



Jasonboyle03 me <jasonboyle03@gmail.com>

Documents

7 messages

Jasonboyle03 me <jasonboyle03@gmail.com>

Wed, Jul 24, 2024 at 3:15 PM

To: Kim Manley <manley@loganandjolly.com>, Jim Logan <logan@loganandjolly.com>

This is from Monday's filings. Do you need copies of the evidence?

I have a couple more filings to make in the coming days. I wll keep you updated as they are filed.

Thank you,
Jason

 **oppositionToRTSC.docx**
15K**Jasonboyle03 me** <jasonboyle03@gmail.com>

Wed, Jul 24, 2024 at 3:19 PM

To: Kim Manley <manley@loganandjolly.com>, Jim Logan <logan@loganandjolly.com>

I would like to add that if you agree to full discovery regarding the manufacture of the Exhibit B photo I will refrain from filing a summons for the digital equipment used, the full narrative of how the image was created, all the people involved, and how it came to the attention of Judge McIntosh.

Best,
Jason

[Quoted text hidden]

Jim Logan <logan@loganandjolly.com>

Wed, Jul 24, 2024 at 3:29 PM

To: Jasonboyle03 me <jasonboyle03@gmail.com>, Kim Manley <manley@loganandjolly.com>

I will need copies of anything you intend to present/use at the hearing(s)

James W. Logan, Jr.

Logan & Jolly, LLP
1805 North Boulevard

Post Office Box 259

Anderson, SC 29621

864-226-1910

864-226-1931 - Fax

logan@loganandjolly.com



LOGAN & JOLLY, LLP.
— ATTORNEYS AT LAW —

Please note that my e-mail address has changed to logan@loganandjolly.com and update your contact lists if necessary.

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From: Jasonboyle03 me <jasonboyle03@gmail.com>
Sent: Wednesday, July 24, 2024 3:16 PM
To: Kim Manley <manley@loganandjolly.com>; Jim Logan <logan@loganandjolly.com>
Subject: Documents

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

[Quoted text hidden]

Jasonboyle03 me <jasonboyle03@gmail.com>
To: Jim Logan <logan@loganandjolly.com>
Cc: Kim Manley <manley@loganandjolly.com>

Wed, Jul 24, 2024 at 3:37 PM

Same back at you.

[Quoted text hidden]

Kim Manley <manley@loganandjolly.com>
To: Jasonboyle03 me <jasonboyle03@gmail.com>, Jim Logan <logan@loganandjolly.com>

Fri, Aug 2, 2024 at 11:45 AM

Mr. Boyle:

Please see the attached Affidavit of Maggie Bonadies as well as the screenshots referenced to therein.

Thank you.

Kim Manley

Paralegal | Logan & Jolly, LLP

P.O. Box 259 | Anderson, SC 29622 | 864.226.1910



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From: Jasonboyle03 me <jasonboyle03@gmail.com>

Sent: Wednesday, July 24, 2024 3:19 PM

To: Kim Manley <manley@loganandjolly.com>; Jim Logan <logan@loganandjolly.com>

Subject: Re: Documents

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I would like to add that if you agree to full discovery regarding the manufacture of the Exhibit B photo I will refrain from filing a summons for the digital equipment used, the full narrative of how the image was created, all the people involved, and how it came to the attention of Judge McIntosh.

Best,

Jason

[Quoted text hidden]



Affidavit with Attachments.pdf

335K

Jasonboyle03 me <jasonboyle03@gmail.com>

To: Kim Manley <manley@loganandjolly.com>

Cc: Jim Logan <logan@loganandjolly.com>

Fri, Aug 2, 2024 at 3:22 PM

This makes no sense. If you look at the evidence submitted in my opposition to your motion for a RTSC, you will see the video was posted weeks ago.

It is a moot point nonetheless, for I was not served the order until after the Purported incident.

I will be filing a motion to strike the transcript for use of wrong case number. If you could just withdraw this evidence I will abstain from using the court time.

Best,
Jason

[Quoted text hidden]

Jasonboyle03 me <jasonboyle03@gmail.com>

Sat, Aug 3, 2024 at 8:24 AM

To: Kim Manley <manley@loganandjolly.com>

Cc: Jim Logan <logan@loganandjolly.com>

I appreciate the communication. The more we can settle on our own without the court involved I think the better.

I will be patient with the transcript. Clearly, there is an error related to case number, and I think we will work that out. If you have any ideas about how to solve that problem, let me know.

I would also like to know how the court became aware of this picture that Maggie took. How was it presented to McIntosh? When did he receive it? By what means?

Thank you. If there's anything you would like from me, I can be available, and get any documents.

Best regards,
Jason

[Quoted text hidden]



Jasonboyle03 me <jasonboyle03@gmail.com>

Jason Boyle v. Danny Singleton, et al

5 messages

Kim Manley <manley@loganandjolly.com>
To: Jasonboyle03 me <jasonboyle03@gmail.com>
Cc: Jim Logan <logan@loganandjolly.com>

Mon, Sep 9, 2024 at 4:32 PM

Mr. Boyle:

Please find attached Defendant Danny Singleton's Motion to Dismiss Appeal and Response to Plaintiff's Motion for Injunction which was filed today in the above referenced matter. Upon request, a hard copy will be mailed to you.

Thank you.

Kim Manley

Paralegal | Logan & Jolly, LLP

P.O. Box 259 | Anderson, SC 29622 | 864.226.1910



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3 attachments **Motion to Dismiss Appeal - filed.pdf**
127K

 **Motion to Dismiss Appeal Exhibits - filed.pdf**
634K

 **Response to Motion for Injunction - filed.pdf**
119K

Jasonboyle03 me <jasonboyle03@gmail.com>
To: Dorothy Pierce <dorothypierce84@gmail.com>

Mon, Sep 9, 2024 at 6:36 PM

----- Forwarded message -----

From: **Kim Manley** <manley@loganandjolly.com>
Date: Mon, Sep 9, 2024 at 4:33 PM
Subject: Jason Boyle v. Danny Singleton, et al
To: Jasonboyle03 me <jasonboyle03@gmail.com>
CC: Jim Logan <logan@loganandjolly.com>

Mr. Boyle:

Please find attached Defendant Danny Singleton's Motion to Dismiss Appeal and Response to Plaintiff's Motion for Injunction which was filed today in the above referenced matter. Upon request, a hard copy will be mailed to you.

Thank you.

Kim Manley




Paralegal | Logan & Jolly, LLP

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634K
-  **Response to Motion for Injunction - filed.pdf**
119K

Jasonboyle03 me <jasonboyle03@gmail.com>
To: Kim Manley <manley@loganandjolly.com>
Cc: Jim Logan <logan@loganandjolly.com>

Mon, Sep 9, 2024 at 6:45 PM

Make sure to send all evidence you plan to use in court. Thank you.

The fact that you have not submitted all of your evidence at this point is a problem. I am a working man, and I will be out of town till tomorrow. I believe we need to continuance in all matters.

On Mon, Sep 9, 2024 at 4:33 PM Kim Manley <manley@loganandjolly.com> wrote:

Mr. Boyle:

Please find attached Defendant Danny Singleton's Motion to Dismiss Appeal and Response to Plaintiff's Motion for Injunction which was filed today in the above referenced matter. Upon request, a hard copy will be mailed to you.

Thank you.

Kim Manley

Paralegal | Logan & Jolly, LLP

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Jasonboyle03 me <jasonboyle03@gmail.com>
To: Kim Manley <manley@loganandjolly.com>
Cc: Jim Logan <logan@loganandjolly.com>

Mon, Sep 9, 2024 at 7:53 PM

Also, please provide discovery on how you obtained the recordings from the jail. And provide me the transcripts immediately. Thank you.

On Mon, Sep 9, 2024 at 6:45 PM Jasonboyle03 me <jasonboyle03@gmail.com> wrote:
Make sure to send all evidence you plan to use in court. Thank you.

The fact that you have not submitted all of your evidence at this point is a problem. I am a working man, and I will be out of town till tomorrow. I believe we need to continuance in all matters.

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Kim Manley

Paralegal | Logan & Jolly, LLP

P.O. Box 259 | Anderson, SC 29622 | 864.226.1910



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*privilege, including the attorney-client privilege, that may attach to this communication.
Thank you for your cooperation.*

Jasonboyle03 me <jasonboyle03@gmail.com>
To: Dorothy Pierce <dorothypierce84@gmail.com>

Wed, Oct 30, 2024 at 8:04 PM

----- Forwarded message -----

From: **Jasonboyle03 me** <jasonboyle03@gmail.com>
Date: Mon, Sep 9, 2024 at 7:53 PM
Subject: Re: Jason Boyle v. Danny Singleton, et al
To: Kim Manley <manley@loganandjolly.com>
Cc: Jim Logan <logan@loganandjolly.com>

Also, please provide discovery on how you obtained the recordings from the jail. And provide me the transcripts immediately. Thank you.

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Kim Manley

Paralegal | Logan & Jolly, LLP

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Jasonboyle03 me <jasonboyle03@gmail.com>

Please provide transparency

5 messages

Jasonboyle03 me <jasonboyle03@gmail.com>

Thu, Aug 8, 2024 at 11:08 PM

To: Jim Logan <logan@loganandjolly.com>

Cc: Kim Manley <manley@loganandjolly.com>, "McIntosh, Lawton Law Clerk (Chase Kinsey)" <lmcintoshlc@sccourts.org>

Jim,

I am asking for clarity out of good faith. I have CC'ed Chase Kinsey on this communication only because this is the second tome I have emailed on this topic and have not received a complete response. I would like a detailed explanation to assure me that multiple *Ex Parte* conversations did not occur.

I have included my understanding of events. Please feel free to correct any misconceptions and include any missing content.

In the emergency release hearing of July 17, I was granted release with conditions. One of the conditions was a gag order. I did not receive a copy of the order upon my release. On July 22, at 11:35, I received an email from Chase Kinsey, Judge McIntosh's law clerk, written to Jim Logan, the attorney for Probate Judge Singleton, stating:

"Judge McIntosh has asked that I contact y'all to request that you prepare an order and rule to show cause for Mr. Boyle to appear in Court to determine whether he will be held in contempt for violating the gag order in this case. Thank you!"

I was not included in any conversations regarding any potential violation to this point, leading me to believe an *Ex Parte* conversation took place. The email sent by Mr. Kensey made a few things clear. The email did not include details of the proclaimed violation, so it is assumed that Mr. Chase and Logan's office are both aware of the contents of the accusation. It is also clear that this mutual understanding could not have been reached without an *Ex Parte* conversation.

After receiving this email, on July 22, I drove to the circuit court and received a copy of the gag order. After receiving the order, at 4:01 pm, I sent these questions regarding the order to Mr. Kinsey:

"When the order says no speaking publicly about this case, is that the appeals case, the probate case or both?"

I took down all of my social media posts that were up from before I was incarcerated. Was I required to do that?"

If I say I am out on a PR bond or that I have a hearing on July 31st, is that breaking the order?"

I was under the impression that a gag order meant the details of the case that are to be litigated. This order says do not discuss the case publicly. Does that mean don't even discuss the existence of the case?"

I have not received a response to these questions.

At 4:02 pm on July 22, Kim Manley, a paralegal for Jim Logan, sent a copy of a filed Motion for Rule to Show Cause to Judge McIntosh with a screenshot of a YouTube video as evidence. On July 23, I filed an objection to this Rule to Show Cause documenting evidence that the video was

posted prior to the gag order, the gag order did not mandate that I take down existing content, and that I had not received the order at the time of the proclaimed violation.

On August 2, Mrs. Manley sent an email with an affidavit from Maggie Bonadies stating she had taken a screen shot of my YouTube on her cell phone. This is not the same image used as evidence in the Motion for RTSC submitted. The screenshot produced in the affidavit is not the same screenshot as the one submitted by Logan as evidence. The affidavit does not state how the image submitted in the Motion for Rule to Show Cause was created, and the affidavit does not say how this evidence was received by Jim Logan and/or Judge McIntosh's office.

My concerns are 2-fold. One, If Mrs. Bonadies gave the screenshot to Oconee Probate Judge Danny Singleton, this would constitute an *Ex Parte* conversation. Mrs. Bonadies was a witness in the June 17 trial against me with Judge Singleton presiding. This case is currently pending appeal hearings. Secondly, the affidavit of Mrs. Bonadies' affidavit does not address where the screenshot submitted in the RTSC comes from. To whom did Mrs. Bonadies report her findings? How did McIntosh's office become aware of this proclaimed violation without any communication with me?

