

Sheppard v. Maxwell,  
384 U.S. 333 (1966)  
and Williams v. Florida  
399 U.S. 78

Law



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Case Summary of the of the Case Summary Sheppard v Maxwell Facts of the Case In Sheppard v Maxwell, Sheppard was convicted of second degree murder by the trial court, for murdering his pregnant wife. He claimed to be innocent and alleged that the trial was unfair, as the trial judge had not safeguarded him from the enormous, extensive, and damaging publicity associated with his prosecution. Certiorari was granted by the US Supreme Court (U. S. Supreme Court, Sheppard v Maxwell, 384 U. S. 333 (1966) , 1966).

#### Issue

Whether balance between the Sixth Amendment's guarantee of a fair trial and the First Amendment's freedom of press had been preserved in the trial court.

#### Importance of the Case

The US Supreme Court made the strongest statement supporting the right of the defendant to a jury that was not biased by prejudicial pre-trial publicity. The unprecedented penetration of contemporary communications and the extreme difficulty associated with obliterating prejudicial publicity from the perception of the jury, necessitate the trial courts to adopt stringent measures to prevent a bias against the accused.

#### Holding

The US Supreme Court found that the accused had been denied due process and reversed his conviction. With regard to the balance to be maintained between the First and Sixth Amendment rights, the Court held that collaboration between the press and counsel, regarding information influencing the fairness of the trial was subject to regulation, and was

extremely censurable and merited disciplinary measures.

#### Reasoning

The US Supreme Court decried the absence of decorum in the trial court, and the free reign given to the press during the hearing. The prejudicial posturing of the press had biased the jury, which declared the accused guilty, on the basis of the adverse publicity promoted by the press and not the evidence.

#### Significance of the Case

The US Supreme Court reviewed the judiciary's authority to control proceedings in criminal cases, and held that trial courts had the necessary authority to exercise such control.

#### Williams V Florida

##### Facts

In Williams v Florida, the prosecution admitted the deposition of an alibi witness to establish the guilt of the accused. The latter was convicted, and the conviction was upheld by the appellate court. At the US Supreme Court, Williams contended that his Fifth Amendment rights had been breached, as the evidence of the alibi witness had been utilized for convicting him. He also contended that his Sixth Amendment rights were violated, as the denial of a 12-man jury had deprived him of his right to trial by jury. (U. S. Supreme Court, Williams v. Florida, 399 U. S. 78 (1970), 1970).

##### Issue

Whether using the alibi witness's deposition by the State for impeaching the accused was unfair and unconstitutional.

##### Importance of the Case

In this case it was held that the privilege against compulsory self-

incrimination did not ensure to the defendant, the right to confound the State with an alibi defense.

#### Holding

In this case, the US Supreme Court set aside precedent and legal tradition and declared the 12-man jury to be the perpetuation of a traditional idiosyncrasy. Accordingly, the Court upheld the constitutionality of the six-man jury, and held the 12-man jury to be its operational counterpart.

#### Reasoning

The US Supreme Court held that the Florida criminal procedure did not force petitioners to provide courts with self-incriminatory evidence. Consequently, the privilege against self-incrimination was not breached. Moreover, it was not essential to have a 12-man jury for non-capital offenses.

#### Significance of the Case

The ruling in *Williams v Florida*, made it very clear that the notice of alibi rule of Florida did not violate the defendant's Fifth Amendment right. Permitting the prosecution to use the deposition of the alibi witness improved the investigation of some critical facts that were essential for determining the guilt or innocence of the defendant. In addition, such evidence complied with due process and fair trial.

#### References

U. S. Supreme Court, *Sheppard v Maxwell*, 384 U. S. 333 (1966) . (1966, June 6). Retrieved from Justia US Supreme Court: <https://supreme.justia.com/cases/federal/us/384/333/case.html>

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