

The Supreme Court Update - March 23, 2026

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

On March 23, 2026, the Supreme Court of the United States issued one decision:

Zorn v. Linton, No. 25-297: The case addressed a police officer's qualified immunity from a protestor's claims that the officer violated her Fourth Amendment right against excessive use of force. Shela Linton participated in a sit-in protest in the Vermont State House and refused to leave when the capitol closed for the night. Sargeant Jacob Zorn told Linton to stand up and warned that he would have to eventually use force to remove her. After Linton refused to stand, Zorn put Linton's arm behind her back in a rear wristlock, placed pressure on her wrist, and lifted her to her feet. Linton's brought a civil rights action against Zorn under 42 U.S.C. § 1983. The district court granted summary judgment for Zorn, concluding he was entitled to qualified immunity because it was not "clearly established" at the time of the encounter that in these circumstances, lifting Linton while putting pressure on her wrist violated the Fourth Amendment. The Second Circuit reversed, holding that Zorn was not entitled to qualified immunity based on *Amnesty America v. West Hartford*, 361 F.3d 113 (2d. Cir. 2004), a decision that "clearly established" that the "gratuitous" use of a rear wrist lock on a protestor passively resisting arrest constitutes excessive force. In a per curiam decision, the Court granted the petition for certiorari and reversed the Second Circuit. Government officials enjoy qualified immunity from suit under § 1983 unless their conduct violates "clearly established" law. To find that a right is clearly established, courts generally "need to identify a case where an officer acting under similar circumstances ... was held to have violated" the Constitution. Zorn was entitled to qualified immunity because *Amnesty America* did not clearly establish that his specific conduct violated the Fourth Amendment, and the Second Circuit failed to identify a case where an officer taking similar actions in similar circumstances was held to have violated the Constitution. Justice Sotomayor, joined by Justices Kagan and Jackson, dissented, agreeing with the Second Circuit that the district court should have denied summary judgment for Zorn because a jury could find that his use of force was excessive and violated Linton's clearly established rights.

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