Discovery Questions:

1. How did Judge McIntosh's office become aware of these screen shots and accusations?
2. How did Mrs. Bonadies communicate her findings with Judge Singleton?
3. Did Mrs. Bonadies have an Ex Parte conversation with Judge Singleton?
4. Did Judge Singleton or Jim Logan and company have any Ex Parte conversations?
5. Provide the contents of all Ex Parte conversations.

Thank you,

Jason

Jim Logan <logan@loganandjolly.com>

Fri, Aug 9, 2024 at 9:34 AM

To: Jasonboyle03 me <jasonboyle03@gmail.com>

Cc: Kim Manley <manley@loganandjolly.com>, "McIntosh, Lawton Law Clerk (Chase Kinsey)" <Imcintoshlc@sccourts.org>

Jason Boyles,

I prefer to discuss these matters in open Court before the Judge at the hearing(s) that are to be scheduled to hear these matters.

James W. Logan, Jr.

Logan & Jolly, LLP
1805 North Boulevard

Post Office Box 259

Anderson, SC 29621

864-226-1910

864-226-1931 - Fax

logan@loganandjolly.com



Please note that my e-mail address has changed to logan@loganandjolly.com and update your contact lists if necessary.

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From: Jasonboyle03 me <jasonboyle03@gmail.com>
Sent: Thursday, August 8, 2024 11:08 PM
To: Jim Logan <logan@loganandjolly.com>
Cc: Kim Manley <manley@loganandjolly.com>; McIntosh, Lawton Law Clerk (Chase Kinsey) <Imcintoshlc@sccourts.org>
Subject: Please provide transparency

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[Quoted text hidden]

Jasonboyle03 me <jasonboyle03@gmail.com> Fri, Aug 9, 2024 at 10:07 AM
To: Jim Logan <logan@loganandjolly.com>
Cc: Kim Manley <manley@loganandjolly.com>, "McIntosh, Lawton Law Clerk (Chase Kinsey)" <Imcintoshlc@sccourts.org>

Mr Logan,

I prefer to have open discovery before court. So that we can make the most clear argument before the court. No surprises is better.

Best regards
Jason Boyle
[Quoted text hidden]

Jasonboyle03 me <jasonboyle03@gmail.com>
To: Jim Logan <logan@loganandjolly.com>

Fri, Aug 9, 2024 at 10:29 AM

I believe the law supports discovery. I will research later and submit a court filing for discovery and to strike the transcripts with the wrong case number.

Jason

On Fri, Aug 9, 2024 at 9:34 AM Jim Logan <logan@loganandjolly.com> wrote:
[Quoted text hidden]

Jasonboyle03 me <jasonboyle03@gmail.com>
To: Jim Logan <logan@loganandjolly.com>
Cc: Kim Manley <manley@loganandjolly.com>

Wed, Oct 30, 2024 at 10:37 AM

Jim,

I would like to continue this line of the conversation. If you could reply clearly to the above, I will not file a motion to compel.

Thank you,
Jason
[Quoted text hidden]



Jasonboyle03 me <jasonboyle03@gmail.com>

Probate record

4 messages

Jasonboyle03 me <jasonboyle03@gmail.com>

Sat, Sep 14, 2024 at 1:31 PM

To: Jim Logan <logan@loganandjolly.com>, Kim Manley <manley@loganandjolly.com>

Discovery requests.

I need full record from probate court.

I need full transparency on how contempt charge was investigated and how it was brought to McIntosh's attention.

I need the pictures from Singleton's phone taken in the below video.

Description of how witnesses were prepared for trial.

I need a copy of all phone calls from jail and explanation of how these call contents were discovered.

I hope we work well together. It is clear the judge McIntosh wants us to work together to resolve these issues without him. I have sent you several emails, and you do not reply. I have replied to every email you sent.

If I do not hear back from you by late this week, I will file a motion to compel answers to these discovery questions. I'm sure I will come up with more questions.

If you need anything from me, please ask. I believe transparency is our friend. I will provide with complete transparency anything you would like. I am hopeful you will reciprocate that gesture.

Thank you
Jason

Jasonboyle03 me <jasonboyle03@gmail.com>

Sat, Sep 14, 2024 at 1:39 PM

To: Jim Logan <logan@loganandjolly.com>, Kim Manley <manley@loganandjolly.com>

Forgot to attach video. Obviously, because of the appeals, my release order is not valid now. Nonetheless, if the release order was valid, Singleton clearly violates it in this video by approaching me during my protest. Singleton also initiated a conversation with me in the hallway, and then tried to accuse me of violating the order.

What is your stance on the pending appeal? Can we agree in writing that with the appeal pending? The order is stayed and the status quo is maintained? Can we just agree in writing here and now to follow South Carolina law?

<https://youtu.be/3C6HdGTQbY8?si=DRg7nO3cZBA2OhBY>

[Quoted text hidden]

Jasonboyle03 me <jasonboyle03@gmail.com>

Wed, Oct 30, 2024 at 8:04 PM

To: Dorothy Pierce <dorothypierce84@gmail.com>

[Quoted text hidden]

Jasonboyle03 me <jasonboyle03@gmail.com>

Wed, Oct 30, 2024 at 8:06 PM

To: Dorothy Pierce <dorothypierce84@gmail.com>

----- Forwarded message -----

From: **Jasonboyle03 me** <jasonboyle03@gmail.com>

Date: Sat, Sep 14, 2024 at 1:39 PM

Subject: Re: Probate record

To: Jim Logan <logan@loganandjolly.com>, Kim Manley <manley@loganandjolly.com>

[Quoted text hidden]



Jasonboyle03 me <jasonboyle03@gmail.com>

Question

3 messages

Jasonboyle03 me <jasonboyle03@gmail.com>

Tue, Sep 24, 2024 at 1:02 PM

To: "McIntosh, Lawton Law Clerk (Chase Kinsey)" <lmcintoshlc@sccourts.org>

Cc: Kim Manley <manley@loganandjolly.com>, Jim Logan <logan@loganandjolly.com>

Dear Judge McIntosh,

I am looking for an attorney to represent me in the hearing on November 14. The attorneys that I have Solicited are saying they've never heard of such a case like this, and are not sure about a criminal appeal being heard in the circuit court.

What I have been saying is that this was a criminal trial held in the probate court. The case number for the criminal trial is the same as the appeals case number. Judge Singleton was the moving party on the criminal contempt, so it's his name that appears in the appeal, even though it arose out of a civil court.

I was denied a public defender in the criminal case, because at that time it was deemed a civil case. It wasn't changed to a criminal trial until recently. And at that time, we are switching to reviewing the case, and the appeal, under criminal statutes? I am no longer eligible for a public defender, because this is an appeal.

Are we all in agreement with this?

It would be very helpful to have answers to these questions so that I can search for an attorney.

Best regards,
Jason

McIntosh, Lawton Law Clerk (Kjursten Collier) <lmcintoshlc@sccourts.org>

Tue, Sep 24, 2024 at 3:31 PM

To: Jasonboyle03 me <jasonboyle03@gmail.com>

Cc: Kim Manley <manley@loganandjolly.com>, Jim Logan <logan@loganandjolly.com>, "McIntosh, Lawton Secretary (Tammy Jennings)" <lmcintoshsc@sccourts.org>

Good afternoon,

From Judge McIntosh:

"I am not allowed to give legal advice. You can apply to the Public Defender's office to see if you qualify financially. You can pay your application fee of \$40 to the Clerk of Court's office and then take your receipt next door to the Public Defender's Office. You will be required to fill out a sworn financial statement and they will tell you whether or not you qualify. I do not know whether they will represent you on your appeal of the contempt ruling. I think they can tell you whether this is a criminal or civil matter."

Respectfully,

Kjursten Collier

Law Clerk to the

Honorable R. Lawton McIntosh

P.O. Box 8002

Anderson, SC 29622

Office: (864) 260-4059

lmcintoshlc@sccourts.org

From: Jasonboyle03 me <jasonboyle03@gmail.com>
Sent: Tuesday, September 24, 2024 1:03 PM
To: McIntosh, Lawton Law Clerk (Kjursten Collier) <lmcintoshlc@sccourts.org>
Cc: Kim Manley <manley@loganandjolly.com>; Jim Logan <logan@loganandjolly.com>
Subject: Question

***** EXTERNAL EMAIL:** This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. ***

[Quoted text hidden]

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---

**Jasonboyle03 me** <jasonboyle03@gmail.com> Tue, Sep 24, 2024 at 3:55 PM  
To: "McIntosh, Lawton Law Clerk (Kjursten Collier)" <lmcintoshlc@sccourts.org>  
Cc: Kim Manley <manley@loganandjolly.com>, Jim Logan <logan@loganandjolly.com>, "McIntosh, Lawton Secretary (Tammy Jennings)" <lmcintoshsc@sccourts.org>

Thank you for the reply. I do not feel I'm asking for legal advice. I'm asking for clarification on things judge McIntosh said from the bench, and in writing. In my pursuit for an attorney, I am discovering just how unconventional this case is.

Can you confirm that this is a criminal case, and it is being heard under criminal statutes, as a criminal appeal?

Can you confirm that the case number being used for the criminal case held in the probate court is now the appeals case number?

These are not Request for legal advice, they are clarification on the standing of the court.

Thank you,  
Jason

[Quoted text hidden]

**STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS**

**Case No.: 2024-001241**

**Jason M. Boyle, Ph.D., Appellant**

v.

**Danny Singleton, Probate Judge, Respondent**

**INITIAL BRIEF OF APPELLANT**

Appeal of Release Order of 10<sup>th</sup> Circuit Court issued on July 17, 2024, and Order of Contempt Issued on September 16, 2024.

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### **JURISDICTION**

This Court has jurisdiction under **S.C. Code Ann. § 14-8-200(a)(2)**, which grants the South Carolina Court of Appeals jurisdiction over appeals from the Court of Common Pleas. The order being appealed was entered on **July 17, 2024**, and the contempt order was entered on **September 16, 2024**. A Notice of Appeal was timely filed on **July 25, 2024**, invoking an automatic stay under **Rule 241, SCACR**.

## TABLE OF AUTHORITIES

### Cases

- **Charleston Cnty. Dep't of Soc. Servs. v. King**, 369 S.C. 96, 631 S.E.2d 239 (2006)
- **City of Rockford v. Grayned**, 408 U.S. 104 (1972)
- **Creech v. S.C. Pub. Serv. Auth.**, 397 S.C. 640, 726 S.E.2d 759 (2012)
- **Curlee v. Howle**, 277 S.C. 377, 287 S.E.2d 915 (1982)
- **District of Columbia v. Heller**, 554 U.S. 570 (2008)
- **Ex parte Jackson**, 381 S.C. 253, 672 S.E.2d 585 (2009)
- **Foggie v. Gen. Am. Life Ins. Co.**, 271 S.C. 138, 245 S.E.2d 604 (1978)
- **In re Brown**, 279 S.C. 116, 303 S.E.2d 677 (1983)
- **Lucas v. Rawl Family Ltd. P'ship**, 359 S.C. 505, 598 S.E.2d 712 (2004)
- **Mathews v. Eldridge**, 424 U.S. 319 (1976)
- **McDonald v. City of Chicago**, 561 U.S. 742 (2010)
- **Nebraska Press Ass'n v. Stuart**, 427 U.S. 539 (1976)
- **Saenz v. Roe**, 526 U.S. 489 (1999)
- **State v. Bevilacqua**, 316 S.C. 122, 447 S.E.2d 213 (1994)
- **State v. Dickey**, 394 S.C. 491, 716 S.E.2d 97 (2011)
- **Ward v. Rock Against Racism**, 491 U.S. 781 (1989)

### Statutes & Constitutional Provisions

- **South Carolina Constitution, Art. I, § 2** (Freedom of Speech)
- **South Carolina Constitution, Art. I, § 3** (Due Process)
- **South Carolina Constitution, Art. I, § 22** (Right to Assemble/Travel)
- **South Carolina Constitution, Art. V, § 5** (Judicial Rulemaking Authority)
- **S.C. Code Ann. § 14-1-200 et seq.** (General Provisions Concerning Courts)
- **S.C. Code Ann. § 14-5-320** (Circuit Court Contempt Powers)
- **S.C. Code Ann. §§ 14-5-340, 14-5-350** (Circuit Court Administration)
- **S.C. Code Ann. § 14-23-1010 et seq.** (Probate Court Powers)
- **S.C. Code Ann. §§ 16-23-20 et seq.** (Firearms Regulations)
- **S.C. Code Ann. §§ 17-15-10 et seq.** (Bail and Recognizances)
- **S.C. Code Ann. § 18-9-130 & § 18-1-50** (Appellate Stays)
- **S.C. Code Ann. § 18-9-170** (Enforcement of Judgments Pending Appeal)
- **S.C. Code Ann. § 15-53-10 et seq.** (Uniform Declaratory Judgments Act)

### Court Rules

- **Rule 241, SCACR** (Automatic Stay of Contested Orders)

## STANDARDS OF REVIEW

### 1. **Constitutional and Legal Questions: De Novo Review**

When an appeal raises constitutional issues—such as free speech restrictions under the First Amendment or due process claims—the appellate court reviews those questions **de novo**. See *State v. Dickey*, 394 S.C. 491, 493–94, 716 S.E.2d 97, 98 (2011). Under this standard, the reviewing court affords no deference to the lower court’s ruling and decides the legal issue anew.

