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No. 25-1304

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In the  
**Supreme Court of the United States**

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ROBERT T. WILSON, JR.,  
*Petitioner,*

v.

CHARLES RANDALL WATTS, et al.,  
*Respondents.*

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ON PETITION FOR A WRIT OF CERTIORARI  
TO THE SUPREME COURT OF ALABAMA

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**PETITION FOR A WRIT OF CERTIORARI**

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Robert T Wilson Jr., *Pro Se* Petitioner  
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## QUESTIONS PRESENTED

1. Whether the Due Process Clause of the Fourteenth Amendment permits a state supreme court to affirm, without opinion or constitutional analysis, a punitive damages award challenged as grossly excessive under *BMW of North America, Inc. v. Gore*, 517 U.S. 559 (1996), *State Farm Mut. Auto. Ins. Co. v. Campbell*, 538 U.S. 408 (2003), and *Cooper Industries, Inc. v. Leatherman Tool Group, Inc.*, 532 U.S. 424 (2001).
2. Whether due process is violated where a substantial punitive damages award is imposed after trial proceedings infected by the denial of meaningful judicial review, including the refusal to rule substantively on motions for judgment as a matter of law, remittitur, and new trial raising federal constitutional objections.

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## **LIST OF PARTIES**

Petitioner is Robert T. Wilson, Jr.

Respondents are Mark E. Wilson; Charles Randall Watts, individually; and Charles Randall Watts, as Executor of the Estate of Sonya Yvonne Watts, deceased.

Defendant below, Wilson & Wilson Attorneys and Counselors, P.C., is not a party to this Petition.

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## **RELATED PROCEEDINGS**

Walker County, Alabama, Circuit Court  
Robert T. Wilson v. Charles Randall Watts  
Case No. CV-2025-000020.00

Walker County, Alabama, Circuit Court  
Charles Randall Watts, Charles Randall Watts, as  
Executor v. Mark E. Wilson, Robert T. Wilson, Jr.,  
Wilson & Wilson Attorneys & Counselors, P.C.  
Case No. CV-2022-900190.00  
October 9, 2024; post-judgment orders entered  
December 13, 2024

Alabama Supreme Court  
Robert T. Wilson, Jr., and Wilson & Wilson  
Attorneys and Counselors, P.C. v. Mark E. Wilson  
and Charles Randall Watts, individually and as  
executor of the Estate of Sonya Yvonne Watts,  
deceased  
SC-2025-0032  
Judgment entered October 10, 2025

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## **OPINIONS BELOW**

The Supreme Court of Alabama affirmed the judgment without opinion on October 10, 2025. No written opinion was issued. The order cited Rule 53(a)(1) and (a)(2)(F), Alabama Rules of Appellate Procedure.

## **JURISDICTION**

The judgment of the Supreme Court of Alabama was entered on October 10, 2025. The Supreme Court of Alabama is the court of last resort. No timely application for rehearing was filed.

This Court has jurisdiction under 28 U.S.C. § 1257(a) to review final judgments of a state court of last resort where the validity of a judgment is challenged on federal constitutional grounds. Pursuant to Rule 13.1 of the Rules of this Court, the ninety-day period for filing a petition for a writ of certiorari began to run on October 11, 2025, and expired on January 8, 2026. This petition is timely.

## **CONSTITUTIONAL PROVISIONS INVOLVED**

U.S. Const. amend. XIV, § 1 “No State shall ... deprive any person of life, liberty, or property, without due process of law ....”

## **STATEMENT OF THE CASE**

This case arises from a civil action in the Circuit Court of Walker County, Alabama. The underlying dispute involved alleged conversion of

funds and related claims. Prior to trial, the circuit court entered partial summary judgment awarding compensatory damages.

