

OHIO COURT OF APPEALS, FIFTH APPELLATE DISTRICT

Abdelaziz v. Lugo

2025-Ohio-5703 · No. 2025 CAF 02 0016 · Decided December 22, 2025

SUMMARY

The Ohio Fifth District Court of Appeals affirmed the Delaware County Domestic Relations Division’s denial of Rana Abdelaziz’s objections to a parenting coordinator’s decision. The court held that the parenting coordinator acted within the authority granted by the parties’ agreed appointment order and that the trial court properly required an affidavit supporting objections and could deny them without an oral hearing. The court rejected all four assignments of error, including the appellant’s due process challenges.

CASE DETAILS

COURT	Ohio Court of Appeals, Fifth Appellate District
WRITING FOR THE COURT	Craig R. Baldwin; Andrew J. King; David M. Gormley
JURISDICTION	Ohio Court of Appeals, Fifth Appellate District
DECIDED	December 22, 2025
DOCKET	2025 CAF 02 0016
DISPOSITION	affirmed
PROCEDURAL POSTURE	Rana Abdelaziz appealed the Delaware County Court of Common Pleas, Domestic Relations Division's judgment overruling her objections to a parenting coordinator's decision that expanded and modified Calvin Lugo's parenting time and related arrangements.
STANDARD OF REVIEW	The appellate court reviewed the trial court's establishment of visitation rights for abuse of discretion, meaning the decision must be unreasonable, arbitrary, or unconscionable rather than merely an error of law or judgment.
PRECEDENTIAL VALUE	Published Ohio Court of Appeals opinion
PARTIES	Rana Abdelaziz v. Calvin Lugo

TOPICS

- visitation
- family law procedure
- appellate procedure
- due process
- standard of review

PRACTICE AREAS

Family law

Domestic relations

Appellate procedure

Constitutional due process

QUESTIONS PRESENTED

1. Whether the parenting coordinator exceeded the authority granted by the parties' agreed parenting coordinator order by eliminating supervision and expanding or modifying Lugo's parenting time.
2. Whether the trial court violated due process by ruling on Abdelaziz's objections without conducting an oral hearing.
3. Whether the trial court violated due process by failing to establish an objection process in its local rules or parenting coordinator order.
4. Whether requiring an affidavit with objections improperly limited legal objections and violated due process.

HOLDINGS

1. The parenting coordinator acted within the authority granted by the parties' agreed order and addendum because those documents expressly authorized decisions implementing Lugo's parenting time incrementally and addressing vacation parenting time.
2. The trial court did not violate due process by denying the objections without an oral hearing because it provided notice of the objection procedure, and the appellant failed to comply with the required affidavit filing.
3. The trial court did not violate due process by failing to establish an objection process because Delaware County Local Rule 33 provided such a process and the court's November 26, 2024 judgment entry separately specified the filing requirements.
4. Requiring an affidavit with objections did not impermissibly limit legal objections or violate due process.

KEY QUOTATIONS

“A PC's authority is limited to ancillary parenting issues. PCs are not permitted to issue decisions on any substantive portions of a shared-parenting plan, such as changes to custody or primary placement of a child.”
(¶ 17)

“The fundamental requirement of due process in any proceeding is notice “reasonably calculated, under all the circumstances, to apprise interested parties of the pendency of the action and afford them an opportunity to present their objections.”” (¶ 23)

FACTUAL BACKGROUND

The parties, who married in 2015, have three minor children and resolved their divorce in 2023 through an agreed parenting plan. Abdelaziz was designated sole residential parent and legal custodian, while Lugo initially received four hours of supervised parenting time each Sunday, subject to specified holiday and communication provisions. The parties agreed to use a parenting coordinator, whose order authorized incremental

implementation of Lugo's parenting time and decisions concerning vacation and holiday parenting time. After reviewing visitation reports and other information, the coordinator eliminated supervision, established additional parenting-time and holiday provisions, addressed communication and transportation, and provided for make-up time.

PROCEDURAL HISTORY

The parties divorced by agreement, with Abdelaziz designated sole residential parent and legal custodian and Lugo receiving supervised parenting time. The parties agreed to appoint a parenting coordinator and authorized the coordinator to implement Lugo's parenting time incrementally. The trial court adopted the coordinator's November 2024 decision and permitted objections, but Abdelaziz filed objections without the required supporting affidavit. The trial court overruled the objections, and the Fifth District affirmed.

DISPOSITION

affirmed

CASES CITED

- Blakemore v. Blakemore, 5 Ohio St. 3d 217, 219 (1983)
- Dewter v. Fairfield, 2024-Ohio-6080 (1st Dist.)
- Gregory v. Gregory, 2019-Ohio-5210 (1st Dist.)
- Ohio Valley Radiology Assocs., Inc. v. Ohio Valley Hosp. Assn., 28 Ohio St. 3d 118, 125, 502 N.E.2d 599 (1986)
- Armstrong v. Manzo, 380 U.S. 545, 550, 85 S. Ct. 1187, 14 L. Ed. 2d 62 (1965)
- Oliver v. Oliver, 2014-Ohio-5230 (5th Dist.)
- State ex rel. Duncan v. Chippewa Twp. Trustees, 73 Ohio St. 3d 728, 654 N.E.2d 1254 (1995)
- Doane v. Doane, 5th Dist. Guernsey No. 00CA21, 2001 WL 474267 (May 2, 2001)
- Sochor v. Smith, 5th Dist. Licking No. 00CA00001, 2000 WL 963110 (June 28, 2000)