### 2. **Contempt Orders: Abuse of Discretion, Subject to Legal Error Review**

In South Carolina, appellate courts generally review a trial court’s use of contempt powers for an **abuse of discretion**. See *In re Brown*, 279 S.C. 116, 119, 303 S.E.2d 677, 678 (1983). A finding of contempt will not be disturbed absent a clear showing the trial court abused its discretion. However, if the contempt ruling rests upon an error of law—such as misapplying constitutional principles or ignoring the automatic stay under Rule 241, SCACR—the appellate court will correct that legal error **de novo**. See *Ex parte Jackson*, 381 S.C. 253, 258, 672 S.E.2d 585, 588 (2009).

### 3. **Interpretation of Statutes and Court Rules: De Novo Review**

Questions involving the interpretation or application of statutes (e.g., S.C. Code Ann. § 17-15-10 et seq., § 14-23-1010 et seq.) or appellate court rules (e.g., Rule 241, SCACR) are likewise reviewed **de novo**. See *Creech v. S.C. Pub. Serv. Auth.*, 397 S.C. 640, 653, 726 S.E.2d 759, 766 (2012). Appellate courts construe statutes and court rules in light of their plain language and legislative intent, giving no deference to the lower court’s determinations on purely legal questions.

### 4. **Bond and Release Conditions: Abuse of Discretion, Informed by Constitutional Standards**

When a lower court imposes bond-like conditions or pretrial restrictions on liberty, the appellate court examines whether those conditions constitute an **abuse of discretion**. However, if the restrictions implicate fundamental rights or exceed statutory authority, the appellate court applies **de novo** review to the underlying constitutional and statutory interpretations. See *Curlee v. Howle*, 277 S.C. 377, 287 S.E.2d 915 (1982).

### 5. **Preservation of Issues and Procedural Compliance**

Finally, while standards of review define the lens through which each issue is examined, the appellate court will only consider arguments properly preserved at trial or fitting within recognized exceptions (e.g., subject-matter jurisdiction can be raised at any time). See *Lucas v. Rawl Family Ltd. P’ship*, 359 S.C. 505, 598 S.E.2d 712 (2004).

In summary, the Court reviews constitutional questions and questions of law **de novo**, while deferring to the trial court’s factual findings and discretionary rulings unless there is an **abuse of discretion** or error of law.

## STATEMENT OF ISSUES ON APPEAL

1. Did the lower court err in assuming jurisdiction over the contempt order issued against Appellant Jason Boyle on September 16, 2024, despite the matter already being under review by the South Carolina Court of Appeals?
2. Did the court violate the Appellant's First Amendment rights by restricting his ability to publicly discuss information that is already publicly available?
3. Did the court improperly restrict the Appellant's Second Amendment rights despite his lack of any criminal history and while the underlying criminal finding remains on appeal?
4. Did the court err in restricting the Appellant's right to travel by prohibiting him from leaving the state?
5. Did the court err in issuing an order that ambiguously referred to "this case" without specifying a case number or clearly identifying the case at issue?
6. Did the court err by issuing an order that is unconstitutionally overbroad and impermissibly vague?
7. Did the court err in treating the Appellant's release as if it were parole, rather than recognizing that he was released as a free man with no parole conditions?
8. Did the **Oconee County Court of Common Pleas** err in imposing a prohibition on alcohol consumption without justification, infringing on the Appellant's personal freedom and autonomy?
9. Did the **Circuit Court** err in prohibiting the Appellant from possessing weapons, violating his constitutional right to bear arms and jeopardizing his personal and family safety?
10. Did the **Circuit Court** err in imposing a travel restriction that unjustifiably prevents the Appellant from visiting family, fulfilling professional obligations, and exercising his fundamental right to movement?
11. Did the **Circuit Court** err by conditioning potential future sanctions on the Appellant's behavior, effectively coercing compliance with an unconstitutional order?
12. Did the **Circuit Court** err in accepting unverified and potentially manipulated evidence, including screenshots, as a basis for contempt?
13. Did the Oconee County Court of Common Pleas err by violating the Appellant's due process rights when it relied on ex parte communications and evidence in issuing the Rule to Show Cause that led to the contempt order on September 16, 2024?

## STATEMENT OF FACTS

### **Part 1 – Finding of Contempt in Probate Court**

**1.** On or about October 24, 2023, the Appellant visited the Oconee Probate Office to deliver a copy of the Notice of Appeal filed in the Circuit Court. This Notice of Appeal was submitted on behalf of the Appellant's fiancée, Dorothy Pierce, in connection with the ongoing estate case of Doyle Elton Pierce and specifically addressed the highly contested Settlement Order signed by Judge Singleton.

**a.** While waiting on the court, the Appellant overheard a conversation between Judge Green, the probate assistant Judge, and an older gentleman in the Lobby. Judge Green informed him of his right to get an attorney, and the Appellant interjected to inform him he had the right to act *Pro Se*.

**b.** Subsequently, Judge Singleton, who was not present for the interaction in the lobby, sent an email to the parties of the Pierce Estate case. The Appellant was not included in the email for the Appellant is not a party to this estate. The email directed to Mrs. Pierce stated:

**i.** Judge Singleton writes, *“Again, the appeal issue was part of the agreement. If it is your intent to appeal, you have every right to do so, however, it violates the agreement and it was stated in court that the appeals were to be removed”* .... He added that... *“A hearing will be scheduled soon to determine the status of the personal representative.”*

**ii.** Regarding the Appellant’s conversation with the gentleman, Judge Singleton writes, *“It also appears that you fiancé may have picked up the wrong documents. Further, your fiancé will no longer be allowed in the probate office or lobby area. He was here with your/his child waiting on documents and he took it upon himself to interrupt a judge in the lobby while she was speaking with someone on a separate estate issue. He was offering that person legal advice on what and what not to do and even encouraged him not to listen and come outside and speak to you, that you knew all about probate and you could help him. This is illegal and giving legal advise and acting as a non-licensed attorney. For this reason, he will no longer be able to enter the probate”*

**iii.** The Appellant asserts that the email sent to parties involved in the Estate of Doyle Elton Pierce was inappropriate, inaccurate, and defamatory.

**c.** The Appellant was never formally issued an order banning him from the probate lobby.

**i.** Shortly after the inappropriate and defamatory email was circulated, the Appellant returned to the lobby to file papers. Although he had heard about the email, he had not yet seen it. During this visit, Judge Singleton confronted the Appellant, stating that he was not allowed to be there and could not return. The Appellant explained his understanding of the law to Judge Singleton, asserting that he was within his rights to be there, and proceeded to file the papers.



7. On May 28, 2024, Officer Honea from the Oconee County Sheriff's Department (OCSD) arrived at the Appellant's residence to serve separate Rules To Show Cause (RTSC) to both the Appellant and Mrs. Pierce. Since the Appellant and his fiancée keep the gate to their residence locked, the officer drove through the woods to bypass the locked driveway gate, which prominently displayed a "No Trespassing" sign, following orders from Judge Singleton. Mrs. Pierce accepted her RTSC but refused to accept service on behalf of the Appellant.
8. On May 29, 2024, the Appellant returned to the probate court to obtain his Rule to Show Cause and requested to speak with Judge Singleton. Before meeting with the Appellant, Judge Singleton had already contacted the Oconee County Sheriff's Office to request the presence of deputies. Shortly thereafter, Officer Stokes and three other OCSD officers arrived. Judge Singleton then emerged from his chambers to speak with the Appellant. The Appellant recorded his interactions with the Judge in the probate court lobby, far from the Clerk's window, as he requested the summons for the RTSC.

  - a. Neither the probate court nor the OCSD were able to produce the RTSC document for the Appellant.
  - b. The Appellant agreed to leave despite his legal right to remain.
  - c. As the Appellant was walking out of the court lobby and halfway down the hall toward the exit, a probate court clerk followed him and informed him that Judge Singleton had instructed the Appellant to return to the probate lobby to speak with him.
  - d. In the lobby, Judge Singleton demanded that the Appellant delete his video evidence or be held in contempt of court. The Appellant declined to destroy his video evidence, leading Judge Singleton to order the OCSD to arrest him and hold him in jail for 10 days for contempt of court. It is important to note that on this day, the Appellant did not violate the alleged Supreme Court order regarding the use of electronic devices, as he did not record at the Clerk's window. Instead, he recorded his interactions with Judge Singleton in the lobby.
  - e. Judge Singleton's actions reveal several significant issues, including his preemptive involvement of law enforcement, which created an intimidating environment and demonstrated his intent to incarcerate the Appellant before establishing any guilt.
  - f. The Appellant's incarceration stemmed solely from his refusal to delete video evidence, not from any actual violation.
  - g. At no point during this interaction was I read my Miranda rights. I was not informed of my right to remain silent, my right to an attorney, or that anything I said could be used against me. This failure occurred despite the fact that I was clearly in a custodial setting and being interrogated about my actions related to the video recording. I was detained when Judge Singleton demanded my return to the court lobby. The interaction between Judge Singleton and me meets the criteria for custodial interrogation. I was not free to

leave, as evidenced by my immediate arrest and detention following my refusal to delete the video. The judge's demand and subsequent sentencing constituted an interrogation aimed at compelling an incriminating response from me.

- h.** The Appellant was entitled to a hearing or trial before being sentenced to 10 days in jail for refusing to delete his video evidence. However, instead of affording the Appellant this due process, Judge Singleton immediately ordered him to serve 10 days in jail and only then scheduled a hearing for June 5, 2024, after the sentence had already been imposed. This sequence of events highlights a significant violation of the Appellant's rights, as he was punished without the opportunity to defend himself or challenge the charges in a proper legal proceeding.
  - i.** Furthermore, by attempting to have the Appellant delete video evidence, the judge was violating the law by tampering with evidence. When the Appellant rightfully declined this illegal request, the judge, instead of upholding the law, sentenced him to jail. This action not only violated the Appellant's rights but also demonstrated a misuse of judicial authority by punishing the Appellant for refusing to comply with an unlawful demand.
  - j.** Later that day, on May 29, while incarcerated, the OCSD brought him a summons for RTSC scheduled for June 5<sup>th</sup>.
  - k.** The RTSC used the case number for the Doyle Pierce Estate case. It should be noted that appellant's case had nothing to do with the estate of Doyle Pierce and this is confirmed by Judge singleton during the June 17, 2024.
  - l.** The RTSC did not contain any times or dates of the purported violations.
  - m.** In the Rule to show cause, Judge singleton was the Moving Party.
- 9.** Subsequently, a sentencing order was further issued May 29, 2024, after appellant was already in jail.
- a.** This order did not contain a case number.
  - b.** The order used vague language to describe the activities that occurred.
  - c.** The order referred to both the events of May 24, 2024, and May 29, 2024.
  - d.** The order inaccurately claimed that the Appellant was aware of the South Carolina Supreme Court Administrative Order making rules on the use of electronic devices in the public and restricted space of the courthouse.
  - e.** The order charged appellant with Direct Criminal contempt.
- 10.** On June 5, 2024, after more than a 7-day water-only hunger strike, the Appellant was brought in an orange jumpsuit and shackles to the probate court for a criminal trial. The Appellant was represented by a man he knew as a lawyer. His fiancé had retained him at the last minute.
- a.** This hearing was video recorded by the probate court.
  - b.** In this hearing, Judge Singleton was the moving party, victim, prosecutor, main witness and the judge.
  - c.** Richard Hunt McDuff, an attorney on the Doyle Pierce Estate case, sat at the prosecutor's bench taking notes and making gestures.

