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Editor's Note

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Editor's Note

In our Fall 2004 Issue, the JOURNAL included a Note analyzing *Cone v. Bell*, 359 F.3d 785 (6th Cir. 2004). See 1 TENN. J.L. & POL'Y 153 (2004). On January 24, 2005, the U.S. Supreme Court reversed the Sixth Circuit's decision in *Cone*. The Court held that the Tennessee Supreme Court's affirmance of a death sentence imposed based on the jury's finding that murders were "especially heinous, atrocious, or cruel" was not contrary to clearly established Supreme Court precedent. See *Bell v. Cone*, 125 S. Ct. 847 (2005).
