

The Supreme Court Update - March 28, 2023

by Brock Huebner

Today, the Supreme Court of the United States issued one decision:

Wilkins v. United States, No. 21-1164: This case considered the question of whether the 12-year statute of limitations in the Quiet Title Act is jurisdictional, and thus not subject to exceptions. Two Montana landowners grew dissatisfied with the U.S. Government's use of a road across their land, access to which was originally granted via a 1962 easement. In 2018, the landowners filed suit under the Quiet Title Act, a statute that allows challenges to the federal government's real property rights. Lower courts dismissed the suit under the Act's 12-year statute of limitations. In a 6-3 decision authored by Justice Sotomayor, the Court reversed the suit's dismissal and held that the Quiet Title Act's statute of limitations was not a jurisdictional barrier to suit, but was instead a "non-jurisdictional claims-processing rule," potentially subject to exceptions like waiver or estoppel. The Court analyzed the text of the Quiet Title Act and previous Court opinions interpreting the Act before concluding that Congress never provided the requisite clear statement of intent to overcome the presumption that statutes' time bars are non-jurisdictional. Justice Thomas filed a dissenting opinion joined by Chief Justice Roberts and Justice Alito.

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