- d. Judge Singleton testified from the bench as to the facts of the case.
  - e. Witnesses included Judge Green and two Oconee probate clerks. All of the witnesses called by Judge Singleton were his subordinates.
  - f. Judge Singleton testified from the bench defending himself against public allegations the Appellant made about his character and competency.
  - g. Judge Singleton held the Appellant in direct contempt of court and sentenced him to 60 days.
    - i. This order did not contain a case number.
    - ii. The order failed to specify the date of the alleged criminal infraction or provide any details regarding the actions deemed criminal or in violation of the South Carolina Supreme Court Administrative Order (SCSC AO).
    - iii. Judge Singleton later declared a mistrial in this matter.
11. On June 6, 2024, Judge Singleton issued an order stating the Appellant was represented by ineffective counsel in the RTSC hearing.
- a. This order had no case number.
  - b. This order immediately released the Appellant from detention.
12. On June 6, prior to appellant's release, the Appellant was issued a new RTSC for a trial date of June 17, 2024. The wording in this RTSC is identical to the one issued on June 5, 2024.
- a. The RTSC, again inappropriately used the Doyle Elton Pierce Estate Case number.
  - b. The RTSC had no date of incident.
  - c. The RTSC had no accusation of direct contempt.
13. A few days prior to June 12, 2024, the Appellant sent an email to the Probate Court Clerk requesting audio files from his hearing for transcription purposes, as required by the South Carolina Rules of Criminal and Civil Procedure, plus additional documents on his file to help him prepare for June 17, 2024, hearing. On or about June 12, 2024, the Clerk of the Probate Court informed the Appellant via email that his requested documents were ready. The Appellant promptly visited the probate court, entered the probate lobby to retrieve the requested records, make additional records requests, and speak with Judge Singleton about the upcoming criminal trial as the prosecutor and the moving party.
- a. Once the Appellant retrieved the records request, the Appellant realized there were many missing documents.
  - b. Once again, Judge Singleton called the Sheriff's Office and requested deputies to come to the probate court. It is important to note that it was the probate court clerk who had informed the Appellant to come and pick up his records. Despite this, the judge immediately called the police as soon as the Appellant arrived at the probate court lobby.
  - c. While waiting for Judge Singleton to arrive, Officer Stokes and another officer arrived to wait with him at the request of the probate court.
    - i. The Appellant was there with his one-year-old child and the child was playing with Officer Stokes.

- ii. The conversation and atmosphere were pleasant prior to the arrival of Judge Singleton.
  - d. Judge Singleton arrived shortly in the lobby thereafter in an aggravated state.
  - e. Judge Singleton was too impatient to answer the Appellant's questions and yet he is the moving party in the appellant's contempt case and the Prosecutor.
  - f. Judge Singleton asked the officers to remove me twice, they refused this request.
  - g. The Appellant stated that if threatened with arrest, the Appellant would leave.
  - h. The Appellant left of his own volition without receiving all the requested documents or making the additional records requests needed.
- 14.** On June 10, 2024, Appellant applied for a public defender to defend him against the criminal contempt charge levied against him by the judge who had already sentenced him to direct criminal contempt on May 29, 2024, and June 5, 2024.
- a. The public defender's office determined that the Appellant met the financial qualifications and that the case met the requirements for assignment of a public defender.
  - b. Appellant's application was approved after review, and appellant was advised to wait for a public defender to be assigned to him.
  - c. The Public Defenders Office (PDO) advised the Appellant to hand over the approved application form to the judge at the time of the hearing and request a continuance.
  - d. As of the morning of June 17, 2024, the Appellant had not heard back from the PDO.
- 15.** On June 17, 2024, at approximately 9:30 a.m., the Appellant filed a Motion to Dismiss, along with a 14-page Memorandum of Law that presented strong legal arguments supported by South Carolina state rules and case laws, as well as an approved application for a public defender.
- 16.** During the June 17, 2024, hearing, despite presenting the approved public defender form and not waiving his right to an attorney, the Appellant's request for a continuance pending the appointment of a public defender was denied. The judge proceeded with the trial, forcing the Appellant to represent himself without ensuring that he had adequate legal representation or that he had knowingly and voluntarily waived his right to counsel.
- a. During the first recess of the trial on June 17, 2024, Judge Singleton contacted the Public Defender's Office (PDO) regarding the Appellant's representation, following the Appellant's insistence on legal counsel and his submission of an approved public defender form, which should have warranted a continuance until a public defender was assigned.
  - b. Later in the trial, Mr. Abdalla, a public defender, and his paralegal arrived at the probate court. They met with Judge Singleton in the judge's chambers, ex parte, and subsequently testified under oath that the Public Defender's Office would not represent the Appellant because the case was civil in nature, not criminal.

- i. The reasoning behind this was that the summons used the Doyle Pierce Estate case number, a civil case in which the Appellant had no involvement.
  - ii. As a result, the Appellant was denied representation by the Public Defender's Office about an hour after the trial had already begun.
  - iii. Judge Singleton denied the Appellant's request for a continuance, claiming that the Appellant had been informed of his right to a lawyer and given sufficient time to secure one. However, this was inaccurate, as the Appellant had indeed secured a public defender, but due to the probate court's wrongful annexation of the case to the Estate of Doyle Elton Pierce, the Appellant was denied representation by the Public Defender's Office after the trial had already commenced.
- a. Appellant later learned that the public defender filed a document in the probate court stating they were unable to represent appellant due to the civil nature of the case. This was a reason to grant him a continuance to secure a lawyer, but instead appellant was deprived of legal counsel.
  - b. The appellant could not afford a lawyer, and yet the county Public Defender's office considers the case civil, even though appellant had already served a 10-day jail sentence for direct criminal contempt. The second jail sentence, which was 60 days, was on probate court file but was relieved due to ineffective counsel. The matter was in no way civil, and the judge knew he was treating the case as criminal contempt.
  - c. On June 17, 2024, at the criminal trial, the motion to dismiss was denied verbally from the bench without proper consideration or argument.
    - i. The details of the motion were never discussed in open court as appellant insisted on his right to counsel.
    - ii. The motion was never officially dismissed/denied with the judge's signature or properly recorded as required by law, rendering the order on the Motion to Dismiss null and void, as if no order had been issued.
    - iii. There was insufficient time between the filing of the document and the start of the trial for Judge Singleton to carefully consider the arguments of the motion, or even read the motion in its entirety for that matter.
    - iv. The memorandum on the motion to dismiss requested the following:
      - A jury trial.
      - Judge Singleton to recuse himself.
      - A special prosecutor.

**17.** During the trial, witnesses testified that the Appellant was not informed of the Supreme Court order during the first recording and that the Appellant did not use an electronic device at the clerks' window during the second recording, thus not violating the order.

18. After the trial, despite witness testimonies exonerating Appellant, Judge Singleton declared the Appellant guilty beyond a reasonable doubt of direct criminal contempt and resentenced him to an additional 50 days of incarceration, following the initial 10-day sentence.
  - i. Once again, this order contained no case number.
  - ii. The order also lacked specific dates of the events in question or any details regarding those events/ crimes.
19. In his oral conclusion and justification for the 50-day sentence, Judge Singleton indicated that since the Appellant had already served 10 days of a previous 60-day sentence, he was adding 50 days to complete the 60-day term. This action was inappropriate, as the original sentence had already been fully served, making the additional 50 days a case of double jeopardy.
20. The judge in this case acted as the moving party, the victim, the prosecutor, the primary witness and the judge, creating a clear conflict of interest and undermining the fairness of the proceedings. Throughout the trial, he continuously testified from the bench, and when the Appellant requested that he be sworn in to be cross examined after testifying from the bench, the judge blatantly refused.
21. The Probate Court issued several orders without creating a case number for the Appellant. As a result, the Appellant was sent to the Oconee County Detention Center without a case number, making it impossible to locate him in the South Carolina Department of Corrections system. This effectively rendered the Appellant an undocumented prisoner, as his name could be found in the Oconee County Department of Corrections, but a case number and the reasons for his incarceration were not listed.

## **Part 2 – RTSC in Circuit Court arising out of Release Order.**

22. On July 17, in an emergency hearing, the Appellant was released from jail after serving 30 days in the Oconee County Detention Center. The release order included a very broad and generic gag order that prohibited “speaking publically about this case”
  - a. The order did not specify if the case being referred to was the probate case number or the appeals case number.
  - b. The language used is generic and does not specify what about the case or cases should not be discussed.
  - c. On July 22, 2024, the appellant sent several follow up questions regarding the restrictions made by the release order to McIntosh’s office. After not hearing a response, the appellate replied on October 30<sup>th</sup>, 2024, seeking a response. Again, no reply.
23. On July 22 at 1:04 pm, the appellant received an email from the clerk of court, Chase Kinsey. In this email, Mr. Kinsey states “Judge McIntosh has asked that I contact y’all to request that you prepare an order and rule to show cause for Mr. Boyle to appear in Court”.

- a. At this point, the appellant had not been included in any of the Ex Parte conversations between Judge Singleton and his representative Jim Logan and Judge McIntosh and his office.
  - b. Email records show that the appellant is completely bewildered as to how the release order could have been violated.
24. On July 24, the appellant appealed the the release order.
25. On July 17, 2024, an emergency order was issued by the circuit court, granting the appellant a personal recognizance bond.
26. The release order imposed significant restrictions on the appellant's First and Second Amendment rights as well as limitations on freedom of travel, among other conditions.
27. On **July 22, 2024**, the appellant received notice from the law clerk of Judge McIntosh of the 10<sup>th</sup> circuit that requested Jim Logan, the attorney for Judge Singleton, produce a rule to show cause regarding a violation the appellant made of the gag order that is part of the release order.
  - a. The appellant was not involved in the **Ex Parte** conversations that resulted in Judge McIntosh requesting a Rule to Show Cause.
  - b. The contempt accusation is founded on **evidence produced through investigations carried out by Judge Singleton's clerk of court.**
  - c. The evidence submitted by Judge Singleton and his attorney Jim Logan contradicts what appears online regarding the same content.
28. On **July 25, 2024**, the Appellant **filed a notice of appeal** contesting the release order. This appeal triggered an **automatic stay** under **S.C. App. Ct. R. 241**, which remains in effect unless formally lifted.
29. On **August 12, 2024**, the Court of Appeals **denied the appeal** as interlocutory. However, the Appellant did not receive notice of this denial until **August 22, 2024**.
30. On **August 25, 2024**, the Appellant filed a **motion for reconsideration** with this Court, arguing that the restrictions imposed by the release order infringe upon the Appellant's substantial rights. This **motion remains pending** before the South Carolina Court of Appeals.

### **Part 3 – Finding of Contempt in Circuit Court with Order held in The Court of Appeals.**

31. Despite the pending motion, on **September 16, 2024**, Judge McIntosh of the 10th Circuit Court held the Appellant **in contempt of the release order** for an alleged violation that occurred on **September 8, 2024** while appellant's appeal is pending.
  - a. Document used to support finding was a first amendment protected publication that contained only published publicly available information.
  - b. The Order of July 17 restraining the Appellant "from speaking publicly about this case" is not only not in alignment with the US Constitution, it was on a judicial stay.

## STATEMENT OF CASE

### **Part 1: SCRCR Rule 501 Violations (Background).**

In the initial phase, the Appellant alleges multiple acts of misconduct by Judge Singleton, including defamation, retaliation for exercising free speech, improper exercise of criminal jurisdiction, failure to provide notice of an administrative order, abuse of judicial power, denial of counsel and due process, issuance of orders without case numbers, acting as both judge and prosecutor, engaging in ex parte communications, and exhibiting judicial vindictiveness. These collective failures undermined the fairness of the proceedings and violated core procedural safeguards.

### **Part 2: Appeal of the July 17, 2024 Release Order.**

The Appellant challenges the constitutionality of this order on several grounds. First, the gag provision is overbroad, vague, and operates as a prior restraint on speech, infringing the Appellant's First Amendment rights. Second, the order imposes unwarranted restrictions on firearm possession and travel, violating core constitutional protections without any factual basis. Finally, the Appellant argues that once he appealed on July 25, 2024, an automatic stay took effect under Rule 241, SCACR, rendering the order unenforceable and any subsequent contempt charges improper.

### **Part 3: Appeal of the September 16, 2024 Contempt Order.**

The Appellant contends that this contempt order is invalid because it relies on the stayed July 17 directive. Even if the underlying order were enforceable, the contempt proceeding infringed the Appellant's free speech rights by punishing lawful publication of publicly available documents. The Appellant also highlights due process violations, including lack of notice, ex parte communications, and the absence of criminal procedural safeguards—such as the right to counsel and proof beyond a reasonable doubt. He further argues that contempt power was misused to penalize protected speech and lawful criticism rather than address actual disobedience of a valid court directive.

