

SUPREME COURT OF FLORIDA

David Joseph Pittman v. State of Florida

No. SC2025-1320 (Fla. Sept. 10, 2025) · No. SC2025-1320 · Decided September 11, 2025

SUMMARY

The Florida Supreme Court affirmed the summary denial of David Joseph Pittman’s fourth successive motion for postconviction relief and denied his motion to stay execution. The court held that his intellectual disability claim was untimely and procedurally barred under controlling Florida precedent, and rejected his due process and Eighth Amendment arguments. Justice Labarga dissented, maintaining his disagreement with the court’s retroactivity ruling concerning intellectual disability claims.

CASE DETAILS

COURT	Supreme Court of Florida
WRITING FOR THE COURT	Per Curiam; Carlos G. Muñoz, Chief Justice; Rene H. Couriel, Justice; Robert J. Luck, Justice; John D. Couriel, Justice; Meredith L. Sasso, Justice
JURISDICTION	Supreme Court of Florida
DECIDED	September 11, 2025
DOCKET	SC2025-1320
DISPOSITION	affirmed
PROCEDURAL POSTURE	Pittman appealed the circuit court's summary denial of his fourth successive motion for postconviction relief under Florida Rule of Criminal Procedure 3.851 and his motion for a stay of execution under section 922.07(1), Florida Statutes.
STANDARD OF REVIEW	Summary denial is proper when the motion, files, and records conclusively show that the movant is entitled to no relief. The court accepts allegations as true unless conclusively refuted by the record, but the defendant must establish a prima facie case based on a legally valid claim. Whether to grant an evidentiary hearing on a Rule 3.851 motion is reviewed de novo as a pure question of law.
PRECEDENTIAL VALUE	published
PARTIES	David Joseph Pittman v. State of Florida

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QUESTIONS PRESENTED

1. Whether Pittman's fourth successive intellectual-disability claim was procedurally barred and untimely under Florida's capital postconviction rules.
2. Whether Pittman was entitled to an evidentiary hearing on his intellectual-disability claim.
3. Whether the denial of further proceedings violated due process or rendered the death penalty arbitrary and capricious under the Eighth Amendment.
4. Whether Pittman was entitled to a stay of execution.

HOLDINGS

1. Summary denial was proper because the motion, files, and records established that Pittman was not entitled to relief.
2. The intellectual-disability claim was untimely because Pittman was required to raise it no later than 60 days after October 1, 2004.
3. The claim was procedurally barred because Pittman had previously raised his intellectual-disability claim.
4. Due process did not require an additional hearing because Pittman had received the process due and failed to satisfy the standards for avoiding summary denial.
5. Adhering to Phillips did not result in an arbitrary or capricious application of the death penalty, and Florida's death-penalty scheme remained constitutionally sound.
6. Pittman was not entitled to a stay of execution because he had not shown substantial grounds upon which postconviction relief might be granted.

KEY QUOTATIONS

“Summary denial of a successive postconviction motion is appropriate ‘[i]f the motion, files, and records in the case conclusively show that the movant is entitled to no relief.’” (7)

“The defendant bears the burden to establish a prima facie case based on a legally valid claim; mere conclusory allegations are insufficient.” (8)

“Claims raised and rejected in prior postconviction proceedings are procedurally barred from being relitigated in a successive motion.” (9)

“Due process requires that a defendant be given notice and an opportunity to be heard on a matter before it is decided.” (10)

“A stay of execution on a successive motion for postconviction relief is warranted only where there are substantial grounds upon which relief might be granted.” (12)

FACTUAL BACKGROUND

Pittman was sentenced to death for murdering three members of his former wife's family in 1990 after cutting the telephone lines, entering the home, and attacking the victims. He later burned the home and yard and stole a vehicle. After multiple unsuccessful direct and postconviction challenges, including prior litigation concerning intellectual disability, Pittman filed a fourth successive motion after a death warrant was issued, arguing that he was entitled to an evidentiary hearing to establish that his execution was constitutionally prohibited because of intellectual disability.

PROCEDURAL HISTORY

Pittman was convicted of three counts of first-degree murder and sentenced to death after the 1990 killings of his former wife's family members. The Florida Supreme Court affirmed on direct appeal, and Pittman subsequently pursued state and federal postconviction proceedings, including prior intellectual-disability claims. After Governor DeSantis signed a death warrant, Pittman filed the successive motion at issue, which the circuit court summarily denied. The Florida Supreme Court affirmed and denied a stay of execution.

DISPOSITION

affirmed

CASES CITED

- Pittman v. State, 646 So. 2d 167 (Fla. 1994)
- Pittman v. Florida, 514 U.S. 1119 (1995)
- Pittman v. State, 90 So. 3d 794 (Fla. 2011)
- Pittman v. Sec'y, Dep't of Corr., No. 8:12-cv-1600-T-17EAJ, 2015 WL 736417 (M.D. Fla. Feb. 20, 2015)
- Pittman v. Sec'y, Fla. Dep't of Corr., 871 F.3d 1231 (11th Cir. 2017)
- Pittman v. Jones, 586 U.S. 839 (2018)
- Pittman v. State, 337 So. 3d 776 (Fla. 2022)
- Bogle v. State, 322 So. 3d 44 (Fla. 2021)
- Tompkins v. State, 994 So. 2d 1072 (Fla. 2008)
- Rolling v. State, 944 So. 2d 176 (Fla. 2006)
- Franqui v. State, 59 So. 3d 82 (Fla. 2011)
- Freeman v. State, 761 So. 2d 1055 (Fla. 2000)
- Marek v. State, 8 So. 3d 1123 (Fla. 2009)
- State v. Coney, 845 So. 2d 120 (Fla. 2003)

- Hall v. Florida, Hall v. Florida, 572 U.S. 701 (2014)
- Walls v. State, 213 So. 3d 340 (Fla. 2016)
- Phillips v. State, 299 So. 3d 1013 (Fla. 2020)
- Foster v. State, 395 So. 3d 127 (Fla. 2024)
- Walls v. State, 361 So. 3d 231 (Fla. 2023)
- Hendrix v. State, 136 So. 3d 1122 (Fla. 2014)
- Van Poyck v. State, 116 So. 3d 347 (Fla. 2013)
- Dillbeck v. State, 357 So. 3d 94 (Fla. 2023)
- Barwick v. State, 361 So. 3d 785 (Fla. 2023)
- Carroll v. State, 114 So. 3d 883 (Fla. 2013)
- In re Bowles, 935 F.3d 1210 (11th Cir. 2019)
- Asay v. State, 210 So. 3d 1 (Fla. 2016)
- Huff v. State, 622 So. 2d 982 (Fla. 1993)
- Bates v. State, No. SC2025-1127, 50 Fla. L. Weekly S223, 2025 WL 2319001 (Fla. Aug. 12, 2025)
- Miller v. State, 379 So. 3d 1109 (Fla. 2023)
- Lawrence v. State, 308 So. 3d 544 (Fla. 2020)
- Bush v. State, 295 So. 3d 179 (Fla. 2020)
- Davis v. State, 142 So. 3d 867 (Fla. 2014)

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