At trial, the jury awarded \$800,000 in punitive damages against Petitioner Robert T. Wilson, Jr., in favor of Respondent Charles Randall Watts. Following the jury verdict, Petitioner timely moved for judgment as a matter of law, for a new trial, and for remittitur, expressly arguing that the punitive damages award violated the Due Process Clause under *BMW of North America, Inc. v. Gore* and *State Farm Mutual Automobile Insurance Co. v. Campbell*. On December 13, 2024, the circuit court denied each of those motions, including the motion for remittitur, without conducting or articulating any constitutional analysis of the excessiveness of the punitive damages award. The trial court denied post-trial motions seeking remittitur and new trial, issuing only brief denials.

Petitioner timely appealed to the Supreme Court of Alabama, expressly raising federal constitutional challenges to the punitive damages award under the Due Process Clause, relying on *BMW of North America, Inc. v. Gore*, *State Farm Mutual Automobile Insurance Co. v. Campbell*, and *Cooper Industries, Inc. v. Leatherman Tool Group, Inc.*

Petitioner argued, among other things, that:

- The punitive damages award was grossly excessive;
- The ratio of punitive to compensatory damages exceeded constitutional limits;

- The conduct involved purely economic harm;
- There was no meaningful evidence of profit or ongoing danger;
- The trial court failed to conduct the constitutionally required analysis.

On October 10, 2025, the Supreme Court of Alabama affirmed without opinion, issuing no constitutional analysis and no explanation addressing Petitioner's federal claims.

## **REASONS FOR GRANTING THE PETITION**

### **I. The Decision Below Conflicts with This Court's Due Process Jurisprudence Requiring Meaningful Judicial Review of Punitive Damages**

This Court has repeatedly held that punitive damages awards implicate the Due Process Clause of the Fourteenth Amendment and are subject to meaningful judicial review to ensure that punishment is not arbitrary or grossly excessive. *BMW of North America, Inc. v. Gore*, 517 U.S. 559 (1996); *State Farm Mut. Auto. Ins. Co. v. Campbell*, 538 U.S. 408 (2003); *Cooper Industries, Inc. v. Leatherman Tool Group, Inc.*, 532 U.S. 424 (2001).

Under this Court's precedents, courts must evaluate punitive damages using identifiable constitutional guideposts, including: (1) the degree of reprehensibility of the defendant's conduct; (2) the ratio between punitive and compensatory damages; and (3) a comparison between the punitive award and civil or criminal penalties authorized for comparable

conduct. *BMW*, 517 U.S. at 575–85. Petitioner repeatedly and expressly raised federal constitutional objections to the punitive damages award, including in motions for judgment as a matter of law, motion for new trial, and motion for remittitur. Those motions specifically argued that the punitive damages award violated due process because it was grossly excessive, disproportionate to the compensatory damages, unsupported by findings of heightened reprehensibility, and inconsistent with this Court's guideposts.

Despite the preservation of these federal constitutional claims, the trial court denied the motions without articulating any constitutional analysis. The Supreme Court of Alabama then affirmed without opinion, issuing no explanation and no indication that it conducted the independent constitutional review required by this Court's decisions.

A silent affirmance in the face of a preserved federal due-process challenge is incompatible with *Cooper Industries*, which requires appellate courts to conduct de novo review of the constitutionality of punitive damages awards. When a state court of last resort affirms without analysis, it is impossible to determine whether the court applied this Court's controlling precedent or disregarded it altogether.

This Court has granted certiorari where state courts failed to apply or meaningfully engage with federal constitutional standards governing punitive damages. The decision below squarely conflicts with that jurisprudence and warrants this Court's review.

## **II. The Proceedings Below Denied Petitioner's Procedural Due Process by Failing to Provide Any Meaningful Judicial Review of the Punitive Damages Award**

This Court has made clear that due process requires not only that punitive damages awards be constrained in substance, but that courts provide meaningful judicial review to guard against arbitrary deprivation of property. *Honda Motor Co. v. Oberg*, 512 U.S. 415, 420–21 (1994).