## ARGUMENT

### PART ONE: BACKGROUND

**Specific Violations of SCRPC Rule 501 by Judge Danny Singleton are on appeal heard in the Circuit Court on January 31, 2024.**

1. Defamation and Unlawful Banning from Court
2. Retaliation for Exercising Free Speech
3. Improper Jurisdiction and Criminal Prosecution
4. Failure to Provide Notice of Administrative Order
5. Abuse of Judicial Power
6. Denial of Right to Counsel and Due Process
7. Issuance of Orders Without Case Numbers
8. Improper Role as Prosecutor and Judge
9. Ex Parte Communications and Witness Coaching
10. Judicial Vindictiveness and Bias

### PART TWO: APPEAL OF THE JULY 17, 2024 RELEASE ORDER

#### **1. The July 17 Order Imposes Unconstitutional Restrictions on Fundamental Rights**

##### **a. Overbroad and Vague Gag Provision**

The July 17, 2024 release order prohibits the Appellant from “speaking publicly about this case” without clarifying which case (probate or appeals) is implicated or what topics of discussion are barred. This broad language functions as a classic prior restraint on speech, contravening the First Amendment of the U.S. Constitution and Article I, § 2 of the South Carolina Constitution. A gag order must be narrowly tailored to serve a compelling state interest and must provide clear notice of what is prohibited. Here, the language is neither clear nor narrowly drawn, infringing on protected speech and failing constitutional scrutiny.

##### **b. Restrictions on Firearm Possession and Freedom of Travel**

Beyond the gag order, the Appellant was subjected to prohibitions on firearm possession, alcohol consumption, and travel outside the state—despite never being placed on formal probation. Such sweeping conditions implicate fundamental constitutional rights under the Second Amendment (firearms) and the right to travel (federal and state constitutional protections). The court provided no findings demonstrating a need for these bond-like restrictions, rendering them an unconstitutional burden on liberty.

##### **c. Unclear Basis for Bond-Like Conditions on a Released “Free Man”**

Although styled a “release order,” the July 17 directive imposed punitive constraints that resemble probation without formally placing the Appellant on probation. Pretrial or post-

sentencing conditions must have a clear statutory or factual basis; here, the record lacks any justification. Consequently, the court effectively punished the Appellant without the due process safeguards ordinarily required for criminal or probationary sanctions.

## **2. The Automatic Stay Under Rule 241, SCACR, Rendered the July 17 Order Unenforceable**

### **a. Filing of the Appeal Triggered Stay**

On July 25, 2024, the Appellant appealed the July 17 release order, automatically staying its enforcement under **Rule 241, SCACR**. The Court of Appeals denied the appeal on August 12, 2024, but the Appellant did not receive notice of that denial until August 22. On August 25, 2024, he filed a timely motion for reconsideration based on substantial rights. Under Rule 241, the stay remained in effect unless formally lifted by the court—a step that never occurred.

### **b. Continued Enforcement Despite the Stay**

Despite the pending motion for reconsideration and the resulting stay, the lower court and opposing parties continued treating the July 17 order as operative. They ultimately used it to charge the Appellant with contempt on September 8, 2024—when the order was plainly stayed. This disregard for the Rule 241 stay subverts fundamental principles of appellate jurisdiction. Once a notice of appeal is served (and the stay is triggered), the trial court may not enforce or modify the appealed order without express appellate authorization. Any contempt founded on a stayed order is, by definition, invalid.

## **3. The July 17 Order Violates Due Process**

### **a. Lack of Notice or Hearing on Conditions**

The record shows no meaningful hearing or opportunity for the Appellant to contest the broad gag order or the severe restrictions on his liberty. Due process requires that a litigant receive notice and a fair chance to be heard before being subjected to conditions that substantially curtail constitutional rights.

### **b. Ambiguous Language and Unanswered Inquiries**

The Appellant twice sought clarification from Judge McIntosh's office regarding the scope of the gag provision but never received a response. This ambiguity makes it impossible for the Appellant to conform his conduct to the order, effectively inviting arbitrary or discriminatory enforcement. Such vagueness also offends due process requirements under both the U.S. and South Carolina Constitutions.

## **PART THREE: APPEAL OF THE SEPTEMBER 16, 2024 CONTEMPT ORDER**

### **1. The Contempt Order Is Invalid Because the Underlying July 17 Order Was Stayed**

#### **a. No Valid Underlying Order to Violate**

The July 17 order had no legal force at the time of the alleged contempt (September 8, 2024) because it was stayed under Rule 241. An invalid or stayed order cannot provide the basis for a contempt finding; courts cannot punish a party for disobedience of an unenforceable directive.

## **b. Improper Basis for Contempt**

Even if the lower court believed the July 17 order to be in effect, it was wrong as a matter of law. A contempt ruling predicated on a stayed and unconstitutional order is inherently void. The lower court acted without jurisdiction to enforce a directive that had been suspended by the pending appeal and motion for reconsideration.

### **2. The September 16 Contempt Finding Violates Free Speech Protections**

#### **a. Protected Speech, Public Records**

The Appellant’s alleged contempt stems from a September 8 publication referencing publicly available court documents. Punishing the truthful dissemination of public information contravenes First Amendment principles and Article I, § 2 of the South Carolina Constitution, which protect the right to speak and publish freely.

#### **b. Prior Restraint and Overbreadth**

Even if the July 17 order were somehow valid, it amounts to a prior restraint—a judicial command that prohibits speech before it occurs. Courts presume such restraints unconstitutional unless narrowly tailored and supported by compelling evidence of immediate harm. Here, neither requirement was met. Restricting the publication of already public documents is the epitome of overbroad censorship.

### **3. Due Process Violations in the Contempt Proceeding**

#### **a. Lack of Meaningful Opportunity to Defend**

During the September 16 hearing, Judge McIntosh announced that sentencing would occur at the conclusion and warned the Appellant against “misbehavior,” effectively chilling any defense. The Appellant was given no genuine chance to present evidence, question witnesses, or refute the alleged violation. Such a summary approach fails the procedural safeguards required in criminal contempt proceedings (notice, right to counsel, opportunity to prepare a defense).

#### **b. Ex Parte Communications and Investigations**

The record indicates ex parte consultations took place between Judge McIntosh’s office, counsel for Judge Singleton, and the probate clerk. These communications formed the basis of the contempt charge without the Appellant’s knowledge or participation, undermining neutrality and fairness. Due process bars judicial officers from investigating or prosecuting the very contempt issue they adjudicate.

### **4. Judicial Misuse of Contempt Powers**

#### **a. Contempt as Punishment for Protected Conduct**

Contempt proceedings may not be weaponized to punish lawful criticism of a judge or dissemination of publicly available information. The record strongly suggests the Appellant’s speech criticizing the probate court became the actual target of these contempt charges—a constitutionally impermissible use of judicial power.

**b. No Evidentiary Hearing Compliant with Criminal Contempt Standards**

Criminal contempt carries the possibility of incarceration, and thus procedural safeguards akin to criminal prosecutions (e.g., notice, proof beyond a reasonable doubt, right to counsel) must apply. The September 16 order was issued in summary fashion, without adhering to these safeguards, rendering the contempt finding unenforceable.

## LEGAL AUTHORITY

### PART TWO: APPEAL OF THE JULY 17, 2024 RELEASE ORDER

#### I. Unconstitutional Restrictions on Fundamental Rights

##### 1. Overbreadth and Vagueness (Gag Provision / Prior Restraint)

###### ▪ Case Law

- *Nebraska Press Ass'n v. Stuart*, 427 U.S. 539, 558–59 (1976)
  - Gag orders imposing prior restraints on speech carry a heavy presumption against constitutional validity.
- *Ward v. Rock Against Racism*, 491 U.S. 781 (1989)
  - The three-prong test holds that a time, place, and manner restriction on speech is constitutional if it is **content-neutral, narrowly tailored** to serve a significant government interest, and **leaves open ample alternative channels for communication**.
- *City of Rockford v. Grayned*, 408 U.S. 104 (1972)
  - Orders must not be so vague that a person of ordinary intelligence must guess at their meaning.

###### ▪ Rules & Statutes

- **South Carolina Constitution, Art. I, § 2**
  - Explicitly protects freedom of speech, potentially more broadly than the federal constitution.
- **S.C. Code Ann. § 15-53-10, et seq. (Uniform Declaratory Judgments Act)**
  - Permits courts to declare rights and address the constitutionality/scope of an order.

##### 2. Restrictions on Firearm Possession, Alcohol Use, and Travel

###### ▪ Case Law

- *District of Columbia v. Heller*, 554 U.S. 570 (2008)
  - Recognizes an individual right to bear arms; any restriction requires a clear, lawful basis.
- *Saenz v. Roe*, 526 U.S. 489 (1999)
  - Protects the fundamental right to travel; restrictions must meet heightened scrutiny if they impinge on that right.

###### ▪ Rules & Statutes

- **S.C. Code Ann. § 16-23-20, et seq. (Firearms)**
  - Outlines lawful/unlawful firearm possession; any judicial limit must have a solid legal basis.
- **S.C. Code Ann. § 17-15-10, et seq. (Bail and Recognizances)**
  - Governs conditions on release; imposing “probation-like” terms without due process may be improper.

- **South Carolina Constitution, Art. I, § 3 (Due Process) and Art. I, § 22 (Right to Assemble/Travel)**
  - Generally require a legitimate basis and procedural safeguards for restricting travel and liberty.

### **3. Unclear Basis for “Bond-Like” Conditions on a Released Individual**

- **Case Law**
  - *Curlee v. Howle*, 277 S.C. 377, 287 S.E.2d 915 (1982)
    - Due process requires notice and a fair hearing whenever an individual’s liberty is significantly restricted.
- **Rules & Statutes**
  - **S.C. Code Ann. §§ 17-15-10, 17-15-20**
    - A court must articulate a basis for imposing bail/bond conditions, ensuring they comply with due process.

## **II. The Automatic Stay Under Rule 241, SCACR, Rendered the July 17 Order Unenforceable**

- **Case Law**
  - *Foggie v. Gen. Am. Life Ins. Co.*, 271 S.C. 138, 245 S.E.2d 604 (1978)
    - Upon notice of appeal, the lower court generally loses jurisdiction unless the stay is lifted.
- **Rules & Statutes**
  - **Rule 241, SCACR**
    - Filing an appeal triggers an automatic stay of the contested order unless explicitly lifted.
  - **S.C. Code Ann. §§ 18-9-130 & 18-1-50**
    - Provide general provisions for appeals and stays, read in tandem with Rule 241.
  - **South Carolina Constitution, Art. V, § 5**
    - Confers rulemaking authority on the Supreme Court, giving SCACR binding force.

## **III. The July 17 Order Violates Due Process**

### **1. Lack of Notice or Hearing on Conditions**

- **Case Law**
  - *Mathews v. Eldridge*, 424 U.S. 319 (1976)
    - Individuals must receive notice and a fair hearing before significant deprivations of liberty/property.
  - *In re Brown*, 279 S.C. 116, 303 S.E.2d 677 (1983)
    - Emphasizes due process requirements in contempt or quasi-criminal proceedings.
- **Rules & Statutes**
  - **South Carolina Constitution, Art. I, § 3**
    - Guarantees due process in civil and criminal contexts.

- **S.C. Code Ann. § 14-23-1010, et seq. (Probate Court Powers)**
  - Implies notice/hearing requirements for actions affecting significant rights; any quasi-criminal imposition must conform to due process.
- **S.C. Code Ann. § 14-1-200, et seq. (General Provisions Concerning Courts)**
  - Courts must adhere to procedural rules when exercising their inherent powers.

## 2. Ambiguity and Failure to Respond to Clarification Requests

### ▪ Case Law

- *City of Rockford v. Grayned*, 408 U.S. 104 (1972)
  - A vague directive violates due process by failing to provide fair notice of prohibited conduct.
- *Charleston Cnty. Dep't of Soc. Servs. v. King*, 369 S.C. 96, 631 S.E.2d 239 (2006)
  - Underscores the necessity of clarity and fundamental fairness.

## PART THREE: APPEAL OF THE SEPTEMBER 16, 2024 CONTEMPT ORDER

### 1. The Contempt Order Is Invalid Because the Underlying July 17 Order Was Stayed

#### ▪ Case Law

- *Foggie v. Gen. Am. Life Ins. Co.*, 271 S.C. 138, 245 S.E.2d 604 (1978)
  - The lower court is divested of jurisdiction once an appeal is perfected, absent a formal lift of the stay.

#### ▪ Rules & Statutes

- **S.C. Code Ann. § 18-9-170**
  - Contemplates halting enforcement of judgments once an appeal is taken, unless specifically authorized.
- **Rule 241, SCACR**
  - Directly controls automatic stays; no contempt should be based on an appealed order that remains stayed.

