No. 18-7739

In the Supreme Court of the United States

GONZALO HOLGUIN-HERNANDEZ, PETITIONER

v.

UNITED STATES OF AMERICA

ON WRIT OF CERTIORARI
TO THE UNITED STATES COURT OF APPEALS
FOR THE FIFTH CIRCUIT

REPLY BRIEF FOR THE UNITED STATES

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The Court-appointed amicus curiae and the government share much common ground. The government agrees that Federal Rule of Criminal Procedure 51 applies to sentencing, that it requires an independent objection to procedural errors, and that it also requires a defendant to raise in the district court all of the facts and circumstances on which a substantive-reasonableness claim would be based. The government's narrow disagreement with the amicus is limited to his defense of the Fifth Circuit's idiosyncratic practice of requiring a defendant who has already argued for a lower sentence based on all of the relevant facts and circumstances to preserve a substantive-reasonableness claim by framing an objection in those specific terms after the sentence is imposed. That additional requirement improperly conflates the standard of appellate review with the issue before the district court. And because the court

of appeals relied on that erroneous requirement, vacatur is appropriate.

A. A Specific Request For A Lower Sentence Can Satisfy Rule 51's Contemporaneous-Objection Requirement

Federal Rule of Criminal Procedure 51 specifies that in order to preserve a claim for appellate review, a party must "inform[] the court—when the court ruling or order is made or sought—of the action the party wishes the court to take, or the party's objection to the court's action and the grounds for that objection." Fed. R. Crim. P. 51(b). Under Rule 52, a claim that is not preserved in that manner is subject to review only for plain error. Fed. R. Crim. P. 52(b). The government agrees with the amicus (Amicus Br. 11-13) that Rules 51 and 52 require preservation of claims of error in the sentencing context, just as elsewhere. See, *e.g.*, *Molina-Martinez* v. *United States*, 136 S. Ct. 1338, 1343 (2016). As explained in the government's opening brief (at 20-31), however, those Rules do not support the Fifth Circuit's unique requirement that a defendant who sought a lower sentence must "object at sentencing to the reasonableness of" a higher sentence in order to preserve a substantive-reasonableness claim for appellate review, *United States* v. *Peltier*, 505 F.3d 389, 391 (2007), cert. denied, 554 U.S. 921 (2008); see J.A. 2.

1. When a criminal defendant advocates for a shorter sentence in the district court, he identifies and preserves a general substantive objection to the subsequent imposition of a longer sentence. He does so by putting the court on notice "of the action the [defendant] wishes the court to take," Fed. R. Crim. P. 51(b)—namely, imposing a lower sentence in light of the circumstances presented to the court. Under the plain terms of Rule 51, a defendant (or the government) may preserve a legal

claim *either* by advocating for a result that the district court thereafter rejects "*or*" by objecting once an adverse ruling is made. *Ibid.* (emphasis added). The Rule does not require both.

Yet the Fifth Circuit does. See *Peltier*, 505 F.3d at 391; see also J.A. 2. The amicus suggests (Br. 30) that "[i]t is not at all clear" that the Fifth Circuit in fact imposes such a repetitive-objection requirement. But the amicus fails to identify any decision in which the court of appeals has found that a party had preserved a substantive-reasonableness objection through a sentencing request. See *United States* v. *Heard*, 709 F.3d 413, 425 (5th Cir.) (concluding that defendant did not preserve claim of substantive unreasonableness), cert. denied, 571 U.S. 973 (2013); *United States* v. *Neal*, 578 F.3d 270, 272 (5th Cir. 2009) (concluding that defendant preserved claim of procedural error).

2. The Fifth Circuit's repetitive-objection requirement is not only inconsistent with the text of Rule 51, but also pointless. A criminal defendant who has asked for a lower sentence has communicated the grounds for his request. Under 18 U.S.C. 3553(a), a court must "impose a sentence sufficient, but not greater than necessary," to achieve various purposes defined by Congress. And a defendant who advocates for a lower sentence makes clear that, in his view, the circumstances presented to the court demonstrate that a higher sentence would be "greater than necessary" to effectuate Section 3553(a)'s purposes.

This case is illustrative. Petitioner requested "no additional time" or "certainly less than the" Sentencing Commission's recommendation of 12 to 18 months of imprisonment. J.A. 10; see J.A. 9. He highlighted the circumstances that he believed justified that request. J.A.