In this case, Petitioner repeatedly invoked federal due process protections at every available stage of the proceedings. Petitioner filed motions for judgment as a matter of law, motion for new trial, and motion for remittitur, each of which expressly challenged the punitive damages award as constitutionally excessive under this Court's decisions in *BMW of North America, Inc. v. Gore* and *State Farm Mutual Automobile Insurance Co. v. Campbell*.

Those motions specifically argued that the punitive damages award was unsupported by findings of heightened reprehensibility, grossly disproportionate to the compensatory damages, and far exceeded any civil or criminal penalties authorized for comparable conduct. Petitioner further argued that the trial proceedings were infected by prejudice and procedural irregularities that magnified the risk of an arbitrary punitive award.

The trial court denied these motions without conducting or articulating any constitutional analysis. The Supreme Court of Alabama then

affirmed the judgment without opinion, issuing no explanation and no indication that it independently reviewed the punitive damages award for compliance with federal due process standards. Thus, at every level of the proceedings—summary adjudication of liability, denial of post-trial motions challenging the punitive award, and final review by the court of last resort—Petitioner’s preserved federal due process objections were rejected without any articulated constitutional analysis.

The combined effect of these rulings was the complete denial of meaningful judicial review. Where both the trial court and the court of last resort decline to engage with preserved federal constitutional objections, the constitutional guarantee of due process becomes illusory.

This Court has held that “meaningful judicial review” is a critical safeguard against arbitrary punitive damages. *Oberg*, 512 U.S. at 432. The absence of any articulated review in this case creates precisely the risk that due process is designed to prevent: punishment imposed without constitutional constraint.

The decision below therefore conflicts not only with this Court’s punitive-damages precedents, but with foundational due-process principles requiring judicial oversight when the State authorizes punitive sanctions.

### **III. The Punitive Damages Award in This Case Illustrates the Constitutional Danger of Unreviewed Punishment**

The jury awarded \$200,000 in compensatory damages and \$800,000 in punitive damages. The judgment also reiterated a prior compensatory award of \$160,696.46 entered on partial summary judgment. However measured, the punitive award was substantial and warranted the independent constitutional review required by *BMW*, *State Farm*, and *Cooper Industries*.

Petitioner further demonstrated that the conduct at issue did not involve repeated misconduct, physical harm, or indifference to health or safety—the factors this Court has identified as most relevant to heightened reprehensibility. Nonetheless, neither the trial court nor the Supreme Court of Alabama addressed these considerations.

The failure to conduct or articulate constitutional review allowed a substantial punitive sanction to stand without any assurance that it was the product of reasoned application of federal law rather than passion, prejudice, or arbitrary punishment. That result is precisely what the Due Process Clause forbids.

### **IV. This Case Is an Ideal Vehicle for Resolving the Question Presented**

This case presents a clean and suitable vehicle for this Court's review. The federal constitutional issues were squarely raised, fully preserved, and

repeatedly presented at every relevant stage of the proceedings. The judgment is final. There are no jurisdictional defects, no interlocutory complications, and no disputed procedural bars.

Moreover, the absence of an opinion below is itself the constitutional problem. This Court need not review disputed facts or second-guess a state court's reasoning; rather, the Court is asked to decide whether due process permits the complete absence of constitutional reasoning where punitive damages are challenged under established federal law. Few cases present the issue so directly.

#### **V. Review Is Necessary to Preserve the Integrity of Federal Due Process Protections**

Punitive damages remain a common and consequential feature of civil litigation nationwide. Without meaningful judicial review, punitive damages risk becoming instruments of arbitrary punishment rather than measured deterrence.

This Court's intervention is necessary to reaffirm that due process requires more than conclusory affirmance—that when federal constitutional rights are invoked, courts must demonstrate that those rights have been respected.

#### **CONCLUSION**

For the foregoing reasons, the Petition for a Writ of Certiorari should be granted.

**CONCLUSION**

For the foregoing reasons, the Petition for a Writ of Certiorari should be granted.

Respectfully submitted,

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