

sideration of other objections to the complaint. Opinion by Justice Ginsburg, with whom Chief Justice Roberts and Justices Scalia, Breyer, Sotomayor, and Kagan joined. Justice Thomas filed a dissenting opinion in which Justices Kennedy and Alito joined, construing Skinner's complaint as one attacking the state's postconviction procedures, which must be brought in habeas.

*Sossamon v. Texas*, 2011 WL 1485252 (April 20, 2011) (No 08-1438). The Religious Land Use and Institutionalized Persons Act of 2000, 42 U.S.C. § 2000cc-1, provides a private cause of action for "appropriate relief" for institutionalized persons who claim that states and state agents have unduly restricted their rights to exercise their religion. Sossamon sued Texas and prison officials for in-

junctive and monetary relief, based on prison policies precluding prisoners on cell restriction from attending church services and barring use of the prison chapel for religious worship. The Supreme Court held that the acceptance by the state of federal funds does not waive the state's defense of sovereign immunity to such a suit for money damages. Apparently the prison abandoned both policies after the case was filed, mooted the claim for injunctive relief. Opinion for the court by Justice Thomas in which Chief Justice Roberts and Justices Scalia, Kennedy, Ginsburg, and Alito joined. Justice Sotomayor filed a dissenting opinion in which Justice Breyer joined, on the ground that "appropriate relief" in the statute includes money damages. Justice Kagan took no part in the consideration or decision of the case. ■



St. Thomas University School of Law (Miami Gardens, FL) won the 21st National Criminal Justice Trial Advocacy Competition, annually cosponsored by the ABA Criminal Justice Section and the John Marshall Law School, Chicago. Student competitors from 21 US law schools participated. Left to right: Ronald C. Smith, competition director; J. Vincent Aprile, Louisville, KY, and Stephen Komie, Chicago, evaluators; Hon. A.C. Cunningham, Cook County public defender and presiding judge of the championship round); St. Thomas University School of Law students Bryan Paschal (Best Advocate awardee), Joey McCall, Lincoln Atten, and William McHugh.