9-10. And he even made explicit the legal test that is ordinarily implicit: that, in his view, "[t]here would be no reason under [Section] 3553" to impose a longer term of imprisonment. J.A. 10. A defendant who, like petitioner, advocates for a lower sentence has thus communicated both his request and the basis for his request. That is all that Rule 51 requires.

The amicus asserts (Br. 18) that a requirement to incant the words "substantively unreasonable" after a sentence is imposed, see J.A. 2, serves the additional function of compelling a defendant to "specifically argue to the district court that his imposed sentence exceeds the range of reasonable sentences that [18 U.S.C. 3553(a)] allows." But such an argument is irrelevant. Only *after* a sentence is appealed—if it is appealed at all—would "reasonableness" enter the case. At that point, the court of appeals applies "appellate 'reasonableness' review," which "asks whether the trial court abused its discretion." *Rita* v. *United States*, 551 U.S. 338, 351 (2007); see *Gall* v. *United States*, 552 U.S. 38, 56 (2007) (explaining that a court of appeals considers "whether the sentence was reasonable—*i.e.*, whether the District Judge abused his discretion in determining that the § 3553(a) factors supported" it). And because "'reasonableness' is the *standard controlling appellate review*," *Kimbrough* v. *United States*, 552 U.S. 85, 90-91 (2007) (emphasis added), it is not a district court's job to select a sentence that is "not unreasonable," any more than it is a district court's job to make factual findings that are "not clearly erroneous."

As this Court explained in *Rita* v. *United States*, *supra*, Section 3553(a) "tells the sentencing judge to 'impose a sentence sufficient, but not greater than necessary, to comply with' the basic aims of sentencing" that

Congress has identified. 551 U.S. at 348; see *Pepper* v. *United States*, 562 U.S. 476, 491 (2011) (similar). A district court arrives at that result by considering the advisory Sentencing Guidelines and "subject[ing] the defendant's sentence to the thorough adversarial testing contemplated by federal sentencing procedure." *Rita*, 551 U.S. at 351. In determining a sentence, "the district judge should * * * consider all of the § 3553(a) factors" and then "settl[e] on the appropriate sentence," *Gall*, 552 U.S. at 49-50—not simply a "reasonable" one, see *Rita*, 551 U.S. at 358.

The amicus, like the Fifth Circuit, fails to explain why a party must invoke the appellate standard of review to preserve a substantive-reasonableness claim. The amicus observes that (Br. 16-17) a range of sentences may be reasonable and that (Br. 21) a party's arguments to the district court "about the specific sentence the district court *should* impose after evaluating the § 3553(a) factors" do not define "the maximum sentence the court *could* impose under those factors." But a defendant's assertion that a sentence is "unreasonable" is not meaningful to the district court. If a district court has found that a sentence is "appropriate," it has necessarily concluded that the sentence is within the range of sentences that would be reasonable. And while a court of appeals may be indifferent between possible reasonable sentences, a district court—tasked with selecting a sentence in the first instance—may not.

3. The amicus's objections to the government's position rest largely on a misunderstanding of that position. The amicus asserts (Br. 23) that the government's position would "have the effect of preserving *all* arguments regarding the length of a sentence, regardless of whether

the facts supporting those arguments were ever presented to the district court." But as the government explained in its opening brief (at 22-23), a defendant's argument for a lower sentence does *not* "preserve a claim that the [district] court's sentence fails to account for circumstances that were never presented to the court in the first place."

The government agrees with amicus (Amicus Br. 14-15) that a defendant who, for example, advocates for a lenient sentence in the district court based solely on his physical illness has not preserved for appeal an argument that his sentence was substantively unreasonable because the district court did not account for his efforts to rehabilitate since his crime. See, *e.g.*, *United States* v. *Vonner*, 516 F.3d 382, 392 (6th Cir.) (en banc), cert. denied, 555 U.S. 816 (2008) ("While we do not require defendants to challenge the 'reasonableness' of their sentences in front of the district court, we surely should apply plain-error review to any arguments for leniency that the defendant does not present to the trial court."). A party cannot preserve a legal claim under Rule 51 unless it communicates "the grounds for" that claim. Fed. R. Crim. P. 51(b). Although the Rule itself refers to the inclusion of "grounds" only when a party preserves a claim through an "objection," *ibid.*, preservation through a requested "action," *ibid.*, necessarily also includes presenting the district court with the reasons for taking that action. Cf. Fed. R. Crim. P. 47(b) (requiring motion to "state the grounds on which it is based").

