

Capital

[Lynch v. Arizona](#), 578 U.S. ____ (May 31, 2016). Where the State put the defendant's future dangerousness at issue and acknowledged that his only alternative sentence to death was life imprisonment without parole, the Arizona court erred by concluding that the defendant had no right to inform the jury of his parole ineligibility. Under *Simmons v. South Carolina*, 512 U. S. 154 (1994), and its progeny, where a capital defendant's future dangerousness is at issue, and the only sentencing alternative to death available to the jury is life imprisonment without possibility of parole, the Due Process Clause entitles the defendant to inform the jury of his parole ineligibility, either by a jury instruction or in arguments by counsel.

Post-Conviction

[Warden v. Lee](#), 578 U.S. ____ (May 31, 2016). The Ninth Circuit erred by concluding that the California "Dixon bar"—providing that a defendant procedurally defaults a claim raised for the first time on state collateral review if he could have raised it earlier on direct appeal—was inadequate to bar federal habeas review. Federal habeas courts generally refuse to hear claims defaulted in state court pursuant to an independent and adequate state procedural rule. State rules are "adequate" if they are firmly established and regularly followed. California's Dixon bar meets this standard.