### 2. The September 16 Contempt Finding Violates Free Speech Protections

#### ▪ Case Law

- *Nebraska Press Ass'n v. Stuart*, 427 U.S. 539 (1976)
  - Gag orders/ prior restraints are presumptively unconstitutional.
- *Ward v. Rock Against Racism*, 491 U.S. 781 (1989)
  - The three-prong test holds that a time, place, and manner restriction on speech is constitutional if it is **content-neutral, narrowly tailored** to serve a significant government interest, and **leaves open ample alternative channels for communication.**

#### ▪ Rules & Statutes

- **South Carolina Constitution, Art. I, § 2**
  - Protects free speech at the state level; strict scrutiny applies to prior restraints.
- **S.C. Code Ann. § 15-53-10, et seq. (Uniform Declaratory Judgments Act)**
  - Could be used to declare the gag provision void for overbreadth or vagueness.

### 3. Due Process Violations in the Contempt Proceeding

#### ▪ Case Law

- *In re Brown*, 279 S.C. 116, 303 S.E.2d 677 (1983)
  - Criminal contempt proceedings must include notice, an opportunity to defend, and other safeguards.
- *Curlee v. Howle*, 277 S.C. 377, 287 S.E.2d 915 (1982)
  - Even in contempt cases, respondents are entitled to present evidence and be heard.

#### ▪ Rules & Statutes

- **S.C. Code Ann. § 14-5-320**
  - Grants circuit judges contempt powers but mandates they be exercised consistent with due process.
- **S.C. Code Ann. § 14-23-1010, et seq.**
  - Limits probate court powers; if a probate judge's criminal contempt proceeding transfers to circuit court, compliance with due process is still mandatory.

### 4. Judicial Misuse of Contempt Powers

#### ▪ Case Law

- *State v. Bevilacqua*, 316 S.C. 122, 447 S.E.2d 213 (1994)
  - Distinguishes civil from criminal contempt; criminal contempt demands procedural safeguards.
- *Ex parte Jackson*, 381 S.C. 253, 672 S.E.2d 585 (2009)
  - Cautions that contempt power must be used sparingly and within due process parameters.

#### ▪ Rules & Statutes

- **S.C. Code Ann. § 14-1-200, et seq.**
  - Provides general court administration authority; even so, due process is non-negotiable in contempt.
- **S.C. Code Ann. §§ 14-5-340, 14-5-350**
  - Discuss administrative and procedural powers of circuit courts; any contempt order must follow procedural norms.

## APPLICATION TO FACTS

**1. Did the Oconee County Court of Common Pleas err in assuming jurisdiction over the contempt order issued against Appellant Jason Boyle on September 16, 2024, despite the matter already being under review by the South Carolina Court of Appeals?**

Yes. Under Rule 241, SCACR, the filing of an appeal automatically stays the enforcement of the contested order unless the appellate court lifts the stay. The July 17, 2024, release order was under appeal, with a motion for reconsideration pending, thus rendering the lower court's enforcement and subsequent contempt ruling void. The trial court lacked jurisdiction to proceed with contempt while the appeal was active.

**2. Did the court violate the Appellant's First Amendment rights by restricting his ability to publicly discuss information that is already publicly available?**

Yes. The gag order imposed in the July 17, 2024, release order was an unconstitutional prior restraint, prohibiting the Appellant from discussing a case of public concern. Under *Nebraska Press Ass'n v. Stuart*, 427 U.S. 539 (1976), prior restraints on speech are presumptively unconstitutional. The court imposed a blanket restriction on the Appellant's speech without a compelling state interest or narrow tailoring.

**3. Did the court improperly restrict the Appellant's Second Amendment rights despite his lack of any criminal history and while the underlying criminal finding remains on appeal?**

Yes. The release order's prohibition on weapon possession violates the Appellant's Second Amendment rights under *District of Columbia v. Heller*, 554 U.S. 570 (2008). The order was imposed without findings of necessity, making it an arbitrary restriction on a fundamental constitutional right.

**4. Did the court err in restricting the Appellant's right to travel by prohibiting him from leaving the state?**

Yes. The right to interstate travel is fundamental under *Saenz v. Roe*, 526 U.S. 489 (1999). The trial court failed to justify why a travel restriction was necessary, imposing an unreasonable and unconstitutional limitation on the Appellant's freedom of movement.

**5. Did the court err in issuing an order that ambiguously referred to "this case" without specifying a case number or clearly identifying the case at issue?**

Yes. The release order's vague reference to "this case" lacked specificity, making it unenforceable under *City of Rockford v. Grayned*, 408 U.S. 104 (1972). A legally valid court order must provide clear notice of its scope to prevent arbitrary enforcement.

**6. Did the court err by issuing an order that is unconstitutionally overbroad and impermissibly vague?**

Yes. The gag order's prohibition on discussing "this case" was overly broad and vague, failing to meet the *Ward v. Rock Against Racism*, 491 U.S. 781 (1989) test for narrowly tailored speech restrictions. The order chilled lawful speech and created an impermissible restraint on expression.

**7. Did the court err in treating the Appellant's release as if it were parole, rather than recognizing that he was released as a free man with no parole conditions?**

Yes. The release order imposed probation-like conditions (e.g., restrictions on travel, firearm possession, and speech) without a statutory basis. The Appellant was not on parole or probation, making these restrictions improper under *Curlee v. Howle*, 277 S.C. 377, 287 S.E.2d 915 (1982).

**8. Did the Oconee County Court of Common Pleas err in imposing a prohibition on alcohol consumption without justification, infringing on the Appellant's personal freedom and autonomy?**

Yes. The court's restriction on alcohol consumption lacked any legal or factual basis. Such a condition cannot be arbitrarily imposed on an individual who is not on probation or parole. This unjustified restriction violated the Appellant's substantive due process rights.

**9. Did the Circuit Court err in prohibiting the Appellant from possessing weapons, violating his constitutional right to bear arms and jeopardizing his personal and family safety?**

Yes. The restriction on firearm possession lacked any justification or legal foundation. Under *District of Columbia v. Heller*, firearm restrictions must be narrowly tailored to a legitimate government interest, which was absent here.

**10. Did the Circuit Court err in imposing a travel restriction that unjustifiably prevents the Appellant from visiting family, fulfilling professional obligations, and exercising his fundamental right to movement?**

Yes. The restriction on interstate travel was not supported by any legal rationale and violated *Saenz v. Roe*, which protects the right to travel freely between states.

**11. Did the Circuit Court err by conditioning potential future sanctions on the Appellant's behavior, effectively coercing compliance with an unconstitutional order?**

Yes. The court's warning that further violations could result in additional sanctions improperly pressured the Appellant into compliance with an unconstitutional order. Judicial coercion of this nature violates *Curlee v. Howle*, which mandates that judicial orders must comply with due process.

**12. Did the Circuit Court err in accepting unverified and potentially manipulated evidence, including screenshots, as a basis for contempt?**

Yes. The contempt ruling relied on screenshots of alleged online postings without authentication. Courts must ensure evidence meets admissibility standards under Rule 901, SCRE, and the failure to verify the authenticity of this evidence rendered the ruling improper.

**13. Did the Oconee County Court of Common Pleas err by violating the Appellant's due process rights when it relied on ex parte communications and evidence in issuing the Rule to Show Cause that led to the contempt order on September 16, 2024?**

Yes. The contempt proceeding was tainted by ex parte communications between the trial judge and opposing counsel, violating due process. Under *In re Brown*, 279 S.C. 116 (1983), contempt proceedings must be fair, neutral, and free from improper judicial influence.

## REQUEST FOR RELIEF

WHEREFORE, the Appellant respectfully requests that this Honorable Court:

1. **Reverse the July 17, 2024 Order** in its entirety, finding that it unlawfully restricts the Appellant's fundamental rights without due process, is impermissibly vague and overbroad, and was improperly enforced despite the automatic stay under Rule 241, SCACR;
2. **Vacate the September 16, 2024 Contempt Order**, holding it void for lack of jurisdiction, unconstitutional restrictions on protected speech, and failure to observe due process safeguards;
3. **Remand** this matter to the lower court, if necessary, with specific instructions to conform any further proceedings to the constitutional and statutory requirements detailed herein; and
4. **Grant such other and further relief** as this Court deems just and proper under the circumstances.

Respectfully submitted,

Respectfully Submitted, this February 3, 2025.

A handwritten signature in blue ink that reads "Jason Boyle". The signature is written in a cursive style and is positioned above a horizontal line.

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

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

Order of Honorable Judge Lewton McIntosh

**APPELLATE CASE NO: 2024-001241**

JASON MICHAEL BOYLE----- Appellant,

V.

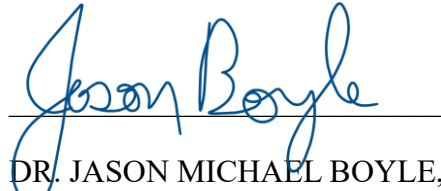
DANNY SINGLETON, "et al" -----Respondents

**PROOF OF SERVICE**

I hereby certify that on this February 3, 2025, a copy of the Initial Brief of Appellant and Designation of Matter was delivered to the following parties:

1. Jim Logan: [logan@loganandjolly.com](mailto:logan@loganandjolly.com)  
1805 N Boulevard, Anderson, SC. 29621
2. Oconee County Detention Center: [jchapman@oconeelaw.com](mailto:jchapman@oconeelaw.com)  
300 S Church St, Walhalla, SC 29691
3. Oconee County Sheriff's Department: [mcrenshaw@oconeelaw.com](mailto:mcrenshaw@oconeelaw.com)  
300 S Church St, Walhalla, SC 29691
4. Oconee County Administrator: [abrock@oconeesc.com](mailto:abrock@oconeesc.com)  
415 S. Pine St. Walhalla, SC 29691

Respectfully Submitted, this February 3, 2025.



DR. JASON MICHAEL BOYLE, Ph.D., Appellant.  
750 Mourning Dove Ln. Seneca, South Carolina 29678  
[jasonboyle03@gmail.com](mailto:jasonboyle03@gmail.com)

IN THE STATE OF SOUTH CAROLINA  
IN THE COURTS OF APPEALS  
APPEAL FROM THE OCONEE COUNTY COURT OF COMMON PLEAS  
TENTH JUDICIAL CIRCUIT  
Order of Honorable Judge Lewton McIntosh

**APPELLATE CASE NO: 2024-001241**

JASON MICHAEL BOYLE----- Appellant,

V.

DANNY SINGLETON, “et al” -----Respondents

**MOTION TO AMEND NOTICE OF APPEAL**

COMES NOW the Appellant, Dr. Jason Michael Boyle, and respectfully moves this Honorable Court to amend the Notice of Appeal filed in this case to include the contempt order issued on September 16, 2024, by Judge Lewton McIntosh. The following grounds support this motion.

**GROUND FOR THE MOTION**

1. **Relevance of the Contempt Order:** The contempt order issued on September 16, 2024, is directly connected to the issues under appeal, as it relates to the enforcement of the gag order imposed as part of the "Order of Release" issued on July 17, 2024. Both the order and the subsequent contempt are intertwined, and it is crucial that the contempt order is reviewed in conjunction with the original appeal to ensure a comprehensive resolution of all issues at hand.
2. **Jurisdictional Deficiencies:** When the contempt order was issued, the "Order of Release" was already under appeal, meaning the lower court no longer had jurisdiction to enforce the gag order or hold the Appellant in contempt. Furthermore, the Appellant did not post any content on YouTube on July 19, 2024, as alleged in the contempt proceedings, rendering the factual basis for the contempt finding incorrect.
3. **Improper Ex Parte Communications:** Attorney Jim Logan, representing Judge Danny Singleton, engaged in improper ex parte communication with Judge Lewton McIntosh, leading to the issuance of the Rule to Show Cause. The Appellant was not given the

opportunity to defend against these allegations before the contempt proceedings were initiated, violating fundamental principles of due process. This improper communication occurred while the original order was under appellate review, further indicating the lower court exceeded its jurisdiction.

4. **Preservation of Appellant's Rights:** Amending the notice of appeal to include the September 16, 2024, contempt order is essential to preserve the Appellant's rights. Failure to include this recent order could expose the Appellant to enforcement actions based on an improperly issued contempt finding, thus prejudicing his legal standing.
5. **Judicial Efficiency:** Reviewing the "Order of Release" and the subsequent contempt order in a single appeal promotes judicial efficiency and prevents piecemeal litigation. Both matters arise from the same legal proceedings, and consolidating them within this appeal will avoid conflicting rulings and repetitive litigation.
6. **Timeliness of the Motion:** This motion is timely filed, as it comes immediately following the issuance of the contempt order on September 16, 2024, and is within the permissible timeframe for amending the notice of appeal under the South Carolina Appellate Court Rules.

## ARGUMENTS

### **I. The Gag Order Was Stayed Pending Appeal and Was Therefore Unenforceable:**

A. **Filing of the Appeal Stayed the Enforcement of the Gag Order:** Under South Carolina law, the filing of a notice of appeal operates as a stay of the judgment or order being appealed, particularly when the order affects substantial rights. See Rule 241(a), SCACR. The gag order, which restricts the Appellant's First Amendment rights, qualifies as such an order. Thus, the gag order was automatically stayed upon the filing of the appeal, rendering its enforcement improper during this period.