The question presented here, however, concerns the propriety of the Fifth Circuit's approach, under which even a defendant whose request for a lower sentence identifies all of the grounds on which an appellate claim

would rely must *still* make a separate "substantive reasonableness" objection after a higher sentence is imposed. That requirement does nothing to address any concerns that a defendant's appeal will rely on facts and circumstances that he did not rely on in the district court. A formulaic invocation of "substantive reasonableness" does not in itself identify why the defendant believes that a sentence is too long. Instead, the Fifth Circuit's approach addresses the *label* that a defendant must use ("15 months is unreasonable" rather than "10 months is appropriate"), and the *timing* of the claim (after the sentence rather than, or in addition to, before it). But those features are irrelevant to the specificity of the objection.

The amicus notes (Br. 26-27) that, in the case in which the Fifth Circuit originally adopted its inflexible rule, *United States* v. *Peltier*, *supra*, the defendant had relied on new circumstances in the court of appeals to justify his argument for a lower sentence. But the court did not apply plain-error review for that reason. Instead, it applied plain-error review simply because the defendant had failed to object to the sentence as substantively unreasonable in the district court. See *Peltier*, 505 F.3d at 391-392 & n.2. That is how *Peltier* has been understood, and how the court of appeals applied it here. See J.A. 2 ("[Petitioner] acknowledges that we apply plain error review when a defendant fails to object in the district court to the reasonableness of the sentence imposed."); see also *United States* v. *Whitelaw*, 580 F.3d 256, 259-260 (5th Cir. 2009) (explaining that a "request for a sentence at the low end of the guidelines range [is] insufficient to preserve the substantive reasonableness of the sentence for review" because *Peltier* determined that "a defendant must object

to a sentence as unreasonable to preserve a substantive reasonableness challenge").

4. The amicus errs in attempting (*e.g.*, Br. 23-24, 28-29) to draw support for the Fifth Circuit's approach to preservation of *substantive*-reasonableness claims from the typical requirement that a defendant lodge a specific after-the-fact objection in order to preserve a claim of *procedural* error at sentencing. Rules 51 and 52 require that both types of claims be preserved. See *United States* v. *Booker*, 543 U.S. 220, 268 (2005) (explaining that appellate courts should apply "ordinary prudential doctrines" at sentencing, including "whether the issue was raised below and whether it fails the 'plain-error' test"). But the distinct nature of each claim necessarily affects *how* it can ordinarily be preserved.

With substantive-reasonableness claims, a defendant who argues that his circumstances call for a lower sentence under Section 3553(a) has made the same fundamental argument that he will make on appeal if the district court rejects that argument and adopts a different substantive evaluation of the circumstances presented. Because the basic function of a sentencing hearing is to determine the appropriate substantive result under Section 3553(a), see generally Fed. R. Crim. P. 32, a substantive-reasonableness claim will often be preserved through the first of Rule 51's two alternatives: informing the court "of the action the party wishes the court to take." Fed. R. Crim. P. 51(b).

The same is not true of claims of procedural error at sentencing. An argument for a particular sentence does not in itself provide the district court with "the opportunity to consider and resolve" the propriety of the procedures it employed in deciding on that sentence, *Puckett* v. *United States*, 556 U.S. 129, 134 (2009). As a

result, Rule 51 requires a separate argument or objection about an asserted procedural error, independent from a defendant's substantive arguments about the appropriate length of the sentence. Furthermore, because of the nature of procedural errors, a defendant will typically be unable to bring them to the court's attention before they occur. A defendant cannot generally anticipate that a district court will, for example, rely on an improper sentencing factor, make a clearly erroneous factual finding, or inadequately explain its sentencing decision. See *Gall*, 552 U.S. at 51. But the defendant can anticipate that the court will select a sentence. He therefore can and should present all of his arguments for the sentence he views as appropriate (and reasonable) before the district court makes its ruling.

