

*This opinion is nonprecedential except as provided by
Minn. R. Civ. App. P. 136.01, subd. 1(c).*

**STATE OF MINNESOTA
IN COURT OF APPEALS
A25-2057**

State of Minnesota,
Respondent,

vs.

Steven Eric Doan-Hanson,
Appellant.

**Filed August 3, 2026
Reversed and remanded
Reyes, Judge**

Isanti County District Court
File No. 30-CR-22-430

Keith Ellison, Attorney General, St. Paul, Minnesota; and

Jeffrey R. Edblad, Isanti County Attorney, Nicholas J. Colombo, Assistant County Attorney, Cambridge, Minnesota (for respondent)

Cathryn Middlebrook, Chief Appellate Public Defender, Erik I. Withall, Assistant Public Defender, St. Paul, Minnesota (for appellant)

Considered and decided by Reyes, Presiding Judge; Larkin, Judge; and Bratvold, Judge.

NONPRECEDENTIAL OPINION

REYES, Judge

Appellant argues that the district court (1) lacked subject-matter jurisdiction over his sentences at the time that it resentenced him and (2) abused its discretion by imposing

an excessive sentence. Because the district court lacked subject-matter jurisdiction, we reverse and remand for resentencing.

FACTS

Appellant Steven Eric Doan-Hanson challenges the district court's sentencing determinations after this court reversed and remanded for resentencing in *State v. Doan-Hanson*, No. A24-1214, 2025 WL 1924036, at *10 (Minn. App. July 14, 2025) (*Doan-Hanson I*). There, we concluded that “the aggregate 688-month sentence imposed by the district court was excessive when compared with other similar cases and exaggerates the criminality of Doan-Hanson’s conduct.” *Id.*

The parties did not stipulate to the immediate entry of judgment under Minnesota Rule of Civil Appellate Procedure 136.02. And neither party petitioned for review to the Minnesota Supreme Court.

Fifty-seven days after we filed *Doan-Hanson I*, the district court held a sentencing hearing and resentenced appellant to four consecutive 144-month sentences, for a total of 576 months in prison. It declined appellant’s requests for concurrent sentences and for a downward departure.

Approximately two weeks after resentencing, the clerk of the appellate courts entered final judgment in *Doan-Hanson I*.

This appeal follows.

DECISION

Appellant argues that the district court (1) lacked subject-matter jurisdiction to resentence him before the clerk of the appellate courts entered final judgment in *Doan-*

Hanson I and (2) abused its discretion by imposing an excessive sentence on remand that unfairly exaggerates the criminality of his conduct. Because we agree that the district court lacked subject-matter jurisdiction at the time of resentencing, but for different reasons, we decline to reach appellant’s second argument.

“Subject-matter jurisdiction refers to a court’s authority to hear the type of dispute at issue and to grant the type of relief sought.” *State v. Thompson*, 995 N.W.2d 415, 418 (Minn. App. 2023). District courts have subject-matter jurisdiction over sentencing in criminal cases. *See State v. Schnagl*, 859 N.W.2d 297, 301 (Minn. 2015). Whether subject-matter jurisdiction exists is a question of law that appellate courts review de novo. *Thompson*, 995 N.W.2d at 418. Challenges to subject-matter jurisdiction “can never be forfeited or waived.” *Reed v. State*, 793 N.W.2d 725, 731 (Minn. 2010) (quotation omitted).

However, the filing of an appeal generally “suspends the [district] court’s authority to make any order that affects the order or judgment appealed from.” Minn. R. Civ. App. P. 108.01, subd. 2; *see also* Minn. R. Crim. P. 29.01, subd. 2 (“To the extent applicable, the Minnesota Rules of Civil Appellate Procedure govern appellate procedure unless these rules direct otherwise.”). In the criminal-sentencing context, a sentence imposed in the absence of subject-matter jurisdiction is void. *See Vang v. State*, 788 N.W.2d 111, 117 (Minn. 2010) (“When the court lacks subject-matter jurisdiction over a proceeding at the time it imposes a sentence, the sentence is void.”).

With respect to decisions of the court of appeals, “[u]nless the parties stipulate to the immediate entry of judgment, the clerk of the appellate courts shall enter judgment

pursuant to the decision or order not less than 30 days after the filing of the decision or order.” Minn. R. Civ. App. P. 136.02. If a party to a criminal case wishes to petition for review to the Minnesota Supreme Court, it “must serve and file the petition for review within 30 days after the [Minnesota] Court of Appeals files its decision.” Minn. R. Crim. P. 29.04, subd. 2. However, “[f]or good cause,” an appellate judge may extend the time to serve and file a petition for review by up to 30 days. *Id.* Put differently, parties in an adult criminal case may have up to 60 days to petition for review to the Minnesota Supreme Court.¹

Here, the parties did not stipulate to the immediate entry of judgment. The district court resentenced appellant 57 days after we filed our opinion in *Doan-Hanson I*. At that time, the parties could still petition the supreme court for review. Accordingly, we conclude that the district court did not have the authority to resentence appellant and therefore lacked subject-matter jurisdiction over his resentencing proceeding. Because the

¹ The good-cause extension available in adult criminal appeals distinguishes this case from juvenile delinquency appeals, making the state’s reliance on a nonprecedential opinion in a juvenile delinquency appeal particularly unpersuasive. *See In re Welfare of T.D.B.*, No. A17-0913, 2018 WL 492641, at *3 (Minn. App. Jan. 22, 2018) (concluding that district court had jurisdiction to issue order “[b]ecause [it] followed this court’s instructions on remand[] and waited to act until after the 30-day period for the supreme court review had passed”); *see also* Minn. R. Civ. App. P. 136.01, subd. 1(c) (providing that nonprecedential opinions are persuasive, but not binding, authority). The rules applicable to juvenile delinquency appeals do not provide an extension to the 30-day deadline to petition for review. *See* Minn. R. Juv. Delinq. P. 21.01 (“Except as provided by these rules, Minnesota Rules of Civil Appellate Procedure shall govern appeals from juvenile court proceedings. . . . A party may petition to the Supreme Court of Minnesota for review pursuant to Minn. R. Civ. App. P. 117 or 118.”); Minn. R. Civ. App. P. 117, 118 (providing no extension to deadline to petition for review to the supreme court).

district court lacked subject-matter jurisdiction to resentence appellant, his new sentence is void. *See Vang*, 788 N.W.2d at 117.

We decline to address appellant’s exaggerated-criminality challenge to the void sentence. *See State v. Barthman*, 938 N.W.2d 257, 275 n.6 (Minn. 2020) (declining to consider exaggerated-criminality challenge to sentence because court remanded for resentencing). We reverse and remand to the district court for resentencing not inconsistent with this opinion as well as our prior opinion in *Doan-Hanson I*, 2025 WL 1924036, at *10, in which we concluded that an “aggregate 688-month sentence imposed by the district court was excessive when compared with other similar cases and exaggerates the criminality of Doan-Hanson’s conduct.”

Reversed and remanded.