

SUPREME COURT OF PENNSYLVANIA

Commonwealth v. Speight

Speight · No. 778 CAP · Decided April 29, 2021

SUMMARY

Justice Mundy concurs in the result, agreeing that the Pennsylvania Supreme Court had jurisdiction and that the Philadelphia Court of Common Pleas erred by failing to resentence Melvin Speight after his death sentence was vacated by a federal district court. The concurrence questions whether the federal court independently reviewed the habeas claims as required by 28 U.S.C. § 2254, rather than granting relief solely based on the parties' agreement. It nevertheless concludes that the trial court's role on remand was limited to resentencing.

CASE DETAILS

COURT	Supreme Court of Pennsylvania
WRITING FOR THE COURT	Justice Mundy
JURISDICTION	Pennsylvania
DECIDED	April 29, 2021
DOCKET	778 CAP
DISPOSITION	other
PROCEDURAL POSTURE	Appeal from the Philadelphia County Court of Common Pleas order declining to resentence Appellant after a federal district court granted habeas relief as to his death sentence and remanded the case for resentencing.
PRECEDENTIAL VALUE	Published concurring opinion; the concurrence agrees with the majority's jurisdictional and resentencing conclusions but separately questions the federal district court's independent habeas review.
PARTIES	Melvin Speight v. Commonwealth of Pennsylvania

TOPICS

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QUESTIONS PRESENTED

1. Whether the Pennsylvania Supreme Court had jurisdiction to review the trial court's order.
2. Whether the Court of Common Pleas erred by failing to resentence Speight after the federal district court vacated his death sentence and directed resentencing.
3. Whether a federal habeas court may grant relief solely upon the parties' agreement without independently reviewing the federal legal questions presented.

HOLDINGS

1. The trial court erred by treating the issue as whether it had authority to vacate Speight's death sentence; the federal district court had already vacated that sentence and directed resentencing, so the trial court's authority was limited to resentencing Speight.
2. A federal habeas court must independently review the legal questions raised under 28 U.S.C. § 2254 and may not grant habeas relief solely because the parties agree to it.

KEY QUOTATIONS

“Stated differently, a federal court may not grant an application for a writ of habeas corpus based solely upon agreement of the parties.” (at 2)

“Therefore, regardless of whatever qualms the trial court may have had with the District Court’s memorandum opinion and order, the trial court’s authority was limited to resentencing Appellant.” (at 4)

FACTUAL BACKGROUND

Melvin Speight was subject to a death sentence in a Pennsylvania criminal case. In federal habeas proceedings, the Commonwealth did not contest relief concerning the death sentence, and the federal district court granted the petition in part and remanded the case to Pennsylvania for resentencing. On remand, the Philadelphia County Court of Common Pleas questioned its authority to vacate the death sentence rather than simply resentence Speight.

PROCEDURAL HISTORY

The United States District Court for the Eastern District of Pennsylvania granted habeas relief concerning Appellant's death sentence and remanded the case to Pennsylvania for resentencing. The Philadelphia County Court of Common Pleas subsequently examined whether it had authority to vacate the death sentence and did not resentence Appellant. The Pennsylvania Supreme Court reviewed that order and, in this concurring opinion, agreed with the majority that the trial court erred by failing to resentence Appellant.

DISPOSITION

other

REMAND INSTRUCTIONS

The Court of Common Pleas was required to resentence Speight because the federal district court had already vacated the death sentence and directed resentencing.

CASES CITED

- Lockyer v. Andrade, 538 U.S. 63, 75-76 (2003)
- Williams v. Taylor, 529 U.S. 362, 411 (2000)
- Wharton v. Vaughn, 371 F. Supp. 3d 195, 199-200 (E.D. Pa. 2019)
- Johnson v. McCaughtry, 265 F.3d 559, 564 (7th Cir. 2001)
- Every v. Blackburn, 781 F.2d 1138, 1139 (5th Cir. 1986)
- Speight v. Beard, No. CV 04-4110, 2016 WL 8459847, at *4 (E.D. Pa. 2016)
- Speight v. Beard, No. CV-04-4110, 2017 WL 914907, at *1 (E.D. Pa. 2017)