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SJC-13626

QUANTREIL LAURA vs. A JUSTICE OF THE DISTRICT COURT
DEPARTMENT.

October 23, 2025.

Supreme Judicial Court, Superintendence of inferior courts.
Mandamus.

The petitioner, Quantreil Laura, filed a petition pro se in the county court, seeking mandamus relief from the issuance of a default warrant in the Worcester Division of the District Court Department. The petition was denied by a single justice of this court, and Laura appealed. We affirm.

Background.¹ In 2022, a criminal complaint was issued against Laura in the Worcester Division. On August 5, 2022, a judge in the District Court found Laura in default for failing to appear at a pretrial hearing and issued a default warrant. On August 17, 2022, a notice of outstanding warrant was returned without service. Nearly two years later, Laura filed a "petition for writ of mandamus" in the county court. In the petition, Laura asserted that he never received "proper notice" of the pretrial hearing that led to the issuance of the default warrant. Laura also characterized the underlying proceedings as

¹ The respondent's motion for leave to file a record appendix is hereby allowed. We note that Laura did not file a record appendix, as required by Mass. R. A. P. 18, as appearing in 481 Mass. 1637 (2019). "Although we do not base our decision on that omission, we remind all litigants, whether or not represented by counsel, that they are required to comply with the rules of court." Roberts v. Hingham Div. of the Dist. Court Dep't, 486 Mass. 1001, 1002 n.4 (2020).

"nonconsensual," and suggested that the judge who issued the default warrant acted without jurisdiction. He argued that issuance of the warrant violated due process and "precipitated an immediate and irreparable harm to [Laura's] rights and health." On this basis, Laura requested that the respondent be ordered to immediately withdraw, stay, or quash the warrant. A single justice of this court denied the petition, concluding that Laura's allegations did not rise to the level of a failure of justice warranting mandamus relief. This appeal followed.²

Discussion. On appeal, our review is limited to determining whether the single justice committed a clear error of law or otherwise abused his discretion. See Weaver v. Commonwealth, 437 Mass. 1028, 1029 (2002). Relief in the nature of mandamus is "extraordinary and may be granted only to prevent a failure of justice in instances where there is no alternative remedy." Id., quoting Callahan v. Superior Court, 410 Mass. 1001, 1001 (1991). Mandamus relief is not appropriate where a petitioner seeks to compel actions that "are discretionary rather than ministerial" in nature. Vinnie v. Commonwealth, 475 Mass. 1011, 1012 (2016), quoting Boxford v. Massachusetts Highway Dep't, 458 Mass. 596, 606 (2010). Accordingly, "mandamus will not issue to direct a judicial officer to make a particular decision or to review, or reverse, a decision made by a judicial officer on an issue properly before him or her." Callahan, supra.

As a general matter, "the decision to declare a default or to lift a default is . . . left to the discretion of the judge" (quotation and citation omitted). Commonwealth v. Gomes, 407 Mass. 206, 211 (1990). See G. L. c. 276, § 36. Cf. Commonwealth v. Gomez, 78 Mass. App. Ct. 569, 575 (2011) ("judicial discretion is involved in determining whether to issue a default or forfeit bail"). Accordingly, because the decision to default Laura and issue a warrant was discretionary in nature, relief in the nature of mandamus is not appropriate. See Callahan, 410 Mass. at 1001.

Insofar as Laura seeks to assert that the District Court lacks jurisdiction over him, it does not appear that he has ever filed a motion to dismiss in the trial court raising such claims. In any event, we have repeatedly held that

² Laura has filed a "Conditional Motion to Accept Appellant's Memorandum as Non-Conforming Brief and Declaration of Good Faith Objection." To the extent that the motion seeks leave to file a nonconforming brief, it is hereby allowed. The motion is otherwise denied.

jurisdictional claims can be adequately addressed in the ordinary course of appeal after the conclusion of trial. See Welter v. Medical Professional Mut. Ins. Co., 495 Mass. 1027, 1028 (2025) ("Claims that a trial court lacked jurisdiction are routinely addressed in the ordinary course of appeal from final judgments"); Wallace v. Commonwealth, 492 Mass. 1012, 1012 (2023), and cases cited (principle that denial of motion to dismiss may not be appealed until after trial "is no less applicable where the claims asserted involve jurisdictional issues"). This is not a circumstance in which no alternative remedy is available. See Weaver, 437 Mass. at 1029.

In sum, the single justice did not commit a clear error of law or otherwise abuse his discretion in denying relief.

Judgment affirmed.

The case was submitted on briefs.

Quantreil Laura, pro se.

Nicole Nixon, Assistant Attorney General, for the respondent.