The amicus's concern (Br. 25) that litigants will "try to couch their arguments under the rubric of substantive reasonableness, where possible, in an attempt to evade plain-error review" is mistaken. The touchstone of Rule 51's preservation requirement is always whether a litigant has "'ma[de] timely assertion of the right before a tribunal having jurisdiction to determine it,'" and has "give[n] the district court the opportunity to consider and resolve" it. *Puckett*, 556 U.S. at 134 (citation omitted). A defendant who argued for a particular sentence based on the circumstances of his case has provided the district court an opportunity to consider those circumstances. He has therefore preserved that argument—and only that argument—for appeal, where it will be subject to review under a substantive-reasonableness standard. Any other claim of sentencing error, whether labeled substantive or procedural, is not subsumed within

the defendant's request for a lower sentence and therefore requires some specific additional action in the district court in order to preserve the claim for appeal.

To the extent the amicus suggests (Br. 28) that a requirement to intone the appellate standard of "substantive reasonableness" in the district court makes sense because "'procedural reasonableness' is also an appellate standard," that suggestion is misconceived. "Procedural reasonableness" is not an appellate standard; it is an umbrella term that courts have adopted to encompass the range of procedural errors that a district court may commit in imposing a sentence. See *Gall*, 552 U.S. at 51 (explaining that an appellate court must "ensure that the district court committed no significant procedural error, such as failing to calculate (or improperly calculating) the Guidelines range, treating the Guidelines as mandatory, failing to consider the § 3553(a) factors, selecting a sentence based on clearly erroneous facts, or failing to adequately explain the chosen sentence"). And courts of appeals in fact apply different standards of review to different types of "procedural reasonableness" claims, with legal determinations reviewed de novo and factual findings reviewed for clear error. See, *e.g.*, *United States* v. *Maisonet-González*, 785 F.3d 757, 762 (1st Cir.), cert. denied, 136 S. Ct. 263 (2015); *United States* v. *French*, 719 F.3d 1002, 1007 (8th Cir. 2013); *United States* v. *Simmons*, 568 F.3d 564, 566 (5th Cir. 2009). Simply intoning "procedural reasonableness" to the district court would therefore not be enough to put the court on notice of a specific error and thus to preserve a claim of error under Rule 51.

5. Finally, the amicus's efforts (Br. 31-32) to analogize preservation of a claim about the length of a sentence to preservation of claims outside the sentencing

context altogether—namely, challenges to jury instructions or to civil damages—are likewise misguided.

For jury instructions, a specific provision in Federal Rule of Criminal Procedure 30 governs the proper form and timing of an objection. Under Rule 30, even if a party has requested a jury instruction, "[a] party who objects * * * to a failure to give a requested instruction must inform the court of the specific objection and the grounds for the objection before the jury retires to deliberate." Fed. R. Crim. P. 30(d). The "[f]ailure to object in accordance with this rule precludes appellate review, except as permitted under Rule 52(b)." *Ibid.* The reason for that particular procedure is that, in the absence of a specific objection, the district court will not necessarily be on notice that the instruction it gave is unsatisfactory. See *Jones* v. *United States*, 527 U.S. 373, 388 (1999) (explaining that, without an objection to the instructions selected, "district judges would have to speculate on what sorts of objections might be implied through a request for an instruction"). The simple fact that the district court rejected a party's preferred formulation of a jury instruction does not in itself mean that the formulation the court did adopt was substantively inadequate to address the party's concerns.

The procedures for objecting to excessive civil damages awards are also inapposite. Most obviously, such objections are not subject to Federal Rules of Criminal Procedure 51 and 52. The cases cited by the amicus (Br. 32) involve one of two scenarios, neither of which is analogous to a dispute about the length of a sentence in a criminal case. The first scenario is when a party asks a court to override a jury's damages award. See, *e.g.*, *O'Connor* v. *Huard*, 117 F.3d 12, 18 (1st Cir. 1997), cert. denied, 522 U.S. 1047 (1998); *Young* v. *Langley*, 793 F.2d

792, 794 (6th Cir.), cert. denied, 479 U.S. 950 (1986). If the party has not brought a post-trial motion asking the district court to set aside the verdict as a matter of law under Federal Rule of Civil Procedure 50, or to order a new trial to avoid a miscarriage of justice under Federal Rule of Civil Procedure 59, the district court will not have had any opportunity to address the relevant issues. No analogous lack of opportunity exists in the context of criminal sentencing, where the district court will necessarily decide on a sentence in every case.