B. **Lack of Jurisdiction to Enforce the Gag Order During Appeal:** Once an appeal is filed, the lower court is divested of jurisdiction over matters involved in the appeal. By enforcing the gag order and holding the Appellant in contempt, the lower court acted without jurisdiction, and its contempt order is void.

### **II. There Is No Evidence That Appellant Violated the Gag Order Before the Appeal:**

**A. The Alleged Video Was Posted Before the Gag Order Was Issued:** Respondents claim the Appellant posted a video on July 19, 2024, in violation of the gag order. However, YouTube records show that the video in question was posted on June 19, 2024, before both the issuance and the Appellant's receipt of the gag order on July 22, 2024.

**B. The Evidence Presented by Respondents Is Misleading:** The Respondents' evidence, a low-resolution screenshot, inaccurately reflects the actual posting date. Verifiable records from YouTube confirm the video was posted prior to the gag order, undermining the basis for the contempt finding.

### **III. The Contempt Finding Based on the September 8, 2024 Article Is Invalid:**

**A. The Gag Order Was Stayed When the Article Was Published:** The article published by the Appellant on September 8, 2024, occurred after the appeal was filed and during the stay of the gag order. As such, the publication cannot constitute a violation of the stayed gag order.

**B. The Contempt Finding Infringes on Appellant's First Amendment Rights:** Even if the gag order were enforceable, penalizing the Appellant for the article would violate his First Amendment rights. Prior restraints on speech are presumptively unconstitutional, and the gag order's enforcement in this context is an overreach.

### **IV. The Court's Actions Constitute an Abuse of Discretion:**

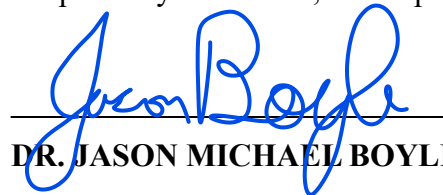
By enforcing a stayed gag order and relying on incorrect evidence, the lower court abused its discretion. The contempt order lacks evidentiary support and is based on legal error, which necessitates its reversal.

### **PRAYER FOR RELIEF**

WHEREFORE, the Appellant, Dr. Jason Michael Boyle, respectfully requests that this Honorable Court grant the following relief:

1. **Amendment of Notice of Appeal:** Allow the Appellant to amend the notice of appeal to include the order of contempt issued by Judge Lewton McIntosh on September 16, 2024.
2. **Any Other Relief:** Grant any other relief that the Court deems just and proper.

Respectfully Submitted, this September 21, 2024.



**DR. JASON MICHAEL BOYLE, Ph.D., Appellant**

750 Mourning Dove Ln.

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Phone: (864) 245-3278

IN THE STATE OF SOUTH CAROLINA  
IN THE COURTS OF APPEALS  
APPEAL FROM THE OCONEE COUNTY COURT OF COMMON PLEAS  
TENTH JUDICIAL CIRCUIT  
Order of Honorable Judge Lewton McIntosh

**APPELLATE CASE NO: 2024-001241**

JASON MICHAEL BOYLE----- Appellant,

V.

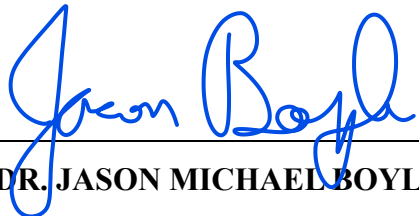
DANNY SINGLETON, “et al” -----Respondents

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Motion to Amend Notice of Appeal was served upon the following parties by email, on this 21<sup>st</sup> day of September 2024:

1. **Jim Logan:** logan@loganandjolly.com  
1805 N Boulevard, Anderson, SC. 29621
2. **Oconee County Detention Center:** jchapman@oconeelaw.com  
300 S Church St, Walhalla, SC 29691
3. **Oconee County Sheriff’s Department:** mcrenshaw@oconeelaw.com  
300 S Church St, Walhalla, SC 29691
4. **Oconee County Administrator:** abrock@oconeesc.com  
415 S. Pine St. Walhalla, SC 29691

Respectfully Submitted, this 21<sup>st</sup> day of September 2024.



**DR. JASON MICHAEL BOYLE, Ph.D., Appellant**

750 Mourning Dove Ln.  
Seneca, South Carolina 29678  
Email: jasonboyle03@gmail.com

**STATE OF SOUTH CAROLINA**  
**IN THE COURT OF APPEALS**

**Case No.: 2024-001241**

**Jason M. Boyle, Ph.D.,**  
**Appellant**

v.

**Danny Singleton, Probate Judge,**  
**Respondent**

**MOTION FOR CLARIFICATION UNDER S.C. APP. CT. R. 240**

COMES NOW, the Appellant, **Jason M. Boyle, Ph.D.**, pro se, and respectfully submits this Motion for Clarification pursuant to **S.C. App. Ct. R. 240** of the South Carolina Appellate Court Rules. The Appellant requests that this Court clarify the scope of the automatic stay imposed by the appeal of the **July 17, 2024, emergency release order**, as well as the limits of the circuit court's jurisdiction to enforce the contested order. In support of this motion, the Appellant states the following:

**FACTUAL BACKGROUND**

1. On July 17, 2024, an emergency order was issued by the circuit court, granting the appellant a personal recognizance bond.
2. The release order, however, imposed significant restrictions on the appellant's First and Second Amendment rights as well as limitations on freedom of travel, among other conditions.

3. On **July 25, 2024**, the Appellant **filed a notice of appeal** contesting the release order. This appeal triggered an **automatic stay** under **S.C. App. Ct. R. 241**, which remains in effect unless formally lifted.
4. On **August 12, 2024**, the Court of Appeals **denied the appeal** as interlocutory. However, the Appellant did not receive notice of this denial until **August 22, 2024**.
5. On **August 25, 2024**, the Appellant filed a **motion for reconsideration** with this Court, arguing that the restrictions imposed by the release order infringe upon the Appellant's substantial rights. This **motion remains pending** before the South Carolina Court of Appeals.
6. Despite the pending motion, on **September 16, 2024**, Judge McIntosh of the 10th Circuit Court held the Appellant **in contempt of the release order** for an alleged violation that occurred on **September 8, 2024** while appellant's appeal is pending.

### **ARGUMENT**

The Appellant contends that the circuit court does not have jurisdiction to enforce the **July 17, 2024, release order** while the appeal is pending. **S.C. App. Ct. R. 241** establishes that the filing of a notice of appeal results in an **automatic stay** of the appealed order and any relief granted therein. The following provisions of Rule 241 are directly applicable:

**“The service of a notice of appeal in a civil matter acts to automatically stay matters decided in the order, judgment, decree, or decision on appeal, and to automatically stay the relief ordered in the appealed order, judgment, or decree or decision.”**

This provision makes clear that the filing of the notice of appeal triggered an **automatic stay** of the relief ordered on the July 17, 2024, release order.

**Accordingly, “This automatic stay continues in effect for the duration of the appeal unless lifted by order of the lower court, the administrative tribunal, appellate court, or judge or justice of the appellate court.”**

No such order lifting the stay has been issued in this case, and the **automatic stay remains in place.**

**“The effect of the granting of a supersedeas is to suspend or stay the matters decided in the order, judgment, decree, or decision on appeal and, where a prior order or decision was in effect at the time the appealed order was filed, to revive the terms of the prior order.”**

This reinforces that the parties must be returned to the **status quo** prior to the appealed order.

**“The lower court or administrative tribunal retains jurisdiction over matters not affected by the appeal, including the authority to enforce any matters not stayed by the appeal.”**

As the restrictions imposed by the July 17 order are directly subject to the appeal, the court **does not have jurisdiction to enforce** them.

Accordingly, any enforcement of the release order, including the **September 16 contempt ruling**, is **outside the jurisdiction** of the circuit court and violates the stay under Rule 241.

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## **RELIEF REQUESTED**

The Appellant respectfully requests that the **South Carolina Court of Appeals**:

1. **Clarify** that the **automatic stay under Rule 241** applies to the July 17, 2024, release order.
2. **Instruct the 10th Circuit Court** that it **lacks jurisdiction** to enforce the release order or hold the Appellant in contempt while the appeal is pending.
3. Confirm that the **status quo prior to the release order** must be maintained, and the **restrictions imposed by the order are not enforceable** at this time.

---

## **CONCLUSION**

For the foregoing reasons, the Appellant requests that this Court grant the relief requested and **clarify the scope of the automatic stay and the limits on the circuit court's jurisdiction.**

Respectfully submitted,

Respectfully Submitted, this October 10, 2024.

A handwritten signature in blue ink that reads "Jason Boyle". The signature is written in a cursive style and is positioned above a horizontal line.

DR. JASON MICHAEL BOYLE, Ph.D., Appellant  
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jasonboyle03@gmail.com  
(864) 245-3278

IN THE STATE OF SOUTH CAROLINA,

IN THE COURTS OF APPEALS

APPEAL FROM THE OCONEE COUNTY COURT OF COMMON PLEAS

TENTH JUDICIAL CIRCUIT

Order of Honorable Judge Lewton McIntosh

**APPELLATE CASE NO: 2024-001241**

JASON MICHAEL BOYLE----- Appellant,

V.

DANNY SINGLETON, “et al” -----Respondents

**PROOF OF SERVICE**

I hereby certify that on this October 30, 2024, a copy of the Motion for Clarification was delivered to the following parties:

1. Jim Logan: logan@loganandjolly.com  
1805 N Boulevard, Anderson, SC. 29621
2. Oconee County Detention Center: jchapman@oconeelaw.com  
300 S Church St, Walhalla, SC 29691
3. Oconee County Sheriff’s Department: mcrenshaw@oconeelaw.com  
300 S Church St, Walhalla, SC 29691
4. Oconee County Administrator: abrock@oconeesc.com  
415 S. Pine St. Walhalla, SC 29691

Respectfully Submitted, this October 30, 2024.



DR JASON MICHAEL BOYLE, Ph.D., Appellant.  
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jasonboyle03@gmail.com

|                         |   |                                |
|-------------------------|---|--------------------------------|
| STATE OF SOUTH CAROLINA | ) | IN THE COURT OF COMMON PLEAS   |
|                         | ) |                                |
| COUNTY OF OCONEE        | ) | CASE NO: 2024-CP-37-00451      |
|                         | ) |                                |
| Jason Michael Boyle,    | ) |                                |
|                         | ) |                                |
| Plaintiff,              | ) | <b>DEFENDANT’S RESPONSE TO</b> |
|                         | ) | <b>PLAINTIFF’S MOTION FOR</b>  |
| v.                      | ) | <b>INJUNCTION</b>              |
|                         | ) |                                |
| Danny Singleton, et al, | ) |                                |
|                         | ) |                                |
| <u>    Defendant.</u>   | ) |                                |

As an initial matter, it must first be pointed out that Jason Boyle is not “currently incarcerated in the Oconee County Jail” but has been released from jail so this issue raised in this Motion is moot. Second, to the extent he includes in his Statement of Fact issues allegedly surrounding the Order of May 29, 2024, those Appellant issues must be excluded from any consideration of this Motion. Finally, to the extent there are any unique issues raised in this Motion for Injunction, they are part of any filed Appeal as opposed to being part of an “Emergency Motion” and, thus, should now be dismissed in its entirety.

The Defendants Motion for Order and Rule to Show Cause is an appropriate Motion to be heard by this Court for the reasons stated in said Motion, i.e., the Violation(s) by the the Order of Release/Discharge issued by this Court on July 17, 2024 and subsequent information that will be presented to the Court at a hearing, including, but not limited to, a transcript of a telephone call between Jason Boyle and Dorothy Pierce while he was incarcerated at the Oconee County Detention Center as well as other public statements/documents in violation of the Court’s Order of July 17, 2024.

Respectfully submitted,

s/James W. Logan, Jr.  
James W. Logan, Jr. (SC Bar #3385)  
Post Office Box 259  
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864-226-1910  
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Attorney for Defendant

September 9, 2024

THE STATE OF SOUTH CAROLINA  
IN THE OCONEE COUNTY COURT OF COMMON PLEAS  
APPEAL FROM THE PROBATE COURT  
TENTH JUDICIAL CIRCUIT  
The Order of Judge Danny Singleton  
**CASE NO: 2024-CP-3700451**

JASON MICHAEL BOYLE----- Appellant,

V.

