

SUPREME COURT OF SOUTH CAROLINA

State v. Butler

407 S.C. 376 (2014) · Decided March 12, 2014

SUMMARY

The South Carolina Supreme Court affirmed Beulah Ruth Butler’s convictions for voluntary manslaughter and possession of a firearm or knife during the commission of a violent crime. The court held that the trial court applied the correct standard in denying Butler’s motion for a directed verdict on self-defense because conflicting accounts and other evidence created a jury issue. The court distinguished precedent requiring a directed verdict where uncontroverted facts establish self-defense as a matter of law.

CASE DETAILS

COURT	Supreme Court of South Carolina
WRITING FOR THE COURT	Chief Justice Toal; Toal; Beatty; Hearn; Kittredge; Pleicones
JURISDICTION	South Carolina
DECIDED	March 12, 2014
DISPOSITION	affirmed
PROCEDURAL POSTURE	Petitioner sought review by writ of certiorari of the South Carolina Court of Appeals' decision affirming her convictions and the denial of her motion for a directed verdict on self-defense.
STANDARD OF REVIEW	On review of the denial of a directed verdict, the court views the evidence and all reasonable inferences in the light most favorable to the State. The court considers whether any direct or substantial circumstantial evidence reasonably tends to prove the defendant's guilt; it does not weigh the evidence.
PRECEDENTIAL VALUE	Published opinion; precedential
PARTIES	Beulah Ruth Butler v. State of South Carolina

TOPICS

- self defense
- criminal procedure
- standard of review
- appellate procedure
- evidence

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the trial court was required to apply a beyond-a-reasonable-doubt standard to the State's burden of disproving self-defense at the directed-verdict stage.
2. Whether the evidence was sufficient to create a jury issue on self-defense and therefore support denial of Butler's motion for a directed verdict.

HOLDINGS

1. At the directed-verdict stage, the trial court determines whether evidence exists to create a jury issue; it does not apply the beyond-a-reasonable-doubt burden used when self-defense is submitted to the jury.
2. The trial court properly denied Butler's motion for a directed verdict because the State presented sufficient direct or substantial circumstantial evidence to create a jury issue on self-defense.

KEY QUOTATIONS

"When ruling on a motion for a directed verdict, the trial judge is concerned with the existence of evidence, not its weight." (407 S.C. 381)

"If there is any direct evidence or any substantial circumstantial evidence reasonably tending to prove the guilt of the accused, the Court must find the case was properly submitted to the jury." (407 S.C. 381)

FACTUAL BACKGROUND

After leaving a bar, Butler and the victim argued at Butler's home. Butler testified that the victim assaulted and choked her, struck her with a DVD/VCR player, and pursued her as she attempted to escape; during a struggle over a knife, the victim sustained a fatal chest wound. Butler gave varying accounts to police, including that the victim rolled or fell onto the knife, and her physical injuries did not include bruising around her neck despite her testimony that she had been choked unconscious. The jury convicted Butler after hearing evidence concerning self-defense, accident, defense of habitation, and battered-person perceptions.

PROCEDURAL HISTORY

Butler was convicted of voluntary manslaughter and possession of a firearm or knife during the commission of a violent crime after the trial court denied directed-verdict motions based on self-defense. The South Carolina Court of Appeals affirmed, concluding that the State presented sufficient evidence to submit self-defense to the jury. The South Carolina Supreme Court granted certiorari and affirmed the court of appeals.

DISPOSITION

affirmed

CASES CITED

- State v. Wiggins, 330 S.C. 538, 544-45, 500 S.E.2d 489, 492-93 (1998)

- State v. Long, 325 S.C. 59, 62, 480 S.E.2d 62, 63 (1997)
- State v. Burkhardt, 350 S.C. 252, 262, 565 S.E.2d 298, 303 (2002)
- State v. Addison, 343 S.C. 290, 293, 540 S.E.2d 449, 451 (2000)
- State v. Weston, 367 S.C. 279, 292, 625 S.E.2d 641, 648 (2006)
- State v. Cherry, 361 S.C. 588, 593-94, 606 S.E.2d 475, 478 (2004)
- State v. Dickey, 394 S.C. 491, 716 S.E.2d 97 (2011)
- State v. Richburg, 250 S.C. 451, 459, 158 S.E.2d 769, 772 (1968)
- State v. Butler, Op. No. 2011-UP-127 (S.C. Ct. App. filed Mar. 28, 2011)

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