

SUPREME COURT OF CALIFORNIA

Barefoot v. Jennings

Barefoot v. Jennings · No. S251574

SUMMARY

A person who was a beneficiary under a trust before amendments disinherited them has standing under Probate Code §17200 to petition the probate court challenging those amendments on grounds of incompetence, undue influence, or fraud, because if the amendments are invalid, the challenger remains a beneficiary with a present or future interest. The California Supreme Court held that the probate court's broad jurisdiction includes deciding the validity of trust provisions that would restore a challenger's beneficiary status, and that a court must accept well-pleaded standing allegations as true at the pleading stage. This ruling rejects the narrow interpretation that only currently named beneficiaries may petition, and it provides an orderly mechanism to litigate such challenges early in trust administration.

CASE DETAILS

COURT	Supreme Court of California
WRITING FOR THE COURT	Chin; Cantil-Sakauye; Corrigan; Liu; Cuéllar; Kruger; Groban
JURISDICTION	California
DOCKET	S251574
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Appeal from Court of Appeal judgment affirming dismissal of petition for lack of standing
STANDARD OF REVIEW	De novo review of standing determination, treating well-pleaded allegations as true
PRECEDENTIAL VALUE	published
PARTIES	Joan Mauri Barefoot v. Jana Susan Jennings, Shana Wren

TOPICS

- standing
- trusts
- probate procedure
- undue influence
- fraud
- testamentary capacity
- civil procedure

PRACTICE AREAS

- Probate
- Trusts
- Civil Procedure

QUESTIONS PRESENTED

1. Whether a person who was a beneficiary of a revocable trust before amendments that disinherited her, and who challenges those amendments on grounds of incompetence, undue influence, or fraud, has standing to petition the probate court under Probate Code section 17200.

HOLDINGS

1. An individual who claims that trust amendments eliminating her beneficiary status are invalid due to incompetence, undue influence, or fraud has standing under Probate Code section 17200 to petition the probate court to determine the validity of those amendments, because if the amendments are invalid, she is a beneficiary with a present or future interest.

KEY QUOTATIONS

“We conclude that claims that trust provisions or amendments are the product of incompetence, undue influence, or fraud, as is alleged here, should be decided by the probate court, if the invalidity of those provisions or amendments would render the challenger a beneficiary of the trust.”

“The probate court has broad jurisdiction 'over practically all controversies which might arise between the trustees and those claiming to be beneficiaries under the trust.'”

“'not only makes sense as a matter of judicial economy, but it also recognizes the probate court's inherent power to decide all incidental issues necessary to carry out its express powers to supervise the administration of the trust.'”

FACTUAL BACKGROUND

Joan Lee Maynard and her deceased husband established the Maynard Family Trust in 1986. After her husband's death in 1993, Maynard served as sole trustor. Plaintiff Joan Mauri Barefoot, one of Maynard's daughters, was a beneficiary and successor trustee under the Trust. Two other daughters, Jana Susan Jennings and Shana Wren, were also beneficiaries. From 2013 to 2016, Maynard executed eight amendments, culminating in the 24th amendment, which eliminated plaintiff's share and expressly disinherited her, and removed her as successor trustee. Maynard died on August 20, 2016. Plaintiff filed a petition alleging the amendments were invalid due to incompetence, undue influence, and fraud.

PROCEDURAL HISTORY

Plaintiff filed a petition in probate court challenging trust amendments as invalid due to incompetence, undue influence, and fraud. The probate court dismissed the petition for lack of standing. The Court of Appeal affirmed. The California Supreme Court granted review to resolve the standing question.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The Court of Appeal is to remand to the probate court for further proceedings consistent with the Supreme Court's opinion.

CASES CITED

- Estate of Giralдин, 55 Cal.4th 1058 (2012)
- Brock v. Hall, 33 Cal.2d 885 (1949)
- Warth v. Seldin, 422 U.S. 490 (1975)
- Estate of Plaut, 27 Cal.2d 424 (1945)
- Estate of Bissinger, 60 Cal.2d 756 (1964)
- Estate of Marre, 18 Cal.2d 184 (1941)
- Estate of Heggstad, 16 Cal. App.4th 943 (1993)
- Drake v. Pinkham, 217 Cal. App.4th 400 (2013)
- Conservatorship of Irvine, 40 Cal. App.4th 1334 (1995)
- Coalition of Concerned Communities, Inc. v. City of Los Angeles, 34 Cal.4th 733 (2004)
- Graham v. Lenzi, 37 Cal. App.4th 248 (1995)
- Barefoot v. Jennings, 27 Cal. App.5th 1 (2018)

CITED IN

- Barefoot v. Jennings, Barefoot v. Jennings, 8 Cal.5th 822 (2020)