

OREGON COURT OF APPEALS

State v. Farnham

350 Or. App. 228 (2026) · No. A187134 · Decided June 3, 2026

SUMMARY

The Oregon Court of Appeals dismissed as moot Michael Daniel Farnham’s appeal concerning the length of a driver’s license suspension imposed after his convictions for felony fleeing or attempting to elude, misdemeanor unlawful possession of methamphetamine, and misdemeanor driving while suspended or revoked. The court also declined to exercise discretionary review of the moot issue because the same argument had previously been rejected in State v. Farnham, 341 Or App 787 (2025).

CASE DETAILS

COURT	Oregon Court of Appeals
WRITING FOR THE COURT	Egan, J.; Lagesen, Chief Judge; Egan, Judge
JURISDICTION	Oregon Court of Appeals
DECIDED	June 3, 2026
DOCKET	A187134
DISPOSITION	dismissed
PROCEDURAL POSTURE	Defendant appealed a judgment of conviction and the resulting one-year revocation of his driving privileges, arguing that the trial court should have imposed only a 90-day suspension. The Oregon Court of Appeals dismissed the appeal as moot.
PRECEDENTIAL VALUE	Published Oregon Court of Appeals opinion
PARTIES	Michael Daniel Farnham v. State of Oregon

TOPICS

- mootness
- appellate procedure
- criminal procedure
- statutory interpretation

PRACTICE AREAS

- Criminal appellate procedure
- Driver's-license revocation
- Statutory interpretation

QUESTIONS PRESENTED

1. Whether the appeal challenging the duration of defendant's driver's-license revocation was moot after the one-year revocation period expired.
2. Whether the court should exercise its discretion under ORS 14.175 to review the otherwise moot issue even though the same legal issue had already been resolved in *State v. Farnham*.

HOLDINGS

1. The appeal was moot because more than one year had elapsed since defendant's driver's license was revoked.
2. Even assuming the statutory prerequisites for review of a moot issue were satisfied, the court declined to exercise its discretion because the same legal issue had already been resolved in *State v. Farnham*.

KEY QUOTATIONS

“Consequently, we dismiss this appeal as moot.” (229)

FACTUAL BACKGROUND

Defendant was convicted of felony fleeing or attempting to elude a police officer, misdemeanor unlawful possession of methamphetamine, and misdemeanor driving while suspended or revoked. The conviction for fleeing or attempting to elude resulted in a one-year revocation of defendant's driving privileges. Defendant challenged the duration of the revocation, contending that ORS 809.411 required only a 90-day suspension, but the revocation period had expired by the time the appellate court considered the appeal.

PROCEDURAL HISTORY

The Coos County Circuit Court entered convictions for felony fleeing or attempting to elude a police officer, misdemeanor unlawful possession of methamphetamine, and misdemeanor driving while suspended or revoked. Based on the fleeing conviction, the circuit court revoked defendant's driving privileges for one year. Defendant appealed, but by the time of appellate review the one-year revocation had expired. The court dismissed the appeal as moot and declined to exercise discretionary review under ORS 14.175.

DISPOSITION

dismissed

CASES CITED

- *State v. Farnham*, 341 Or. App. 787, 575 P.3d 196, rev. denied, 374 Or. 593 (2025)
- *Bloomgarden v. Betschart*, 313 Or. App. 804, 807-08, 498 P.3d 338 (2021), rev. denied, 369 Or. 504 (2022)