

SUPREME JUDICIAL COURT OF MASSACHUSETTS

Steven L. Smith v. Commonwealth

SJC-13806 · No. SJC-13806 · Decided May 8, 2026

SUMMARY

The Massachusetts Supreme Judicial Court affirmed the denial of Steven L. Smith’s petition under G. L. c. 211, § 3. Smith sought relief concerning unresolved motions to withdraw his guilty pleas or obtain a new trial under Mass. R. Crim. P. 30(b). The court held that he had not shown exceptional circumstances or exhausted available trial-court measures, while urging the trial court to act promptly if the motions remained unresolved.

CASE DETAILS

COURT	Supreme Judicial Court of Massachusetts
JURISDICTION	Supreme Judicial Court of Massachusetts
DECIDED	May 8, 2026
DOCKET	SJC-13806
DISPOSITION	affirmed
PROCEDURAL POSTURE	Smith appealed from a single justice's denial of his petition for extraordinary relief under G. L. c. 211, § 3. He sought an order requiring the trial court to act on his Mass. R. Crim. P. 30 (b) motions or, alternatively, to set aside his guilty pleas and schedule a trial.
STANDARD OF REVIEW	Whether the single justice properly exercised discretion in denying extraordinary relief under G. L. c. 211, § 3.
PRECEDENTIAL VALUE	Published; precedential
PARTIES	Steven L. Smith v. Commonwealth

TOPICS

- post-conviction relief
- appellate procedure
- criminal procedure
- standard of review

PRACTICE AREAS

- criminal procedure
- post-conviction relief
- appellate procedure

QUESTIONS PRESENTED

1. Whether the single justice abused her discretion by denying Smith's petition under G. L. c. 211, § 3 when the trial court had not apparently ruled on his Mass. R. Crim. P. 30 (b) motions.
2. Whether Smith was entitled to an order directing the trial court to schedule a hearing on his Rule 30 (b) motions or to set aside his guilty pleas and set a trial date.

HOLDINGS

1. The single justice acted within her discretion in denying Smith's petition for extraordinary relief because he failed to demonstrate that he had availed himself of all measures available in the trial court to obtain rulings on his Rule 30 (b) motions.
2. The apparent lack of action on Smith's Rule 30 (b) motions did not require appellate extraordinary relief, but the court stated that the trial court should act promptly if the motions remained unresolved.

FACTUAL BACKGROUND

Smith pleaded guilty to one count of indecent assault and battery on a person age fourteen or older and three counts of witness intimidation. He was sentenced to a term of imprisonment deemed served and three years of probation with conditions. Acting pro se, he later filed multiple motions to withdraw his guilty pleas or for a new trial under Mass. R. Crim. P. 30 (b), but the docket did not indicate that the trial court had ruled on those motions. The trial-court docket also reflected numerous filings, probation-violation proceedings, and judicial-assignment issues.

PROCEDURAL HISTORY

In August 2024, Smith pleaded guilty to one count of indecent assault and battery and three counts of witness intimidation and received a sentence deemed served plus three years of probation with conditions. He subsequently filed several pro se motions to withdraw his guilty pleas or obtain a new trial under Mass. R. Crim. P. 30 (b), but the record did not show that the trial court had acted on those motions. In June 2025, he sought emergency relief in the county court; a single justice treated the filing as a petition under G. L. c. 211, § 3, and denied relief. The Supreme Judicial Court affirmed, concluding that Smith had not shown that he had pursued all available trial-court measures to obtain rulings on his motions.

DISPOSITION

affirmed

CASES CITED

- Commonwealth v. Fontanez, 482 Mass. 22, 25 (2019)
- Sellers v. Commonwealth, 464 Mass. 1015, 1015 (2013)
- Matthews v. D'Arcy, 425 Mass. 1021, 1022 (1997)