

# The Supreme Court Update - June 9, 2025

by Ian Blodger, Jessica M. Leano, and Brock Huebner

On June 6, 2025, the Supreme Court of the United States granted certiorari in four cases:

**Coney Island Auto Parts Unlimited, Inc. v. Burton, No. 24-808:** This case concerns the applicability of the “reasonable time” requirement for parties to file a motion under Federal Rule of Civil Procedure 60(c)(1) seeking relief from a judgment or order. The question presented is: Whether Rule 60(c)(1) imposes any time limit to set aside a void default judgment for lack of personal jurisdiction.

**Rutherford v. United States, No. 24-820; Carter v. United States, No. 24-820:** In these consolidated cases, the Court will address the intersection between the compassionate-release statute, 18 U.S.C. § 3582(c)(1)(A), which permits a court to reduce a prisoner’s sentence if the court finds that “extraordinary and compelling reasons” warrant relief, and the First Step Act of 2018, which reduced penalties for drug and firearm offenses. One effect of the First Step Act is that individuals sentenced today for drug and firearm offenses face shorter mandatory minimum sentences compared to those sentenced before the First Step Act’s enactment. The question presented is: Whether a district court may consider disparities created by the First Step Act’s prospective changes in sentencing law when deciding if “extraordinary and compelling reasons” warrant a sentence reduction under 18 U.S.C. § 3582(c)(1)(A)(i).

**Hamm v. Smith, No. 24-872:** This case concerns whether a death sentence for a defendant who is “intellectually disabled” violates the Eighth Amendment’s ban on cruel and unusual punishment. Alabama requires that offenders prove an IQ of 70 or less to satisfy the “intellectual functioning” prong of *Atkins v. Virginia*, 536 U.S. 304 (2002). In *Atkins*, the United States Supreme Court held that executing an individual with intellectual disabilities violates the Eighth Amendment’s ban on cruel and unusual punishment, but allowed states to define what constitutes an “intellectual disability.” The question presented is: Whether and how courts may consider the cumulative effect of multiple IQ scores in assessing an *Atkins* claim.

## Related People

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## Related Capabilities

- Appellate