

SUPREME JUDICIAL COURT OF MASSACHUSETTS

Muckle v. Lamothe

SJC-13903 · No. SJC-13903 · Decided June 4, 2026

SUMMARY

The Massachusetts Supreme Judicial Court affirmed the denial of Paul L. Muckle’s petition for relief under G. L. c. 211, § 3. The court held that Muckle had adequate remedies through the ordinary appellate process for challenging the District Court rulings and had not shown circumstances warranting extraordinary superintendence relief.

CASE DETAILS

COURT	Supreme Judicial Court of Massachusetts
JURISDICTION	Massachusetts Supreme Judicial Court
DECIDED	June 4, 2026
DOCKET	SJC-13903
DISPOSITION	affirmed
PROCEDURAL POSTURE	Appeal from a county court judgment affirming a single justice's denial, without a hearing, of Muckle's petition for relief under G. L. c. 211, § 3.
STANDARD OF REVIEW	The court will not reverse a single justice's decision absent an abuse of discretion or clear error of law.
PRECEDENTIAL VALUE	Published Massachusetts Supreme Judicial Court opinion
PARTIES	Paul L. Muckle v. Marie B. Lamothe, Arbella Insurance Group, Brockton Division of the District Court Department

TOPICS

- writ of certiorari
- appellate procedure
- interlocutory appeal
- standard of review
- civil procedure

PRACTICE AREAS

- civil procedure
- appellate procedure
- extraordinary writs and superintendence

QUESTIONS PRESENTED

1. Whether the single justice abused her discretion or committed an error of law by denying Muckle's petition for relief under G. L. c. 211, § 3.
2. Whether Muckle demonstrated that the ordinary appellate process was an inadequate and ineffective remedy for review of the District Court's interlocutory and related rulings.
3. Whether Muckle was entitled to extraordinary relief concerning a pending motion for reconsideration or alleged trial-court inaction.

HOLDINGS

1. A single justice does not err or abuse her discretion in denying relief under G. L. c. 211, § 3, when the petitioner has another adequate and effective remedy, including review through an ordinary appeal from a final judgment.
2. The Supreme Judicial Court will not reverse a single justice's decision absent an abuse of discretion or a clear error of law.
3. Extraordinary relief was not warranted because Muckle failed to demonstrate the absence or inadequacy of other remedies for the alleged inaction or pending motion.

KEY QUOTATIONS

"A single justice does not err or abuse her discretion in declining to grant relief pursuant to G. L. c. 211, § 3, where there are other adequate and effective remedies available." (at 2)

"Although this court has recognized that in very narrow circumstances " certain substantive rights may not survive the delays inherent in the normal appellate process," such that a direct appeal would not provide an adequate alternative remedy, Muckle has not demonstrated that this matter implicates any such right." (at 2)

FACTUAL BACKGROUND

Muckle filed a civil lawsuit in the Brockton Division of the District Court Department. A District Court judge treated a defendant's motion to remove the case to the Superior Court as a motion to dismiss and denied it; after Muckle filed a second amended complaint, another judge granted the defendants' motions to dismiss for failure to state a claim and denied several of Muckle's motions. Muckle then sought extraordinary relief under G. L. c. 211, § 3, although he conceded that the challenged rulings could be reviewed through the ordinary appellate process.

PROCEDURAL HISTORY

Muckle commenced a civil action in the Brockton Division of the District Court Department. After the District Court denied a motion seeking removal to the Superior Court, granted the defendants' Mass. R. Civ. P. 12(b)(6) motions, and denied various motions by Muckle, including a motion for summary judgment, Muckle petitioned the county court for relief under G. L. c. 211, § 3. A single justice denied the petition, and the Supreme Judicial Court affirmed.

DISPOSITION

affirmed

CASES CITED

- Matter of an Impounded Case, 491 Mass. 109, 114 (2022)
- Martineau v. Department of Correction, 423 Mass. 1007, 1007 (1996)
- Muckle v. Commonwealth, 455 Mass. 1008, 1008 (2009)
- Planned Parenthood League of Mass., Inc. v. Operation Rescue, 406 Mass. 701, 708 (1990)
- Muldoon v. Superior Court Dep't of the Trial Court, 439 Mass. 1010, 1010 (2003)
- Matthews v. D'Arcy, 425 Mass. 1021, 1022 (1997)
- Donald v. Commonwealth, 494 Mass. 1016, 1016 (2024)

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