

SUPERIOR COURT OF PENNSYLVANIA

Commonwealth v. Lloyd

2026 Pa. Super. 115 (Superior Court of Pennsylvania 2026) · No. 1175 WDA 2025 · Decided June 8, 2026

SUMMARY

The Pennsylvania Superior Court affirmed Joy Rosellie Lloyd’s judgment of sentence for arson and related offenses. The court held that the Commonwealth did not violate Pennsylvania Rule of Criminal Procedure 573 by disclosing videos promptly after receiving them from police, and that the trial court did not abuse its discretion by denying exclusion of the videos and granting a continuance.

CASE DETAILS

COURT	Superior Court of Pennsylvania
WRITING FOR THE COURT	Sullivan, J.; Kunselman, J.; Stevens, P.J.E.
JURISDICTION	Pennsylvania Superior Court
DECIDED	June 8, 2026
DOCKET	1175 WDA 2025
DISPOSITION	affirmed
PROCEDURAL POSTURE	Appeal from the judgment of sentence entered after Lloyd's conviction of arson and related offenses, challenging the denial of a motion in limine based on an alleged discovery violation and the grant of the Commonwealth's motion for a continuance.
STANDARD OF REVIEW	An order denying a motion in limine is reviewed for evidentiary abuse of discretion. Discovery rulings are reviewed for an abuse of discretion and will not be disturbed absent manifest unreasonableness, partiality, prejudice, bias, ill will, or a lack of support amounting to clear error. A continuance decision is reviewed for manifest abuse of discretion resulting in prejudice to the defendant.
PRECEDENTIAL VALUE	Published and precedential Pennsylvania Superior Court opinion
PARTIES	Joy Rosellie Lloyd v. Commonwealth of Pennsylvania

TOPICS

- discovery criminal
- criminal procedure
- evidence
- appellate procedure
- standard of review

PRACTICE AREAS

criminal procedure

evidence

appellate procedure

QUESTIONS PRESENTED

1. Whether the Commonwealth violated Pennsylvania Rule of Criminal Procedure 573 by failing to disclose videos before the scheduled trial date, requiring exclusion of the videos.
2. Whether the trial court abused its discretion by granting the Commonwealth a continuance in the interests of justice to allow review of newly disclosed videos.

HOLDINGS

1. The Commonwealth did not violate Rule 573 because the videos were not shown to have been in its possession or control before the arresting officer provided them, and the Commonwealth promptly notified Lloyd after receiving them.
2. The trial court did not abuse its discretion by granting the Commonwealth's continuance so that both sides could reasonably review the newly received videos.

KEY QUOTATIONS

“The duty to disclose under Rule 573 extends to evidence in the Commonwealth’s possession and control, not evidence solely in police custody.” (at 8)

“Lloyd’s frustration with the Commonwealth’s previous listings of the case for trial without referring to outstanding discovery is not the type of delay Rule 573 intended to address.” (at 8)

FACTUAL BACKGROUND

Police charged Lloyd with setting fire to the porch of her relatives' home. Lloyd requested discovery, including videos held by law enforcement. The Commonwealth received the videos from the arresting officer shortly before the scheduled trial and promptly notified Lloyd's counsel; the videos included surveillance footage showing Lloyd obtaining gasoline, approaching the fire scene, and discarding the container. The trial court continued the trial to permit both sides to review the videos, later admitted them at the non-jury trial, and convicted Lloyd.

PROCEDURAL HISTORY

Lloyd was charged in November 2023 and later found competent to stand trial after court-ordered treatment. The trial court denied her motion in limine, granted the Commonwealth's motion for a continuance, and rescheduled the non-jury trial. After the trial court convicted Lloyd and imposed a sentence of three to seven years' imprisonment, it denied her post-sentence motion for a new trial. Lloyd timely appealed.

DISPOSITION

affirmed

CASES CITED

- Commonwealth v. Dodd, 339 A.3d 514, 517-519 (Pa. Super. 2025)
- Commonwealth v. Smith, 955 A.2d 391, 394-395 (Pa. Super. 2008)
- Commonwealth v. Collins, 957 A.2d 237, 253 (Pa. 2008)
- Commonwealth v. Long, 753 A.2d 272, 278 (Pa. Super. 2000)
- Commonwealth v. Brown, 200 A.3d 986, 993 (Pa. Super. 2018)
- Commonwealth v. Simmons, 56 A.3d 1280, 1285-1286 (Pa. Super. 2012)
- Brady v. Maryland, 373 U.S. 83 (1963)

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