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Apr 16 2025

SC Court of Appeals

**THE STATE OF SOUTH CAROLINA
In the Court of Appeals**

Appellate Case No. 2024-001241

APPEAL FROM THE OCONEE COUNTY COURT OF COMMON PLEAS

Case No. 2024-CP-37-00451

Jason Michael Boyle.....Appellant,

v.

Danny Singleton, Probate Judge.....Respondent.

**RESPONSE TO APPELLANT'S
MOTION TO DISQUALIFY COUNSEL
AND CLARIFY PARTIES**

James W. Logan, Jr.
Post Office Box 259
Anderson, SC 29622
864-226-1910
864-226-1931 (fax)
logan@loganandjolly.com
Attorney for Respondent

Other Counsel of Record:
Plaintiff, Pro Se
Jason Boyle
750 Mourning Dove Lane
Seneca, SC 29678
Jasonboyle03@gmail.com

COMES NOW Danny Singleton, Probate Judge of Oconee County, Respondent in the above-entitled action, who hereby respectfully shows this Honorable Court the following:

ARGUMENT

Appellant seeks to have counsel for Respondent "disqualif[ied]" from representing his client, "to clarify that the State of South Carolina is the proper [R]espondent in these proceedings, and to impose sanctions" upon counsel for Respondent "for engaging in improper conduct."¹ (App.'s Mot. at 2)

As an initial matter, Respondent acknowledges this action involves the appeal of a criminal contempt conviction within the Probate Court of Oconee County. (*See* App.'s Mot. at 2) Thus, "the State is the adverse party and, therefore, is the respondent, because criminal contempt is an offense against the State." In re Martel, 444 S.C. 517, 520, 909 S.E.2d 402, 403 (2024). Accordingly, to the extent Appellant's Motion does not embrace such a request, Respondent is of the view this Honorable Court should substitute the State of South Carolina as the respondent in this action in place of Respondent. *Cf. id.*

As to Appellant's remaining contentions, these are entirely without merit. It is notable Appellant initiated his appeal to the Court of Common Pleas as an action with Respondent as the opposing party, (*see* Ex. A at 1), pursued said appeal in the same posture, (*see generally* Ex. B at 1), and continued his view of Respondent as the opposing party in both his Notice of Appeal and Amended Notice of Appeal before this Honorable Court. Thus, it is perfectly natural Respondent would have counsel in this action.

¹ While Appellant failed to paginate his Motion, Respondent's citations refer to what would be the proper form.

Further, it is clear counsel for Respondent owes Appellant no duty to advise Appellant regarding any of his flawed or mistaken views of the law, whether substantively or procedurally. Accordingly, there is no rational basis by which counsel for Respondent may be "disqualif[ied]" from representing Respondent, whether as a party to this action or otherwise, nor is there any evidence counsel for Respondent has "engage[d] in improper conduct by representing" Respondent. (Cf. App.'s Mot. at ¶¶ 10-11)

Moreover, Appellant contends counsel for Respondent "has been put on notice for engaging in the same conduct" in, as cited by Appellant, Nathan Chambers v. State of South Carolina, App. Case No. 2025-000276. (App.'s Mot. at ¶ 8) Counsel for Respondent is compelled to alert this Honorable Court he had no substantive involvement whatsoever in conjunction with the case referenced by Appellant. (Cf. id.) Additionally, while Appellant asserts this Honorable Court issued an Order on February 25, 2025, pertaining to Chambers, (*see id.*), despite diligent attempts to do so using Westlaw and reviewing the relevant Advance Sheets, counsel has been unable to locate any such Order by this Honorable Court.²

Therefore, in light of Appellant's Motion, Respondent respectfully contends 1) the State of South Carolina should be substituted in place of Respondent in this action; and 2) Appellant's Motion should be denied to the extent he seeks disqualification of and the imposition of sanctions against counsel for Respondent. Respondent expresses no opinion as to the remaining relief sought by Appellant. (*See* App.'s Mot. at 4)

² Appellant specifically asserts: "In that case, the South Carolina Court of Appeals issued an [O]rder dated February 25, 2025. . . ." (App.'s Mot. at ¶ 8)

Respectfully submitted,

s/James W. Logan, Jr.

