

# LOUISIANA COURT OF APPEAL, FIRST CIRCUIT

## State of Louisiana v. Samuel Lee Hamilton, Jr.

No. 2025 KW 1363 (La. Ct. App. 2026) · No. 2025 KW 1363 · Decided February 23, 2026

### SUMMARY

The Louisiana Court of Appeal, First Circuit denied Samuel Lee Hamilton, Jr.'s application for supervisory writs. The court held that his challenge based on *Ramos v. Louisiana* was untimely because his conviction and sentence were final before *Ramos*, he had not established an exception to the post-conviction filing deadline, and the deadlines for related post-verdict motions had expired.

### CASE DETAILS

|                       |                                                                                                                                                                                   |
|-----------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| COURT                 | Louisiana Court of Appeal, First Circuit                                                                                                                                          |
| WRITING FOR THE COURT | Lanier, J.; Wolfe, J.; Hester, J.                                                                                                                                                 |
| JURISDICTION          | Louisiana Court of Appeal, First Circuit                                                                                                                                          |
| DECIDED               | February 23, 2026                                                                                                                                                                 |
| DOCKET                | 2025 KW 1363                                                                                                                                                                      |
| DISPOSITION           | writ_denied                                                                                                                                                                       |
| PROCEDURAL POSTURE    | Application for supervisory writs seeking post-conviction relief from the Nineteenth Judicial District Court's denial or rejection of a challenge to the conviction and sentence. |
| PRECEDENTIAL VALUE    | unpublished                                                                                                                                                                       |
| PARTIES               | Samuel Lee Hamilton, Jr. v. State of Louisiana                                                                                                                                    |

### TOPICS

- post-conviction relief
- criminal procedure
- appellate procedure
- preservation of error
- fourteenth amendment

### PRACTICE AREAS

- criminal procedure
- post-conviction relief
- appellate procedure

### QUESTIONS PRESENTED

- Whether Hamilton's post-conviction challenge based on the rule announced in *Ramos v. Louisiana* was timely and available when his conviction and sentence were final before *Ramos*.

2. Whether Hamilton could obtain post-conviction review of his sufficiency-of-the-evidence challenge after the deadlines for a motion for new trial and a motion for post-verdict judgment of acquittal had expired.

## HOLDINGS

1. Ramos v. Louisiana is not retroactive in Louisiana, and a relator whose conviction and sentence were final before Ramos must establish a statutory exception to the post-conviction time limitation to proceed.
2. A sufficiency-of-the-evidence challenge is untimely as a request for post-conviction relief when the Article 930.8 period and the deadlines for motions for new trial and post-verdict judgment of acquittal have expired.

## KEY QUOTATIONS

*“If an application for postconviction relief is untimely under Article 930.8, it should not be considered on the merits.”* (at 1)

## FACTUAL BACKGROUND

Hamilton was convicted of attempted second-degree murder and received a sentence that was affirmed on direct appeal. His conviction and sentence were final when the United States Supreme Court decided Ramos v. Louisiana. He later challenged the sufficiency of the evidence through a post-conviction application, but the applicable post-conviction and post-verdict-motion deadlines had expired.

## PROCEDURAL HISTORY

On direct appeal, the Louisiana Court of Appeal, First Circuit, affirmed Hamilton's attempted second-degree murder conviction and sentence. Hamilton later sought post-conviction relief, including an attack on the sufficiency of the evidence based on Ramos v. Louisiana. The First Circuit denied supervisory writs because the Ramos rule was not retroactive in Louisiana, the conviction and sentence were final before Ramos, no exception to the post-conviction time bar was established, and the applicable deadlines for post-verdict motions had expired.

## DISPOSITION

writ\_denied

## CASES CITED

- State v. Hamilton, 561 So. 2d 1021 (La. App. 1st Cir. 1990) (unpublished)
- State v. Reddick, 2021-01893 (La. 10/21/22), 351 So. 3d 273, 283
- Ramos v. Louisiana, 590 U.S. 83, 140 S. Ct. 1390, 206 L. Ed. 2d 583 (2020)
- State v. LeBlanc, 2006-0169 (La. 9/15/06), 937 So. 2d 844 (per curiam)

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