The second scenario is when a defendant raises a due process challenge to a punitive-damages award. See *Local Union No. 38, Sheet Metal Workers' Int'l Ass'n* v. *Pelella*, 350 F.3d 73, 89 (2d Cir. 2003), cert. denied, 541 U.S. 1086 (2004). Such an excessiveness challenge is a freestanding constitutional objection that requires a court to apply an independent substantive standard. See *State Farm Mut. Auto. Ins. Co.* v. *Campbell*, 538 U.S. 408, 416-428 (2003) (describing standards under the Due Process Clause for reviewing punitive-damages awards). Consideration of that type of challenge is thus akin to an Eighth Amendment challenge to a sentence, which a defendant must separately raise in order to preserve for appellate review. See, *e.g.*, *United States* v. *Flanders*, 752 F.3d 1317, 1342 (11th Cir. 2014), cert. denied, 135 S. Ct. 1188 (2015); *United States* v. *Miknevich*, 638 F.3d 178, 185 (3d Cir.), cert. denied, 565 U.S. 847 (2011); *United States* v. *Ming Hong*, 242 F.3d 528, 532 (4th Cir.), cert. denied, 534 U.S. 823 (2001). It is not akin to the basic debate over the proper length of a sentence, which is the entire point of the sentencing proceeding.

B. This Court Should Vacate The Judgment Below

For the reasons explained above and in the government's opening brief, the court of appeals in this case applied an incorrect standard of review. This Court's ordinary practice in such cases is to vacate the decision below for reconsideration under the correct standard. That ordinary practice would be appropriate here.

1. The court of appeals held that petitioner's substantive-reasonableness challenge was subject to plain-error review because petitioner "fail[ed] to object in the district court to the reasonableness of the sentence imposed." J.A. 2. Under a proper application of Rule 51, petitioner preserved at least the core of his substantive-reasonableness claim.

Petitioner contended in the district court that "no additional time or certainly less than the guidelines" recommendation of 12 to 18 months of imprisonment would be appropriate, at least if the court were "going to add [a revocation term] consecutive" to his five-year sentence for the underlying drug offense. J.A. 10; see J.A. 9. And he identified several bases for that claim, including his assertions that his sentence for the underlying offense "overrepresents the role that he played"; that "[t]here would be no reason under [Section] 3553 that an additional consecutive sentence would get his attention any better than five years does"; and that he had been warned that he could face up to life in prison if he were to reoffend. J.A. 10. On appeal, petitioner relied on those same basic arguments to contend that his 12-month term of imprisonment was substantively unreasonable because it was unnecessary for effective deterrence. See Pet. C.A. Br. 10-13; Pet. C.A. Reply Br. 3-5.

The amicus focuses (Br. 33-35) on an assertion that appears in petitioner's appellate brief but that petitioner did not raise in district court—namely, that he did not pose a danger to the public. See Pet. C.A. Br. 11. The court of appeals would be in the best position to assess, on remand, the role of that assertion in petitioner's brief before that court. If the assertion is intended as a new basis for contesting the length of his sentence, then he failed to preserve it. If it is instead simply an observation that the district court itself did not rely on his perceived dangerousness as support for the sentence it imposed, then it does not expand his sentencing challenge beyond the facts and circumstances presented to the district court.

2. The amicus also argues (Br. 35-37) that, even without plain-error review, the court of appeals would have affirmed the district court's judgment. The government made the same argument in its brief in opposition to certiorari (at 8-11) and in its opening brief (at 32-33). As the amicus explains (Br. 35-36), particularly where a court of appeals relies on the first and second elements of plain-error review (which address the existence and obviousness of an error) to reject a substantive-reasonableness claim, it is difficult to see how that court could reach a different result if it were to apply the deferential standard that governs even preserved substantive-reasonableness claims.

Nevertheless, the court of appeals was incorrect to apply plain-error review here. See J.A. 2. And the circumstances do not require a departure from the Court's ordinary practice of allowing a lower court to apply the appropriate standard of review in the first instance. See, *e.g.*, *Tapia* v. *United States*, 564 U.S. 319, 335 (2011); *United States* v. *Marcus*, 560 U.S. 258, 266-267

(2010). The government accordingly has not urged the Court to address in the first instance the substantive reasonableness of petitioner's term of imprisonment.

* * * * *

For the foregoing reasons and those stated in our opening brief, the judgment of the court of appeals should be vacated and the case remanded for further proceedings.

Respectfully submitted.

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