James W. Logan, Jr. (SC Bar. #3385)
Post Office Box 259
Anderson, SC 29622
864-226-1910
864-226-1931 (fax)
logan@loganandjolly.com
Attorney for Respondent

This 16th day of April, 2025.

STATE OF SOUTH CAROLINA

COUNTY OF _____

IN THE COURT OF COMMON PLEAS

FILED OCONEE COUNTY, SC
MELISSA C. BURTON
CLERK OF COURT
Plaintiff(s)

CIVIL ACTION COVERSHEET

2024 JUN 14 P 5: 04

2024-CP-3700 451

2020 ES 3700 532

Jason Boyle
vs.
Judge Singleton
Pierce Estate?

Defendant(s)

Submitted By: _____
Address: _____

SC Bar #: _____
Telephone #: _____
Fax #: _____
Other: _____
E-mail: _____

NOTE: The coversheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for the use of the Clerk of Court for the purpose of docketing cases that are NOT E-Filed. It must be filled out completely, signed, and dated. A copy of this coversheet must be served on the defendant(s) along with the Summons and Complaint. This form is NOT required to be filed in E-Filed Cases.


DOCKETING INFORMATION (Check all that apply)

*If Action is Judgment/Settlement do not complete

- JURY TRIAL demanded in complaint. NON-JURY TRIAL demanded in complaint.
- This case is subject to ARBITRATION pursuant to the Court Annexed Alternative Dispute Resolution Rules.
- This case is subject to MEDIATION pursuant to the Court Annexed Alternative Dispute Resolution Rules.
- This case is exempt from ADR. (Certificate Attached)

NATURE OF ACTION (Check One Box Below)

- | | | | |
|---|---|--|---|
| <p>Contracts</p> <ul style="list-style-type: none"> <input type="checkbox"/> Constructions (100) <input type="checkbox"/> Debt Collection (110) <input type="checkbox"/> General (130) <input type="checkbox"/> Breach of Contract (140) <input type="checkbox"/> Fraud/Bad Faith (150) <input type="checkbox"/> Failure to Deliver/Warranty (160) <input type="checkbox"/> Employment Discrim (170) <input type="checkbox"/> Employment (180) <input type="checkbox"/> Other (199) _____ <p>Inmate Petitions</p> <ul style="list-style-type: none"> <input type="checkbox"/> PCR (500) <input type="checkbox"/> Mandamus (520) <input type="checkbox"/> Habeas Corpus (530) <input type="checkbox"/> Other (599) _____ <p>Special/Complex /Other</p> <ul style="list-style-type: none"> <input type="checkbox"/> Environmental (600) <input type="checkbox"/> Automobile Arb. (610) <input type="checkbox"/> Medical (620) <input type="checkbox"/> Other (699) _____ <input type="checkbox"/> Sexual Predator (510) <input type="checkbox"/> Permanent Restraining Order (680) <input type="checkbox"/> Interpleader (690) | <p>Torts - Professional Malpractice</p> <ul style="list-style-type: none"> <input type="checkbox"/> Dental Malpractice (200) <input type="checkbox"/> Legal Malpractice (210) <input type="checkbox"/> Medical Malpractice (220) Previous Notice of Intent Case #
20____-NI-____-_____ <input type="checkbox"/> Notice/ File Med Mal (230) <input type="checkbox"/> Other (299) _____ <p>Administrative Law/Relief</p> <ul style="list-style-type: none"> <input type="checkbox"/> Reinstate Drv. License (800) <input type="checkbox"/> Judicial Review (810) <input type="checkbox"/> Relief (820) <input type="checkbox"/> Permanent Injunction (830) <input type="checkbox"/> Forfeiture-Petition (840) <input type="checkbox"/> Forfeiture—Consent Order (850) <input type="checkbox"/> Other (899) _____ | <p>Torts - Personal Injury</p> <ul style="list-style-type: none"> <input type="checkbox"/> Conversion (310) <input type="checkbox"/> Motor Vehicle Accident (320) <input type="checkbox"/> Premises Liability (330) <input type="checkbox"/> Products Liability (340) <input type="checkbox"/> Personal Injury (350) <input type="checkbox"/> Wrongful Death (360) <input type="checkbox"/> Assault/Battery (370) <input type="checkbox"/> Slander/Libel (380) <input type="checkbox"/> Other (399) _____ <p>Judgments/Settlements</p> <ul style="list-style-type: none"> <input type="checkbox"/> Death Settlement (700) <input type="checkbox"/> Foreign Judgment (710) <input type="checkbox"/> Magistrate's Judgment (720) <input type="checkbox"/> Minor Settlement (730) <input type="checkbox"/> Transcript Judgment (740) <input type="checkbox"/> Lis Pendens (750) <input type="checkbox"/> Transfer of Structured Settlement Payment Rights Application (760) <input type="checkbox"/> Confession of Judgment (770) <input type="checkbox"/> Petition for Workers Compensation Settlement Approval (780) <input type="checkbox"/> Incapacitated Adult Settlement (790) <input type="checkbox"/> Other (799) _____ | <p>Real Property</p> <ul style="list-style-type: none"> <input type="checkbox"/> Claim & Delivery (400) <input type="checkbox"/> Condemnation (410) <input type="checkbox"/> Foreclosure (420) <input type="checkbox"/> Mechanic's Lien (430) <input type="checkbox"/> Partition (440) <input type="checkbox"/> Possession (450) <input type="checkbox"/> Building Code Violation (460) <input type="checkbox"/> Other (499) _____ <p>Appeals</p> <ul style="list-style-type: none"> <input type="checkbox"/> Arbitration (900) <input type="checkbox"/> Magistrate-Civil (910) <input type="checkbox"/> Magistrate-Criminal (920) <input type="checkbox"/> Municipal (930) <input checked="" type="checkbox"/> Probate Court (940) <input type="checkbox"/> SCDOT (950) <input type="checkbox"/> Worker's Comp (960) <input type="checkbox"/> Zoning Board (970) <input type="checkbox"/> Public Service Comm. (990) <input type="checkbox"/> Employment Security Comm (991) <input type="checkbox"/> Other (999) _____ |
|---|---|--|---|

