

SUPREME COURT OF THE UNITED STATES

Clark v. Sweeney

607 U.S. 7 (2025) · No. No. 25-52 · Decided November 24, 2025

SUMMARY

The Supreme Court held that the Fourth Circuit violated the party-presentation principle by granting habeas relief on a claim that the petitioner had not asserted and the State had not addressed. The Court reversed and remanded for the Fourth Circuit to consider the petitioner’s actual ineffective-assistance-of-counsel claim under the deferential standards governing federal habeas review.

CASE DETAILS

COURT	Supreme Court of the United States
JURISDICTION	Supreme Court of the United States
DECIDED	November 24, 2025
DOCKET	No. 25-52
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	The Supreme Court granted certiorari to review the Fourth Circuit's reversal of the denial of Sweeney's federal habeas petition and its order granting a new trial.
STANDARD OF REVIEW	Under the Antiterrorism and Effective Death Penalty Act, federal habeas relief is unavailable unless the state-court decision was contrary to, or involved an unreasonable application of, clearly established Supreme Court precedent. Review of a state-court-adjudicated Strickland claim is doubly deferential; relief is available only if every fairminded jurist would agree that the state court's decision was wrong.
PRECEDENTIAL VALUE	binding
PARTIES	Clark v. Sweeney

TOPICS

- federal habeas corpus
- ineffective assistance
- appellate procedure
- post-conviction relief
- standard of review

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the Fourth Circuit violated the party-presentation principle and abused its discretion by granting habeas relief on a claim that Sweeney had not asserted and that the State had not had an opportunity to address.
2. What standard the Fourth Circuit must apply on remand to Sweeney's asserted ineffective-assistance-of-counsel claim under 28 U.S.C. § 2254(d) and Strickland.

HOLDINGS

1. The Fourth Circuit abused its discretion by transforming Sweeney's ineffective-assistance claim into a different claim concerning a combination of failures by the juror, judge, and attorney, because the new claim was neither asserted by Sweeney nor addressed by the State.
2. The Fourth Circuit must analyze the ineffective-assistance claim Sweeney actually asserted under AEDPA's deferential standard and the doubly deferential standard applicable to a state-court-adjudicated Strickland claim.

KEY QUOTATIONS

“*“In our adversarial system of adjudication, we follow the principle of party presentation.”*” (607 U.S. at 9)

“*The Fourth Circuit's “radical transformation” of Sweeney's simple ineffective-assistance claim “departed so drastically from the principle of party presentation as to constitute an abuse of discretion.”*” (607 U.S. at 10)

FACTUAL BACKGROUND

After arguing with neighbors about stolen marijuana, Jeremiah Sweeney fired a gun, missing his intended targets but killing a bystander approximately 75 yards away. During the trial, Juror 4 independently visited the crime scene and reported the visit to the jury after deliberations began. The trial court dismissed Juror 4 and allowed deliberations to continue with 11 jurors, after which Sweeney was convicted.

PROCEDURAL HISTORY

A Maryland jury convicted Jeremiah Sweeney of second-degree murder and other crimes. His convictions were affirmed on direct appeal, and the Maryland state courts denied postconviction relief after a hearing on his ineffective-assistance claim. The federal District Court denied relief under 28 U.S.C. § 2254, but the Fourth Circuit reversed in an unpublished opinion and ordered a new trial based on a claim Sweeney had not asserted. The Supreme Court reversed and remanded for the Fourth Circuit to consider the ineffective-assistance claim actually presented.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The Fourth Circuit must analyze the ineffective-assistance claim Sweeney actually asserted, applying the AEDPA standard in 28 U.S.C. § 2254(d) and the doubly deferential standard applicable to state-court-adjudicated Strickland claims.

CASES CITED

- Strickland v. Washington, 466 U.S. 668, 686 (1984)
- United States v. Sineneng-Smith, 590 U.S. 371, 375, 380 (2020)
- Greenlaw v. United States, 554 U.S. 237, 243 (2008)
- Lomax v. Ortiz-Marquez, 590 U.S. 595, 599 (2020)
- Dunn v. Reeves, 594 U.S. 731, 739-740 (2021) (per curiam)
- Burt v. Titlow, 571 U.S. 12, 15 (2013)
- Harrington v. Richter, 562 U.S. 86, 101 (2011)

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