

NORTH CAROLINA COURT OF APPEALS

In re R.L.

No. COA25-466 (N.C. Ct. App. June 3, 2026) · No. COA25-466 · Decided June 3, 2026

SUMMARY

The North Carolina Court of Appeals affirmed an initial disposition and permanency planning order concerning an abused and neglected juvenile. The court held that the respondent-mother waived appellate review of the trial court's judicial notice of Responsible Individuals List orders because she did not object. The court also concluded that competent evidence supported findings of chronic physical abuse and the cessation of reasonable reunification efforts under North Carolina General Statute section 7B-901.

CASE DETAILS

COURT	North Carolina Court of Appeals
WRITING FOR THE COURT	Judge Donna Stroud; Judge Stroud; Judge Arrowood; Judge Wood
JURISDICTION	North Carolina Court of Appeals
DECIDED	June 3, 2026
DOCKET	COA25-466
DISPOSITION	affirmed
PROCEDURAL POSTURE	Respondent-mother appealed from a combined initial disposition and permanency planning order that took judicial notice of Responsible Individuals List orders and determined that reasonable reunification efforts were not required.
STANDARD OF REVIEW	Findings of fact are reviewed for competent evidence and are conclusive if supported by any competent evidence. Dispositional choices, including eliminating reunification from the permanent plan, are reviewed for abuse of discretion.
PRECEDENTIAL VALUE	Published and precedential
PARTIES	Respondent-mother v. Craven County Department of Social Services

TOPICS

- family law procedure
- appellate procedure
- judicial notice
- statutory interpretation
- standard of review

PRACTICE AREAS

juvenile law

child welfare

family law

appellate procedure

evidence

QUESTIONS PRESENTED

1. Whether Mother preserved appellate review of the trial court's decision to take judicial notice of the Responsible Individuals List orders.
2. Whether competent evidence supported the trial court's findings of chronic physical abuse and other aggravating circumstances under North Carolina General Statute section 7B-901(c).
3. Whether the findings supported the trial court's decision to cease reasonable efforts toward reunification in the initial disposition order.
4. Whether the trial court's ultimate factual findings and conclusions of law were legally sufficient.

HOLDINGS

1. Mother waived appellate review of the trial court's taking judicial notice of the Responsible Individuals List orders because she did not object and, through counsel, expressly stated that she had no objection.
2. Competent evidence supported the trial court's findings that R.L. suffered chronic physical abuse and that aggravating circumstances existed under North Carolina General Statute section 7B-901(c).
3. The trial court did not abuse its discretion by determining that reasonable reunification efforts were not required in the initial disposition order.
4. The trial court's findings concerning aggravating circumstances were findings of ultimate fact, and its conclusion that reasonable reunification efforts were not required was supported by those findings.

KEY QUOTATIONS

"Because Mother raised no objection to the trial court's judicial notice of the RIL orders here, she has likewise waived appellate review." (at 3)

"Further, competent evidence supports the trial court's findings of fact, and those findings support its conclusion of law that reasonable reunification efforts should be ceased." (at 23)

FACTUAL BACKGROUND

R.L. was a three-month-old, pre-mobile infant who suffered multiple nonaccidental injuries, including fractures to both shoulders, a tibia fracture, two rib fractures, and multiple bruises. Medical evidence indicated that the injuries were likely inflicted during at least two separate episodes, and neither parent provided a plausible explanation. The parents were the child's only caregivers, and the injuries ceased after the child was removed from their home. The trial court found chronic physical abuse and other aggravating circumstances under North Carolina General Statute section 7B-901(c), and determined that reasonable reunification efforts were not required.

PROCEDURAL HISTORY

Craven County DSS filed a juvenile petition alleging that R.L. was abused, neglected, and dependent. The trial court adjudicated the child abused and neglected and entered Responsible Individuals List orders. After disposition and permanency planning hearings, the trial court entered an order determining that reunification efforts were not required and establishing guardianship with a concurrent plan of custody. Mother appealed the adjudication order and the combined disposition and permanency planning order, but raised no argument concerning the adjudication order.

DISPOSITION

affirmed

CASES CITED

- In re L.N.H., 382 N.C. 536, 879 S.E.2d 138 (2022)
- In re L.R.L.B., 377 N.C. 311, 857 S.E.2d 105 (2021)
- In re K.W., 282 N.C. App. 283, 871 S.E.2d 146 (2022)
- In re B.L.M.-S., 294 N.C. App. 44, 901 S.E.2d 687 (2024)
- In re NN, 296 N.C. App. 159, 907 S.E.2d 430 (2025)
- Shomette v. Needham, 298 N.C. App. 400, 915 S.E.2d 39 (2025)
- In re K.H., 281 N.C. App. 259, 867 S.E.2d 757 (2022)
- In re A.W., 377 N.C. 238, 856 S.E.2d 841 (2021)
- Kelly v. Kelly, 228 N.C. App. 600, 747 S.E.2d 268 (2013)
- Woodard v. Mordecai, 234 N.C. 463, 67 S.E.2d 639 (1951)
- In re M.T., 285 N.C. App. 305, 877 S.E.2d 732 (2022)

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