

SUPREME COURT OF IOWA

Norman Wayne Davis IV v. State of Iowa

Davis · No. 25-0157 · Decided May 8, 2026

SUMMARY

The Iowa Supreme Court affirmed the dismissal of Norman Wayne Davis IV’s postconviction-relief application as untimely. The court declined to adopt a judicial prison-mailbox rule, holding that under Iowa statutes and procedural rules an application is filed when received by the clerk of court, not when delivered to prison officials for mailing. The court concluded that adopting such a rule is a matter for the legislature.

CASE DETAILS

COURT	Supreme Court of Iowa
WRITING FOR THE COURT	McDermott, J.
JURISDICTION	Iowa Supreme Court
DECIDED	May 8, 2026
DOCKET	25-0157
DISPOSITION	affirmed
PROCEDURAL POSTURE	Davis appealed the Iowa District Court for Polk County's dismissal of his application for postconviction relief as untimely under Iowa Code section 822.3. He asked the Supreme Court of Iowa to adopt the prison-mailbox rule and deem his application filed when he delivered it to prison officials for mailing.
STANDARD OF REVIEW	The court interpreted Iowa statutes and court rules de novo and reviewed the timeliness issue under the governing filing requirements.
PRECEDENTIAL VALUE	Published Iowa Supreme Court opinion
PARTIES	Norman Wayne Davis IV v. State of Iowa

TOPICS

- post-conviction relief
- statute of limitations
- statutory interpretation
- plain meaning rule
- appellate procedure

PRACTICE AREAS

- post-conviction relief
- statutory interpretation
- civil procedure
- appellate procedure

QUESTIONS PRESENTED

1. Whether Iowa should adopt the prison-mailbox rule for postconviction-relief applications so that an inmate's application is deemed filed when delivered to prison officials for mailing.
2. Whether Davis's application was timely under Iowa Code section 822.3 and the Iowa filing statutes and rules.

HOLDINGS

1. Iowa does not recognize a prison-mailbox rule for postconviction-relief applications under the statutes and rules presently in effect. An application is filed only when received and filed by the clerk of the district court, not when delivered to a prison official for mailing.
2. Davis's application was untimely because it was not filed with the clerk of court by September 27, 2024, the end of the three-year limitations period.

KEY QUOTATIONS

“Whatever the mode of filing, our rules define a document as “filed” only when it has been received.” (7-8)

“The decision to adopt a prison-mailbox rule for postconviction-relief applications is one for the legislature.” (8)

“There’s little question, in our view, that the law as it stands requires that for an application to be filed, it must be filed with the clerk of court and not simply provided to a prison official.” (8)

FACTUAL BACKGROUND

Davis's conviction became final on September 27, 2021, making September 27, 2024, the deadline for filing his postconviction-relief application under Iowa Code section 822.3. He claimed he handed the application to a correctional officer for mailing on September 22, 2024; the envelope was postmarked September 25, but the district-court clerk did not file it until October 4. Because the application was received and filed by the clerk after the statutory deadline, the district court dismissed it as untimely.

PROCEDURAL HISTORY

Davis pleaded guilty to five crimes and was sentenced on September 27, 2021; the sentence was initially suspended and he was placed on probation. After he violated probation, the district court ordered him to serve the sentence on June 27, 2024. Davis submitted his postconviction-relief application to prison officials on September 22, 2024, but the clerk filed it on October 4, 2024, after the three-year deadline. The district court rejected the prison-mailbox argument and dismissed the application, and the Supreme Court of Iowa affirmed.

DISPOSITION

affirmed

CASES CITED

- Overton v. State, 493 N.W.2d 857, 858 (Iowa 1992)
- Houston v. Lack, 487 U.S. 266 (1988)
- Haag v. State, 591 So. 2d 614, 617 (Fla. 1992)
- Dowell v. State, 922 N.E.2d 605, 606 (Ind. 2010)
- Sykes v. State, 757 So. 2d 997, 1000-01 (Miss. 2000) (en banc)
- Smith v. Pa. Bd. of Prob. & Parole, 683 A.2d 278, 281 (Pa. 1996)
- Carr v. State, 554 A.2d 778, 779-80 (Del. 1989) (per curiam)
- Martin v. Dep't of Corr., 190 A.3d 237, 240-42 (Me. 2018)
- Chang v. State, 778 N.W.2d 388, 390-92 (Minn. Ct. App. 2010)
- State v. Parmar, 586 N.W.2d 279, 283-84 (Neb. 1998)
- Grant v. Senkowski, 744 N.E.2d 132, 134 (N.Y. 2001)
- Howard v. Webber, 512 S.W.3d 624, 625-26 (Ark. 2017) (per curiam)
- People v. Smith, 19 N.W.3d 335, 335 (Mich. 2025)
- Sandoval v. State, 975 N.W.2d 434, 437 (Iowa 2022)
- Bedford v. Bd. of Sup'rs, 144 N.W. 301, 303 (Iowa 1913)
- Peterson v. Barnett, 239 N.W. 77, 78 (Iowa 1931)
- Mills v. Bd. of Sup'rs, 290 N.W. 50, 51 (Iowa 1940)
- State v. Ross, 941 N.W.2d 341, 346 (Iowa 2020)
- Brakke v. Iowa Dep't of Nat. Res., 897 N.W.2d 522, 541 (Iowa 2017)

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