Submitting Party Signature: 

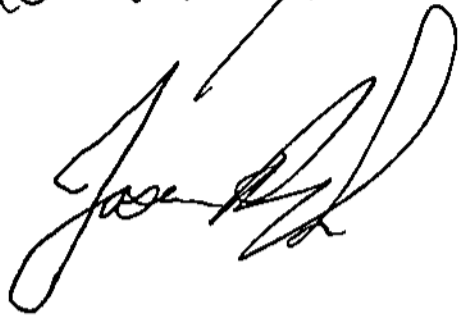
Date: 6/14/2024

I was incarcerated on May 29 to June 6th,
late in the day.

I was kept in solitary confinement
only allowed calls late in the night.

FILED OCEAN COUNTY, NJ
JULIENNE B. BURTON
CLERK OF COURT
2024 JUN 14 P 5:08

I lost a lot of money over this
and this is the last of my money.

Jason Boyke


FILED OCONEE COUNTY, SC
MELISSA C. BURTON
CLERK OF COURT

2024 JUN 14 P 5:10
THE STATE OF SOUTH CAROLINA
The Court of Common Pleas

APPEAL FROM OCONEE COUNTY
Probate Court
Hon. Danny Singleton, Probate Court Judge

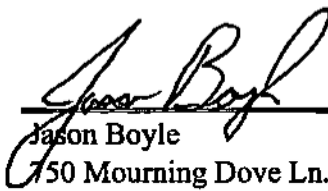
Case No. 2020ES3700532

In The Matter of: Doyle Elton Pierce..... Decedent,
Ex Rel. Jason Boyle Appellant.

NOTICE OF APPEAL

Jason Boyle appeals the order of the Hon. Danny Singleton that, *inter alia*, held the Appellant in direct contempt. This order was entered on 29th May, 2024. A copy of which was received by the Appellant on 6th June, 2024.

