

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
MISSOURI, SOUTHEASTERN DIVISION

Antoine Lee Boyle v. Caitlin Douglas, et al.

Boyle · No. No. 1:24 CV 06 CDP · Decided March 24, 2026

SUMMARY

The United States District Court for the Eastern District of Missouri denies without prejudice Antoine Lee Boyle’s fourth motion for appointment of counsel in his prisoner civil rights action. The court concludes that Boyle can adequately present his Eighth Amendment failure-to-protect claim and that the case’s factual and legal issues are not sufficiently complex to warrant appointed counsel. The court also states that alleged conduct and injuries outside the claims in this action must be raised in a separate civil rights action.

CASE DETAILS

COURT	United States District Court for the Eastern District of Missouri, Southeastern Division
WRITING FOR THE COURT	Catherine D. Perry
JURISDICTION	United States District Court for the Eastern District of Missouri, Southeastern Division
DECIDED	March 24, 2026
DOCKET	No. 1:24 CV 06 CDP
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff, a state prisoner proceeding in a civil-rights action, moved for appointment of counsel. The United States District Court denied the motion without prejudice.
STANDARD OF REVIEW	The court considered whether appointment of counsel was warranted for an indigent civil-rights plaintiff based on the factual complexity of the case, the plaintiff’s ability to investigate the facts, the existence of conflicting testimony, and the plaintiff’s ability to present his claims.
PRECEDENTIAL VALUE	Unpublished district-court memorandum and order; limited persuasive value.
PARTIES	Antoine Lee Boyle v. Caitlin Douglas, Claryssa Martin, Ethan Freeman

TOPICS

prisoners rights civil rights civil procedure

PRACTICE AREAS

prisoner civil rights appointment of counsel civil procedure

QUESTIONS PRESENTED

1. Whether the court should appoint counsel for Boyle in his prisoner civil-rights action.
2. Whether Boyle's imprisonment, limited legal resources and knowledge, alleged injuries, missing property and legal mail, and anticipated surgery warranted appointment of counsel.

HOLDINGS

1. There is no constitutional or statutory right to appointed counsel in civil cases.
2. Appointment of counsel was not warranted because Boyle demonstrated an ability to present his claims, and the factual and legal issues were not complex.

KEY QUOTATIONS

"There is no constitutional or statutory right to appointed counsel in civil cases."

"After reviewing the above factors, I conclude that the appointment of counsel is not warranted."

FACTUAL BACKGROUND

Boyle alleges that correctional officers failed to protect him from a February 2023 assault by a known enemy, despite awareness of the potential assault and witnessing it without intervening. He argued that imprisonment, limited law-library access, limited legal knowledge, injuries, missing property and legal mail, and upcoming surgery impaired his ability to litigate. The court found that his filings were thorough and organized and that the factual and legal issues were not complex.

PROCEDURAL HISTORY

The court directed issuance of process on Boyle's Eighth Amendment failure-to-protect claim against correctional officers Douglas, Martin, and Freeman. Freeman was twice dismissed without prejudice for lack of service, while Douglas and Martin answered. After an amended case-management order governed discovery and dispositive motions, Boyle filed his fourth motion for appointment of counsel. The court denied the motion without prejudice.

DISPOSITION

other

CASES CITED

- Patterson v. Kelley, 902 F.3d 845, 850 (8th Cir. 2018)
- Stevens v. Redwing, 146 F.3d 538, 546 (8th Cir. 1998)

OPINION

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MISSOURI
SOUTHEASTERN DIVISION ANTOINE LEE BOYLE,)) Plaintiff,)) v.) No. 1:24 CV 06 CDP
) CAITLIN DOUGLAS, et al.,)) Defendants.) MEMORANDUM AND ORDER In May 2024, I directed the Clerk to issue process in this prisoner civil rights action against defendants Ethan Freeman, Caitlin Douglas, and Claryssa Martin on plaintiff Antoine Lee Boyle's claim that, as correctional officers at Southeast Correction Center, they violated his Eighth Amendment rights when they failed to protect him against a prisoner assault by a known enemy.

Douglas answered the complaint through counsel in October 2024. Martin answered the complaint on her own behalf in November 2024 but provided no contact information to the Court or to the other parties. Freeman was dismissed from the case without prejudice in December 2024 for lack of service of process. I entered a Case Management Order on December 17, 2024, and imposed a schedule governing discovery and dispositive motions.

In May 2025, I permitted Boyle to reinstate his failure-to-protect claim against Freeman and to add an excessive-use-of-force claim against him. I also directed Martin to file with the Court an address of record for service.

In September 2025, Martin filed an answer to Boyle's complaint through counsel, and Boyle's claims against Freeman were again dismissed for lack of service of process. On September 17, I entered an Amended Case Management Order on Boyle's original claim against Douglas and Martin, directing that disclosures be made not later than November 17, 2025; that discovery be completed not later than March 17, 2026; and that motions for summary judgment be filed not later than April 17, 2026.

Trial is not set in the case. In substance, the case has remained silent since the entry of that Amended CMO. Boyle has now filed a motion for appointment of counsel, which is his fourth such motion in the case – the last having been denied without prejudice on May 7, 2025.

In his present motion, Boyle argues that his imprisonment limits his ability to litigate the case; that he has limited access to the law library and limited knowledge of the law; that he sustained injuries to his head and hands on February 15, 2026; that he is missing some property, including legal mail; that upcoming surgery will “derail” him for at least one year; and that the Missouri Department of Corrections continues in its failure to protect him from harm.

Notably, Boyle signed his motion on March 18, 2026, the day after discovery in this case closed. I will deny Boyle's motion. There is no constitutional or statutory right to appointed counsel in civil cases. *Patterson v. Kelley*, 902 F.3d 845, 850 (8th Cir. 2018).

In deciding whether to appoint counsel for an indigent plaintiff, I should consider relevant factors, including the factual complexity of the case, the ability of the indigent to investigate the facts, the existence of conflicting testimony, and the ability of the indigent to present his claims. *Stevens v. Redwing*, 146 F.3d 538, 546 (8th Cir. 1998). Boyle has shown that he can adequately present his claim to the Court.

His previous filings with the Court are thorough, organized, and appropriate to the issues addressed. The factual and legal issues in this case are not complex. Boyle claims that defendants Douglas and Martin failed to protect him from a prisoner assault in February 2023 despite being aware of the likely potential for such assault and witnessing it without intervening.

The discovery period in the case has closed, and whether conflicting evidence or testimony exists in the case will become apparent upon consideration of materials submitted on a motion for summary judgment, if one is filed.

After reviewing the above factors, I conclude that the appointment of counsel is not warranted. I will therefore deny Boyle's motion for the appointment of counsel at this time. To the extent Boyle's motion refers to alleged conduct and injuries not at issue in this case, he can bring a new prisoner civil rights action on those allegations, as the new allegations will not be considered as part of this case.

Accordingly, IT IS HEREBY ORDERED that plaintiff Antoine Lee Boyle's Motion for the Appointment of Counsel [72] 1s DENIED without prejudice. CATHERINE D. PERRY 2 UNITED STATES DISTRICT JUDGE Dated this 24th day of March, 2026. -4-