cause to his U.S. citizen spouse. Both the petitions have been pending with USCIS for over seven years, languishing without a decision. *Please see again* **Exhibit C and D**. Petitioner and his wife have complied with every request from USCIS during this process.

26. Petitioner's U.S. citizen wife, Ishita Patel, is suffering from severe mental and physical health conditions. *Please see again* **Exhibit F**. Petitioner's sudden detention has already

had a devastating impact on Mrs. Patel's well-being. She is an individual with serious mental health vulnerabilities now left without her caregiver and husband. There is extensive evidence, documented in the waiver application, that Mrs. Patel will face extreme hardship if Petitioner remains detained or is removed. She has no other immediate family in the United States to care for her – no children, and her relatives are either not in the U.S. or incapable of providing the care she needs. Relocating to India to be with Petitioner (if he were removed) is not a viable option for Mrs. Patel: aside from her lack of support network there, the medical infrastructure and cultural attitudes toward mental illness in India would likely result in inadequate treatment for her, causing her condition to deteriorate rapidly.

VI. CLAIMS FOR RELIEF

COUNT ONE

SUBSTANTIVE DUE PROCESS VIOLATION

27. Petitioner realleges and incorporates by reference paragraphs 1 through 26 above as if fully set forth herein.

28. Petitioner's ongoing detention implicates his core liberty interest in freedom from bodily restraint. Freedom from physical detention lies at the heart of the liberty that the Due Process Clause protects. Civil detention is permissible only in narrow circumstances and only so long as it reasonably serves a legitimate government purpose. The government's interest in immigration detention is to ensure that a removable noncitizen is present for their proceedings and for removal if that outcome is ordered. Once detention ceases to serve that purpose in a reasonable way, continued detention becomes punitive, arbitrary, and constitutionally impermissible.

29. In Petitioner's case, there is no reasonable relation between his continued detention and the government's purposes. Petitioner is not a danger to public safety, as evidenced by his lack of criminal record and positive contributions. Petitioner is not a flight risk; he has every reason to continue seeking relief through the legal process (having a wife, home, and pending immigration applications here), and his history shows he complies with legal requirements and court processes. Thus, none of the traditional justifications for civil detention (preventing danger or flight) apply here. The only potential justification for detaining Petitioner would be to effectuate his removal – yet in reality, removal is not imminent or likely at this time. Petitioner's removal is stayed *de facto* by the pending motion to reopen and by the pending adjustment of status process.

30. Given the substantial merits of Petitioner's case (an approved visa petition and strong humanitarian factors), it is quite possible he will ultimately be allowed to adjust status and not be removed at all. In the interim, detaining Petitioner serves no active purpose except to punish him or coerce him into giving up his legal fight, which are impermissible motives for civil detention.

31. Petitioner's detention is indefinite. He is not even in active removal proceedings at the moment (his prior removal order is administratively final but subject to reopening). This is not a case where removal is scheduled or likely within a brief period; rather, ICE appears content to hold Petitioner for an open-ended duration while motions and applications remain pending.

32. Even if the government has a general interest in ensuring Petitioner's compliance with immigration proceedings, that interest can be served by far less restrictive means than incarceration. Petitioner is willing to comply with any conditions of release the Court or

ICE may impose, such as periodic c*heck-ins, travel restrictions, or even GPS monitoring if deemed necessary*. Given his strong community ties and desire to obtain lawful status, such conditions would amply mitigate any theoretical risk of flight. Continued detention is not narrowly tailored to serve any compelling government interest in this case. Rather, it inflicts punishment and hardship beyond what is permissible for civil detention.

COUNT TWO

PROCEDURAL DUE PROCESS VIOLATION

(DENIAL OF ANY BOND HEARING OR MEANINGFUL PROCESS)

33. Petitioner realleges and incorporates by reference paragraphs 1 through 26 above as if fully set forth herein.

34. Due Process Clause guarantees that a person deprived of liberty must be given a timely and meaningful opportunity to contest the basis for that deprivation. In the context of immigration detention, this means a detainee should have a chance to present evidence and arguments that he does not pose a flight risk or danger, and that continued detention is unwarranted. The specific procedures can vary, but at a minimum due process requires some kind of individualized custody hearing especially as detention becomes prolonged. Petitioner's procedural due process rights have been violated because he has not been afforded any hearing whatsoever, not at the outset of detention, and not thereafter to determine whether his confinement is justified. He was arrested and automatically kept in custody under a blanket policy, without any judge weighing the facts of his case in any adversarial or neutral forum.

35. In a typical case under INA § 1226(a), a detainee receives a bond hearing before an immigration judge shortly after being taken into ICE custody. Petitioner was

categorically denied this basic process because of his "arriving alien" status. The immigration court has never had an opportunity to review ICE's custody decision, and ICE's internal decision-making offered no substitute procedural safeguards. Essentially, Petitioner has been held on "automatic" mandatory detention with no mechanism to challenge his custody on the merits. This situation was compounded by the BIA's decision in *Matter of Yajure Hurtado*, which foreclosed any argument that an IJ could hear his bond request. Petitioner has thus been deprived of any hearing to determine the necessity of his detention, in violation of procedural due process.

36. The harm to Petitioner's procedural rights is ongoing and worsening as his detention lengthens. Even if one were to accept that no hearing is available at the moment of detaining an arriving alien, due process problems become more acute the longer a person is held. Courts have recognized that prolonged detention requires greater procedural protections, such as a bond hearing, to ensure that detention remains justified. Here, Petitioner's detention has stretched on, yet no automatic review or hearing has occurred at any stage. There is no statutory or regulatory provision for an administrative custody review for arriving aliens like Petitioner (unlike some provisions for 90-day or 180-day reviews in other contexts), Petitioner's inability to challenge his detention before a neutral decision-maker violates the most basic tenets of procedural due process.

37. In procedural due process analysis, the Court considers (1) the private interest at stake, (2) the risk of erroneous deprivation under current procedures and the value of additional safeguards, and (3) the government's interest. *Please see Mathews v. Eldridge*, 424 U.S. 319 (1976). Here, Petitioner's private interest in freedom is fundamental and weighty – he is enduring incarceration and separation from his family. The risk of erroneous

deprivation is extraordinarily high when no hearing is provided: ICE's unilateral decision might be premised on an erroneous assumption (for example, misjudging Petitioner as a flight risk when he is not). The value of additional safeguards, such as a prompt bond hearing, is immense, as it would allow an independent evaluation of Petitioner's suitability for release, potentially correcting any mistake. On the other side, the government's interest in avoiding bond hearings for arriving aliens is minimal, beyond a general desire for administrative efficiency. The government can still ensure removal by setting appropriate conditions of release if needed. Providing Petitioner a bond hearing would not unduly burden the government, but failing to provide one gravely increases the risk of an erroneous and unconstitutional detention. Thus, the balance of factors strongly favors that due process required giving Petitioner a bond hearing.

VII. PRAYER FOR RELIEF

WHEREFORE, Petitioner respectfully requests that this Court grant the following relief:

1. Assume Jurisdiction over this matter;
2. Grant Petitioner a writ of habeas corpus directing Respondents to immediately release Petitioner from custody;
3. Enter preliminary and permanent injunctive relief enjoining Respondents from further unlawful detention of Petitioner;
4. Grant any other and further relief that this Court deems just and proper.

Respectfully submitted on September 5, 2025.

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CERTIFICATE OF SERVICE

I, Bhavya Chaudhary, Esq. hereby certify that a copy of the foregoing was mailed First class postage prepaid to the office of the Attorney General at the below mentioned address:

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