14th June, 2024
Seneca, South Carolina


Jason Boyle
750 Mourning Dove Ln.
Seneca, South Carolina 29678
864-245-3278
jasonboyle03@gmail.com
FOR THE APPELLANT

Other Counsel of Record:
Richard Hunt McDuff
SC Bar No. 76242
119 Professional Park Drive
Seneca, South Carolina 29678
864-882-2466

FILED OCONEE COUNTY, SC.
MELISSA C. BURTON
CLERK OF COURT
THE STATE OF SOUTH CAROLINA
In The Court of Common Pleas
2024 JUN 14 P 5:04

APPEAL FROM OCONEE COUNTY
Probate Court

Hon. Danny Singleton, Probate Court Judge

Case No. 2020ES3700532

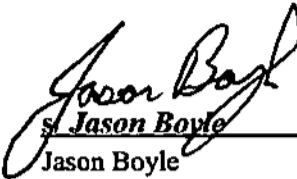
In The Matter of: Doyle Elton Pierce..... Decedent,

Ex Rel. Jason Boyle Appellant.

PROOF OF SERVICE

I Jason Boyle, do hereby certify that I have served the Notice of Appeal and the Order on appeal in the above captioned case upon opposing counsel and the lower Court by depositing such in the U.S. mail with proper postage affixed thereto, addressed to counsel's last known address. A curtesy copy has been provided electronically via email addressed to counsel's email address as indicated by the AIS.

14th June, 2024
Seneca, South Carolina


s/ Jason Boyle

Jason Boyle
750 Mourning Dove Ln.
Seneca, South Carolina 29678
864-245-3278
jasonboyle03@gmail.com
For the Appellant

Other Counsel of Record:
Richard Hunt McDuff
SC Bar No. 76242
119 Professional Park Drive
Seneca, South Carolina 29678
864-882-2466

THE STATE OF SOUTH CAROLINA
IN THE OCONEE COUNTY COURT OF COMMON PLEAS
APPEAL FROM THE PROBATE COURT
TENTH JUDICIAL CIRCUIT

FILED OCONEE COUNTY, SC
MELISSA C. BURTON
CLERK OF COURT
2024 JUL 31 P 1:39

The Order of Judge Danny Singleton

CASE NO: 2024-CP-3700451

JASON MICHAEL BOYLE-----Appellant,

V.

DANNY SINGLETON, "et al" -----Respondents

STATEMENT OF ISSUES ON APPEAL

1. Did the Probate Judge err when he accused the appellant, in an email to uninterested parties, of illegally offering legal advice to a citizen in the lobby of the probate court on October 24, 2023?
2. Did the probate court properly consider the appellant's right to free speech under the First Amendment on October 24, May 24 and May 29 in its accusations and/or orders?
3. Did the probate court err in exceeding its jurisdiction by criminally prosecuting the appellant for direct criminal contempt of a South Carolina Supreme Court Administrative Order (SCSC AO) on use Electronic Devices in Courthouses dated March 09, 2023?
4. Was the appellant properly informed of the administrative order, through service or notice, and/or any related restrictions before his actions on May 24 and/or May 29, 2024?
5. Did the probate court violate the appellant's constitutional rights by restricting his access to the probate lobby in emails and through requests to the Sheriff Deputies to have him removed?
6. Did the Probate Court err in its determination that Appellant committed direct criminal contempt of court?
7. Did the probate court err in denying the appellant's right to effective legal representation during the June 17, 2024, hearing?

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COMPUTER


no copies

8. Did Judge Singleton err in using the Probate Estate case number of the Doyle Pierce Estate in the two summonses for Rule to Show Cause?
9. Did the Probate Court err by not including descriptive details and clarity in court documents such as orders and/or summonses?
10. Did the Probate Court err by not including case numbers in court orders and documents?
11. Did the probate court improperly deny the appellant's requests for a continuance on June 17, 2024?
12. Did the probate court err by not considering or hearing Appellant's Motion to Dismiss?
13. Did the probate court err in not granting requests made in the Memorandum on the Motion to Dismiss such as the requests for Judge Singleton to recuse himself, appointment of a special prosecutor, and/or to provide a jury trial?
14. Did the probate court err by verbally dismissing Appellant's Motion to Dismiss without an order of the court, reduced in writing and recorded with the clerk of probate court?
15. Did the probate court err by not giving the appellant a fair opportunity to present his case and respond to the allegations against him?
16. Did the probate court err in leading the public defender to believe this contempt rose out of a civil matter by using Doyle Elton Pierce's estate case number?
17. Did the probate court err by not properly following legal procedures and standards in sending summons and sentencing the appellant to incarceration?
18. Did the probate court err by not posting the South Carolina Supreme Court Administrative Order (SCSC AO) regarding Electronic Devices in Courthouses dated March 09, 2023, as directed in the order itself?
19. Did the probate court fail to properly document and file orders related to the appellant's case, affecting the validity and enforceability of those orders?
20. Did the probate court err when Judge Singleton served as witness, prosecutor, investigator and judge, while acting as the Sua Sponte moving party?
21. Did Judge Singleton improperly testify to material facts from the bench?
22. Did Judge Singleton deprive appellant of his rights when he declined to be cross examined yet he was a material witness in Appellant's case.

