

SIXTH DISTRICT COURT OF APPEAL OF FLORIDA

Patrick Maxwell v. State of Florida

No. 6D2025-0756, Sixth District Court of Appeal of Florida (April 24, 2026)

SUMMARY

The Sixth District Court of Appeal of Florida affirmed the denial of Patrick Maxwell’s request for resentencing. The court held that the trial court properly applied *Pedroza v. State*, which limits juvenile-offender resentencing requirements to sentences of life or their functional equivalent, notwithstanding an earlier mandate for resentencing.

CASE DETAILS

COURT	Sixth District Court of Appeal of Florida
WRITING FOR THE COURT	Per Curiam; Nardella, J.; Smith, J.; Kamoutsas, J.
JURISDICTION	Sixth District Court of Appeal of Florida
DECIDED	April 24, 2026
DOCKET	6D2025-0756
DISPOSITION	affirmed
PROCEDURAL POSTURE	Appeal from the denial of a request for resentencing by the Circuit Court for Orange County.
PRECEDENTIAL VALUE	published
PARTIES	Patrick Maxwell v. State of Florida

TOPICS

- sentencing
- sentence modification
- appellate procedure
- criminal procedure

PRACTICE AREAS

- criminal procedure
- juvenile sentencing
- appellate procedure

QUESTIONS PRESENTED

1. Whether the trial court properly denied a juvenile offender's request for resentencing after an intervening Florida Supreme Court decision held that resentencing is not required unless the sentence is life imprisonment or its functional equivalent.

2. Whether the trial court could comply with the intervening higher-court standard rather than conduct the full resentencing hearing previously ordered by the Fifth District.

HOLDINGS

1. Resentencing for a juvenile offender is not required unless the sentence is life imprisonment or the functional equivalent of life imprisonment; the trial court therefore correctly denied Maxwell's request for resentencing.

KEY QUOTATIONS

“We uphold Pedroza’s sentence because she has not established that it is a life sentence or the functional equivalent of a life sentence.” (at 2)

“There are limited exceptions to this broad and important rule. One exception is when an intervening decision by a higher court supersedes the legal basis of the appellate court’s mandate before the trial court’s judicial labor is complete.” (at 2)

FACTUAL BACKGROUND

Maxwell, a juvenile offender, sought resentencing in connection with a sentence imposed in Orange County case number 2009-CF-013807. Before the full resentencing hearing ordered by the Fifth District could occur, the Florida Supreme Court held in *Pedroza* that juvenile-offender resentencing is not required unless the sentence is life imprisonment or the functional equivalent of life imprisonment.

PROCEDURAL HISTORY

The Circuit Court for Orange County denied Maxwell's request for resentencing. Although the Fifth District had previously reversed and remanded for a full resentencing hearing in *Maxwell v. State*, the Florida Supreme Court subsequently decided *Pedroza v. State*, and the trial court applied *Pedroza*'s standard in denying resentencing. The Sixth District affirmed.

DISPOSITION

affirmed

CASES CITED

- *Maxwell v. State*, 241 So. 3d 277 (Fla. 5th DCA 2018)
- *Pedroza v. State*, 291 So. 3d 541 (Fla. 2020)
- *Gilchrist v. State*, 299 So. 3d 620 (Fla. 5th DCA 2020)
- *McKinney v. Graham*, 414 So. 3d 286 (Fla. 6th DCA 2025)

OPINION

Patrick Maxwell v. State of Florida
PER CURIAM.

SIXTH DISTRICT COURT OF APPEAL
STATE OF FLORIDA

Case No. 6D2025-0756 Lower Tribunal No. 2009-CF-013807

PATRICK MAXWELL,

Appellant, v.

STATE OF FLORIDA,

Appellee. Appeal from the Circuit Court for Orange County.

Michael J. Snure, Judge. April 24, 2026 PER CURIAM. This court finds no error and affirms the lower court's denial of Appellant's request for resentencing. Although the Fifth District reversed and remanded for a full resentencing hearing in *Maxwell v. State*, 241 So. 3d 277, 278 (Fla. 5th DCA 2018), before the resentencing hearing could be conducted, the Florida Supreme Court issued *Pedroza v. State*, 291 So. 3d 541 (Fla. 2020), holding that resentencing for juvenile offenders is not required unless a sentence is for life or a functional equivalent.¹ 291 So. 3d at 549 ("We uphold Pedroza's sentence because she has not established that it is a life sentence or the functional equivalent of a life sentence."); see also *Gilchrist v. State*, 299 So. 3d 620, 621 (Fla. 5th DCA 2020) (affirming "the trial court's order amending the sentences to provide for a review hearing and denying resentencing." (emphasis added)). As such, the trial court was correct to comply with the new legal standard. AFFIRMED. NARDELLA, SMITH and KAMOUTSAS, JJ., concur. Blair Allen, Public Defender, and Susan M. Shanahan, Assistant Public Defender, Bartow, for Appellant. James Uthmeier, Attorney General, Tallahassee, and Rebecca Rock McGuigan, Assistant Attorney General, Daytona Beach, for Appellee.

NOT FINAL UNTIL TIME EXPIRES TO FILE MOTION FOR REHEARING
AND DISPOSITION THEREOF IF FILED

¹ Generally, "[a] mandate communicates the appellate court's judgment to the lower court and directs the lower court's action." *McKinney v. Graham*, 414 So. 3d 286, 290 (Fla. 6th DCA 2025). However, "[t]here are limited exceptions to this broad and important rule. One exception is when an intervening decision by a higher court supersedes the legal basis of the appellate court's mandate before the trial court's judicial labor is complete. The trial court may then disregard the mandate to comply with the new legal standards." *Id.* 2