

A state law that restricted access to contraception was challenged in state court as a violation of the due process clause of the Fourteenth Amendment to the U.S. Constitution and as a violation of a similar due process provision of the state constitution. The case made its way to the state's highest court, which ruled that the law violated the due process provisions of both the U.S. and the state constitutions.

If petitioned to do so, may the U.S. Supreme Court exercise jurisdiction to review the state court decision?

- A. No, because the state court's decision in this case rests on adequate and independent state law grounds.
- B. No, because the U.S. Supreme Court has appellate jurisdiction only over state court decisions that determine the constitutionality of federal laws.
- C. Yes, because the U.S. Supreme Court has appellate jurisdiction over any ruling of a state's highest court based on an interpretation of federal law.
- D. Yes, because the U.S. Supreme Court has appellate jurisdiction over decisions that find state laws in violation of the federal Constitution.

## Explanation:

### Appellate jurisdiction of SCOTUS

Type of review	Applicability
<b>Certiorari</b> (discretionary review)	<ul style="list-style-type: none"><li>• Appeal from lower federal court or highest state court by filing petition for writ of certiorari</li><li>• SCOTUS will review if <math>\geq 4</math> Justices vote to accept appeal</li><li>• Very common – how most cases come before SCOTUS</li></ul>
<b>Direct appeal</b> (mandatory review)	<ul style="list-style-type: none"><li>• Appeal from decision on injunction by special three-judge federal district court panel</li><li>• Extremely rare – limited to cases brought under specific statutes (eg, Voting Rights Act)</li></ul>

**SCOTUS** = Supreme Court of the United States

The **U.S. Supreme Court** (SCOTUS) has discretionary jurisdiction to review final **state court decisions** that involve federal law. But SCOTUS **cannot exercise jurisdiction** to review those decisions if they rest on **adequate and independent state grounds**—ie, when:

- **state law completely resolves** the matter such that the application of federal law would not affect the outcome of the case (adequate) *and*
- the state court did **not rely on federal law** to decide the state law issue (independent).

This limit on SCOTUS's jurisdiction promotes judicial economy by barring SCOTUS from deciding a federal question when it would not change the outcome of the case.

Here, the highest state court's ruling rests on an *adequate* state ground because the court found the law invalid under the state constitution. So even if SCOTUS reversed the state court's ruling on the U.S. Constitution, the law would still violate the state constitution and the outcome of the case would remain the same. The ruling also rests on an *independent* state ground because the state court did not rely on federal law in ruling on the similar state constitutional issue.\* As a result, SCOTUS may *not* exercise jurisdiction to review the state court decision.

\*A state court ruling is not independent if the state court relied on an "identical" federal provision to rule on the state provision. Here, the federal and state due process provisions are similar but not the same, so the ruling rests on an independent state ground.

**(Choice B)** SCOTUS has appellate jurisdiction over state court decisions determining the constitutionality of federal laws AND the validity of state laws under the U.S. Constitution.

**(Choices C & D)** SCOTUS has appellate jurisdiction over state court decisions based on federal law—including decisions that find state laws in violation of the federal constitution—*unless* that decision rests on adequate and independent state grounds.

**Educational objective:**

The U.S. Supreme Court has no jurisdiction to review state court decisions based on adequate and independent state grounds—ie, when state grounds completely resolve the matter and the court does not rely on federal law to reach that decision.

**References**

- Michigan v. Long, 463 U.S. 1032, 1041 (1983) (explaining when a state supreme court judgment rests on adequate and independent state grounds).

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