23. Did Judge Singleton act out of judicial vindictiveness or personal bias against Appellant?
24. Did Judge Singleton err in bringing the Rule to Show Cause [RTSC] *Sua Sponte*, and then acting as the Judge?
25. Did the court err in having Judge Singleton call witnesses that were also his court clerks [Subordinates]?
26. Did Judge singleton err in preparing his own clerks as witnesses for trial?
27. Did Judge Singleton err by testifying from the bench?
28. Did Judge Singleton err by participating in *Ex Parte* conversations with any witnesses and/or the public defender?
29. Did the Probate Court err in not following procedure during the June 17 trial?
30. Did the probate court err in not holding a trial for the events of May 29, 2024?
31. Did the Probate Court err by sentencing Appellant twice for the same crime?
32. Did the Probate Court violate Appellants Miranda Rights?
33. Did the probate court err by including Richard Hunt McDuff improperly in the proceedings and/or *Ex Parte* conversations?
34. Did Judge Singleton err by investigating the facts of the case prior to trial?
35. Did Judge Singleton err by participating as a witness to material facts of the case and Judge?
36. Did the probate court err by allowing improper hearsay testimony despite objections?
37. Did Judge Singleton err by not maintaining the necessary calm required for ethical adjudication during his interactions with Appellant and during June 17, 2024, trial?
38. Did Judge Singleton err by holding animosity against Appellant due to his relationship with Mrs. Pierce, Appellant's public accusations that Judge Singleton is unintelligent and corrupt, and/or his willingness to assert his rights?
39. Was the South Carolina Supreme Court Administrative Order (SCSC AO) regarding Electronic Devices in Courthouses dated March 09, 2023, nullified upon conception?

40. Does the South Carolina Supreme Court Administrative Order (SCSC AO) regarding Electronic Devices in Courthouses dated March 09, 2023, violate the US Constitution amendment rights?
41. Does this South Carolina Supreme Court Administrative Order (SCSC AO) regarding Electronic Devices in Courthouses dated March 09, 2023, essentially act as law, in a violation of Articles I and III of the US constitution?
42. Were Appellant's rights violated when he was incarcerated without a case number or crime on the public record?
43. Were Appellant's 1st, 5th, 6th and/or 14th amendment rights violated?
44. Did the probate court err by not providing Appellant with a fair trial?
45. Did Judge Singleton err in requesting Appellant to destroy evidence on May 29, 2024?

Respectfully Submitted, this July 30, 2024.


DR. JASON MICHAEL BOYLE, Ph.D., Appellant
750 Mourning Dove Ln. Seneca, South Carolina 29678
jasonboyle03@gmail.com
(864) 245-3278

RECEIVED

Apr 16 2025

SC Court of Appeals

**THE STATE OF SOUTH CAROLINA
In the Court of Appeals**

Appellate Case No. 2024-001241

APPEAL FROM THE OCONEE COUNTY COURT OF COMMON PLEAS

Case No. 2024-CP-37-00451

Jason Michael Boyle.....Appellant,

v.

Danny Singleton, Probate Judge.....Respondent.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the Response to Appellant’s Motion to Disqualify Counsel and Clarify Parties was served via electronic email and first class mail, postage prepaid this 16th day of April, 2025, upon the following:

Jason Boyle
750 Mourning Dove Lane
Seneca, SC 29678
Jasonboyle03@gmail.com

s/James W. Logan, Jr.
James W. Logan, Jr. (SC Bar #3385)
Logan & Jolly, LLP
P.O. Box 259
Anderson, SC 29622
(864) 226-1910
logan@loganandjolly.com
Attorney for Respondent

Dated: 4-16-2025