

ARKANSAS COURT OF APPEALS, DIVISION IV

Jimmy Standridge v. State of Arkansas

Standridge, 2025 Ark. App. 608 (Ark. Ct. App. 2025) · No. CR-24-811 · Decided December 10, 2025

SUMMARY

The Arkansas Court of Appeals affirmed the dismissal of Jimmy Standridge’s pro se amended petition for postconviction relief under Arkansas Rule of Criminal Procedure 37.1. The court held that the circuit court acted within its discretion in dismissing the petition because it exceeded the ten-page limit, including exhibits, and did not comply with the rule’s formatting requirements.

CASE DETAILS

COURT	Arkansas Court of Appeals, Division IV
WRITING FOR THE COURT	Mike Murphy; Abramson; Thyer
JURISDICTION	Arkansas Court of Appeals, Division IV
DECIDED	December 10, 2025
DOCKET	CR-24-811
DISPOSITION	affirmed
PROCEDURAL POSTURE	Appeal from the dismissal of a pro se amended petition for postconviction relief under Arkansas Rule of Criminal Procedure 37.1.
STANDARD OF REVIEW	A circuit court's dismissal of an overlength postconviction petition is reviewed for abuse of discretion.
PRECEDENTIAL VALUE	Published opinion
PARTIES	Jimmy Standridge v. State of Arkansas

TOPICS

- state post-conviction relief
- post-conviction relief
- appellate procedure
- criminal procedure
- standard of review

PRACTICE AREAS

- post-conviction relief
- criminal procedure
- appellate procedure

QUESTIONS PRESENTED

1. Whether the circuit court abused its discretion by dismissing Standridge's amended Rule 37.1 petition because it exceeded the ten-page limit and failed to comply with the rule's margin requirements.
2. Whether the circuit court was required to consider the merits of a noncompliant amended postconviction petition.

HOLDINGS

1. Rule 37.1(b)'s ten-page limit is a reasonable procedural restriction, and the circuit court may dismiss a petition that exceeds the limit or otherwise fails to comply with the rule.
2. The circuit court was not required to consider the merits and acted within its discretion by dismissing Standridge's noncompliant amended petition.

KEY QUOTATIONS

“Rule 37.1(b) provides that a petition for postconviction relief “shall not exceed ten pages” and authorizes the circuit court to “dismiss any petition that fails to comply with this subsection.”” (at 2)

“Because there is no constitutional right to postconviction review, due process requires only that the proceeding be fundamentally fair, and reasonable page limits satisfy that standard.” (at 3)

FACTUAL BACKGROUND

Standridge was convicted in 2022 of four counts of rape and six counts of second-degree sexual assault and sentenced to a total of 220 years' imprisonment. Following affirmance of his convictions on direct appeal, he filed a Rule 37.1 postconviction petition and obtained extensions to file an amended petition. His pro se amended petition was fourteen pages long and included more than eighty pages of exhibits, exceeding the ten-page limit and violating the rule's formatting requirements.

PROCEDURAL HISTORY

Standridge was convicted by a Miller County jury of four counts of rape and six counts of second-degree sexual assault and received an aggregate 220-year sentence. The Arkansas Court of Appeals affirmed his convictions on direct appeal. After the circuit court extended the deadline for filing an amended Rule 37.1 petition, Standridge's counsel withdrew and Standridge filed a fourteen-page pro se amended petition with more than eighty pages of exhibits. The circuit court dismissed the petition as overlength and noncompliant with Rule 37.1(b), and the Court of Appeals affirmed.

DISPOSITION

affirmed

CASES CITED

- Standridge v. State, 2023 Ark. App. 141, 662 S.W.3d 255
- Davis v. State, 2010 Ark. 366
- Sanders v. State, 352 Ark. 16, 98 S.W.3d 35 (2003)

- *Maulding v. State*, 299 Ark. 570, 776 S.W.2d 339 (1989)
- *Washington v. State*, 308 Ark. 322, 823 S.W.2d 900 (1992)
- *Fields v. State*, 2020 Ark. App. 213, 599 S.W.3d 351
- *Smith v. State*, 2015 Ark. 23, 454 S.W.3d 219 (per curiam)
- *Murphy v. State*, 2022 Ark. App. 109

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