

SUPREME COURT OF MINNESOTA

Robert Marlyn Taylor v. State of Minnesota

874 N.W.2d 429 (Minn. 2016) · No. A15-0398 · Decided February 3, 2016

SUMMARY

The Minnesota Supreme Court affirmed the summary denial of Robert Marlyn Taylor’s second petition for postconviction relief. The court held that the petition was untimely under Minnesota’s two-year postconviction statute of limitations and that Taylor’s pro se status and limited legal knowledge did not satisfy the interests-of-justice exception.

CASE DETAILS

COURT	Supreme Court of Minnesota
WRITING FOR THE COURT	Stras, J.
JURISDICTION	Minnesota
DECIDED	February 3, 2016
DOCKET	A15-0398
DISPOSITION	affirmed
PROCEDURAL POSTURE	Taylor appealed the summary denial, without an evidentiary hearing, of his second petition for postconviction relief.
STANDARD OF REVIEW	The denial of a postconviction petition and the denial of a request for an evidentiary hearing are reviewed for abuse of discretion; underlying factual findings are reviewed for clear error and legal conclusions de novo.
PRECEDENTIAL VALUE	precedential
PARTIES	Robert Marlyn Taylor v. State of Minnesota

TOPICS

state post-conviction relief successive petitions post-conviction relief appellate procedure
standard of review

PRACTICE AREAS

Minnesota postconviction relief criminal procedure appellate procedure

QUESTIONS PRESENTED

1. Whether the postconviction court abused its discretion by summarily denying Taylor's second petition for postconviction relief without an evidentiary hearing.
2. Whether Taylor's second petition was timely under Minn. Stat. § 590.01, subd. 4(a)(2).
3. Whether Taylor satisfied the interests-of-justice exception to the postconviction statute of limitations under Minn. Stat. § 590.01, subd. 4(b)(5).

HOLDINGS

1. Taylor's second petition was untimely because his conviction became final before the postconviction statute of limitations took effect, making August 1, 2007, the applicable filing deadline, and he did not file until October 30, 2014.
2. Taylor did not satisfy the interests-of-justice exception to the postconviction statute of limitations because his pro se status and limited understanding of the legal system did not constitute an exceptional circumstance warranting review of his untimely petition.
3. The postconviction court did not abuse its discretion by summarily denying the petition without an evidentiary hearing because the petition, files, and records conclusively established that Taylor was not entitled to relief.

KEY QUOTATIONS

“A postconviction court may deny a petition for postconviction relief without holding an evidentiary hearing if the petition, files, and records in the proceeding conclusively establish that the petitioner is not entitled to relief.” (at 431)

“This exception, which is “reserved for exceptional cases,”” (at 433)

FACTUAL BACKGROUND

Taylor was convicted in 2001 of first-degree premeditated murder for the 1999 killing of John Turner. The Minnesota Supreme Court affirmed the conviction on direct appeal in 2002. Taylor later filed a second postconviction petition based in part on the removal of trial judge Harvey Ginsberg from office, but waited until October 30, 2014, to file it.

PROCEDURAL HISTORY

Taylor was convicted of first-degree premeditated murder after a second jury trial, and the Minnesota Supreme Court affirmed his conviction on direct appeal in 2002. The postconviction court denied his first petition in 2003, and the Minnesota Supreme Court affirmed in 2005. Taylor filed his second postconviction petition on October 30, 2014, asserting claims concerning the trial judge, ineffective assistance of counsel, evidentiary error, and prosecutorial misconduct. The postconviction court summarily denied the petition as untimely and procedurally barred, and the Minnesota Supreme Court affirmed.

DISPOSITION

affirmed

CASES CITED

- State v. Taylor, 650 N.W.2d 190, 208 (Minn. 2002)
- In re Conduct of Ginsberg, 690 N.W.2d 539, 542 (Minn. 2004)
- In re Conduct of Ginsberg, 690 N.W.2d 539, 551-52 (Minn. 2004)
- Taylor v. State, 691 N.W.2d 78 (Minn. 2005)
- Riley v. State, 819 N.W.2d 162, 167-70 (Minn. 2012)
- Williams v. State, 869 N.W.2d 316, 318 (Minn. 2015)
- Caldwell v. State, 853 N.W.2d 766, 770 (Minn. 2014)
- State v. Knaffla, 309 Minn. 246, 243 N.W.2d 737 (1976)
- Buckingham v. State, 799 N.W.2d 229, 233-34 (Minn. 2011)
- Wayne v. State, 870 N.W.2d 389, 392 (Minn. 2015)
- Wayne v. State, 866 N.W.2d 917, 920 (Minn. 2015)
- Berkovitz v. State, 826 N.W.2d 203, 207 (Minn. 2013)