DANNY SINGLETON, “et al” -----Respondents

**MOTION FOR SANCTIONS AGAINST JUDGE DANNY SINGLETON**

COMES NOW, Jason Michael Boyle, Appellant, and submits this Motion for Sanctions against Judge Danny Singleton. This motion is not a mere request for procedural rectification—it is a demand for accountability in the face of severe and undeniable judicial misconduct that has violated the very core of the legal principles that uphold our justice system.

**I. Factual Background**

**1. Flagrant Judicial Overreach:**

Judge Danny Singleton’s actions in this case go beyond the pale of acceptable judicial conduct—they constitute an outright abuse of power. Judge Singleton enforced the South Carolina Supreme Court Administrative Order dated March 9, 2023, which was never properly served or posted as required. The order explicitly mandates that it "shall" be posted on the courthouse doors—a mandate that Judge Singleton flagrantly ignored. This failure to post the order, as required, led directly to my illegal incarceration without any knowledge or notice of the alleged violations. Judge Singleton’s disregard for this fundamental requirement obliterated any semblance of due process.

## **2. Jurisdictional Usurpation:**

Judge Singleton did not stop at enforcing an unserved and unposted order; he dragged the Oconee County Probate Court into criminal territory where it had no jurisdiction. Probate courts in South Carolina are confined to estate matters—they have no authority over criminal contempt proceedings. Judge Singleton’s actions represent a gross violation of jurisdictional boundaries, making a mockery of the legal system.

## **3. Legal Farce in Case Numbers:**

Judge Singleton’s judicial malpractice is further highlighted by his use of the Doyle Pierce estate case number for the Rule to Show Cause (RTSC)—a blatant misapplication given that the contempt charges had nothing to do with that estate. Worse still, the three sentencing orders that followed had no case numbers at all—a procedural blunder so severe it borders on legal farce. I was detained for 40 days under orders that lacked even the most basic legal requirement—a case number—undermining due process entirely. Judge Singleton himself admitted in open court, not once, but twice, that this case had nothing to do with the Doyle Pierce estate, yet he proceeded to misuse the estate case number. This absence of case numbers renders the orders not only invalid but utterly indefensible under any standard of legal scrutiny.

## **4. Judge Singleton: Judge, Jury, and Executioner:**

Judge Singleton didn’t just overstep; he obliterated any semblance of impartiality. Acting as the *sua sponte* moving party, the victim, the prosecutor, and a key witness in the proceedings, he fused these roles into a grotesque parody of justice. This egregious blending of roles rendered any notion of a fair trial impossible. Judge Singleton’s conduct is a textbook example of why unchecked judicial power is so dangerous.

## **5. Systematic Violations of Constitutional Rights:**

Judge Singleton’s actions are not just unethical—they are unconstitutional. I was denied due process, deprived of legal representation, and subjected to a sham trial where Judge Singleton had already decided the outcome. His conduct has no place in any court of law and raises serious questions about his fitness to serve on the bench.

## **II. Legal Argument**

**Canon 3D(1) of the South Carolina Code of Judicial Conduct** mandates that a judge who becomes aware of another judge's misconduct, especially when it raises questions about that judge's fitness for office, must report it. The misconduct in this case is not just apparent; it is undeniable. Judge Singleton's actions grossly violate the principles of judicial conduct, and they demand immediate, decisive action.

### **III. Specific Violations of SCRCJ Rule 501 by Judge Danny Singleton**

#### **1. Defamation and Unlawful Banning from Court:**

- **Violation:** Judge Singleton issued an email accusing me of illegally offering legal advice and banned me from the probate court without due process, in blatant violation of **Canon 2A** and **Canon 3B(2)**.
- **Details:** The defamatory email was sent to uninterested parties, based on hearsay, and was entirely devoid of direct observation. This unlawful banishment violated my due process rights and exemplifies Judge Singleton's abuse of judicial power. **Canon 2A** emphasizes that a judge must act in a manner that promotes public confidence in the integrity and impartiality of the judiciary. Judge Singleton's actions here were anything but impartial or confidence-inspiring. **Canon 3B(2)** requires that a judge uphold the law—by issuing this ban without due process, Judge Singleton flouted the very legal standards he is sworn to uphold.

#### **2. Retaliation for Exercising Free Speech:**

- **Violation:** Judge Singleton retaliated against me for exercising my First Amendment rights by unlawfully incarcerating me for contempt without trial, violating **Canon 2A** and **Canon 3B(5)**.
- **Details:** My incarceration for recording a video in a public lobby—an act protected by the First Amendment—was motivated purely by Judge Singleton's personal animosity, with no legal justification. **Canon 2A** demands impartiality, yet Judge Singleton's actions were driven by personal vendetta rather than the law. **Canon 3B(5)** requires that a judge perform judicial duties without bias or prejudice. Judge Singleton's retaliatory actions demonstrate a complete disregard for this essential ethical requirement.

### **3. Improper Jurisdiction and Criminal Prosecution:**

- **Violation:** Judge Singleton exceeded his jurisdiction by prosecuting me for direct criminal contempt, a matter far outside the scope of probate court authority, violating **Canon 2A** and **Canon 3B(2)**.
- **Details:** The probate court is a court of limited jurisdiction, with no authority over criminal matters. Judge Singleton's decision to preside over a criminal contempt proceeding was a gross overstep and a clear violation of the law. **Canon 2A** mandates that a judge must respect and comply with the law to maintain public confidence in the judiciary. By usurping authority that he did not possess, Judge Singleton shattered any semblance of legal propriety. **Canon 3B(2)** reinforces that a judge must be faithful to the law and not act beyond their legal authority. Judge Singleton's conduct here shows a blatant disregard for these core principles.

### **4. Failure to Provide Notice of Administrative Order:**

- **Violation:** Judge Singleton violated **Canon 2A** and **Canon 3B(7)** by failing to ensure that the Administrative Order regarding electronic devices was posted as required, depriving me of proper notice.
- **Details:** Without this notice, I could not have known about the restrictions imposed by the order. Judge Singleton's failure to post the order on the courthouse doors, as mandated, rendered any enforcement against me unlawful and stripped me of any opportunity to comply, thereby making the resulting incarceration a grave injustice. **Canon 2A** emphasizes the importance of judicial integrity and public confidence—both of which are eroded when orders are not properly served or posted. **Canon 3B(7)** requires that a judge provide necessary notice and adhere to procedural requirements to ensure fairness. Judge Singleton's disregard for these mandates resulted in a fundamental violation of my rights.

### **5. Abuse of Judicial Power:**

- **Violation:** Judge Singleton abused his power by demanding I destroy video evidence and by incarcerating me without a proper legal basis, violating **Canon 3B(2)** and **Canon 2A**.

- **Details:** On May 29, 2024, Judge Singleton’s order to delete video evidence was not only unethical but also illegal, constituting an obstruction of justice and evidence tampering. **Canon 3B(2)** obliges a judge to follow the law, which Judge Singleton blatantly ignored by attempting to destroy evidence and incarcerate me without legal grounds. **Canon 2A** emphasizes the necessity of maintaining public confidence in the judiciary—confidence that is obliterated when a judge misuses his power to manipulate evidence and violate due process.

#### **6. Denial of Right to Counsel and Due Process:**

- **Violation:** Judge Singleton denied me the right to legal representation by refusing to grant a continuance, forcing me to proceed without counsel, in violation of **Canon 3B(4)** and **Canon 3B(2)**.
- **Details:** Despite having an approved application for a public defender, Judge Singleton denied a continuance, forcing me to represent myself in a criminal contempt proceeding—a clear violation of my Sixth Amendment rights. **Canon 3B(4)** requires that a judge afford every person who has a legal interest in a proceeding the right to be heard according to law. By denying me this right, Judge Singleton compromised the fairness of the entire process. **Canon 3B(2)** once again demands adherence to the law, which Judge Singleton ignored by denying my basic constitutional rights.

#### **7. Issuance of Orders Without Case Numbers:**

- **Violation:** Judge Singleton issued multiple orders, including sentencing orders, without case numbers, violating **Canon 3B(1)** and **Canon 3C(1)**.
- **Details:** These orders, lacking the most basic legal formalities, effectively made me an undocumented prisoner, without any legitimate legal basis for my detention. The complete absence of case numbers on these orders not only violated procedural rules but also rendered these orders legally void, further compounding the miscarriage of justice. **Canon 3B(1)** obliges judges to diligently discharge their administrative responsibilities and maintain order in proceedings. By failing to include case numbers, Judge Singleton demonstrated gross negligence and disregard for the integrity of judicial records. **Canon**

**3C(1)** requires that a judge maintain professional competence in judicial administration— Judge Singleton’s failure here is a stark violation of this requirement.

#### **8. Improper Role as Prosecutor and Judge:**

- **Violation:** Judge Singleton acted as both prosecutor and judge in the contempt proceedings, violating **Canon 3E(1)** and **Canon 2A**.
- **Details:** By serving as the moving party, prosecutor, witness, victim and judge, Judge Singleton obliterated any semblance of impartiality, turning the proceedings into a farce of justice. **Canon 3E(1)** mandates disqualification in any proceeding where a judge’s impartiality might reasonably be questioned. Judge Singleton’s refusal to recuse himself, despite his multiple conflicting roles, demonstrates a clear violation of this Canon. **Canon 2A** further supports the principle that justice must not only be done but must be seen to be done—Judge Singleton’s actions made a mockery of this essential judicial standard.

#### **9. Ex Parte Communications and Witness Coaching:**

- **Violation:** Judge Singleton engaged in *ex parte* communications and coached his subordinates, violating **Canon 3B(7)** and **Canon 2A**.
- **Details:** These actions destroyed any chance of a fair trial, as Judge Singleton’s biases were clearly reflected in his interactions with witnesses and his overall handling of the case. **Canon 3B(7)** explicitly prohibits a judge from engaging in *ex parte* communications concerning a pending or impending proceeding. Judge Singleton’s disregard for this rule compromised the integrity of the trial. **Canon 2A** emphasizes that judges must act at all times in a manner that promotes public confidence in the judiciary. By engaging in *ex parte* communications and coaching witnesses, Judge Singleton shattered this confidence and violated fundamental judicial ethics.

#### **10. Judicial Vindictiveness and Bias:**

- **Violation:** Judge Singleton displayed judicial vindictiveness, imposing harsh sentences and making biased statements in retaliation for my public criticism, violating **Canon 3E(1)** and **Canon 2A**.

- **Details:** Judge Singleton’s actions were driven by personal animosity, not legal reasoning. His refusal to recuse himself despite this bias was a gross violation of my right to an impartial hearing. **Canon 3E(1)** demands that a judge disqualify himself in any proceeding where his impartiality might reasonably be questioned. Judge Singleton’s actions, motivated by personal vendetta, violated this Canon and destroyed any semblance of fairness in the proceedings. **Canon 2A** reinforces the need for judges to act without bias or prejudice—Judge Singleton’s vindictiveness in this case is a flagrant breach of this fundamental principle.

#### **IV. Prayer for Relief**

WHEREFORE, I respectfully demand that this Court:

1. **Impose Immediate Sanctions:** Against Judge Danny Singleton for his flagrant violations of SCRCF Rule 501, including disqualification from any further involvement in this or any related cases.
2. **Vacate All Related Orders:** Issued by Judge Singleton in this matter, due to his clear bias, improper conduct, and lack of jurisdiction.
3. **Initiate a Judicial Inquiry:** To investigate the full extent of Judge Singleton’s misconduct and determine appropriate disciplinary action, including possible removal from the bench.
4. **Provide Any Other Relief:** That this Court deems just and proper to uphold the integrity of the judiciary and protect the rights of individuals subjected to such blatant judicial abuse.

Respectfully Submitted, this August 27, 2024.

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THE STATE OF SOUTH CAROLINA  
IN THE OCONEE COUNTY COURT OF COMMON PLEAS  
APPEAL FROM THE PROBATE COURT  
TENTH JUDICIAL CIRCUIT  
The Order of Judge Danny Singleton  
**CASE NO: 2024-CP-3700451**

JASON MICHAEL BOYLE----- Appellant,

V.

DANNY SINGLETON, “et al” -----Respondents

**PROOF OF SERVICE**

I hereby certify that on this August 27, 2024, a copy of the Motion for Sanctions was delivered to the following parties:

1. Jim Logan: [logan@loganandjolly.com](mailto:logan@loganandjolly.com)  
1805 N Boulevard, Anderson, SC. 29621
2. **Oconee County Detention Center:** [jchapman@oconeelaw.com](mailto:jchapman@oconeelaw.com)  
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3. **Oconee County Sheriff’s Department:** [mcrenshaw@oconeelaw.com](mailto:mcrenshaw@oconeelaw.com)  
300 S Church St, Walhalla, SC 29691
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Respectfully Submitted, this August 19, 2024.

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