

SUPREME COURT OF THE STATE OF DELAWARE

Chavez T. Williams, Beverly A. Mundy, and Rosalyn Williams
Carroll v. Cynthia H. Hall and Shelley I. Carter

No. 186, 2025 (Del. Jan. 6, 2026) · No. No. 186, 2025 · Decided January 6, 2026

SUMMARY

The Delaware Supreme Court affirmed the Court of Chancery’s judgment quieting title to a vacant property in favor of Cynthia H. Hall and Shelley I. Carter. The Court held that the appellants failed to establish prejudice necessary for a laches defense, that the preponderance-of-the-evidence standard applied to determining family lineage, and that the appellees presented sufficient evidence establishing their descent from the property’s former owner. The order was issued per curiam, with Justice Griffiths signing on behalf of the Court.

CASE DETAILS

COURT	Supreme Court of the State of Delaware
WRITING FOR THE COURT	Traynor, Justice; Legrow, Justice; Griffiths, Justice
JURISDICTION	Supreme Court of the State of Delaware
DECIDED	January 6, 2026
DOCKET	No. 186, 2025
DISPOSITION	affirmed
PROCEDURAL POSTURE	Appeal by the defendants below from a Court of Chancery judgment quieting title to a Delaware property in favor of the plaintiffs below after a one-day trial.
STANDARD OF REVIEW	Questions of law, including evidentiary standards and the application of legal rules, are reviewed de novo. Factual findings are reviewed for clear error, with enhanced deference when based on witness credibility determinations.
PRECEDENTIAL VALUE	Published Delaware Supreme Court opinion
PARTIES	Chavez T. Williams, Beverly A. Mundy, Rosalyn Williams Carroll v. Cynthia H. Hall, Shelley I. Carter

TOPICS

- quiet title
- title disputes
- intestacy
- evidence
- appellate procedure

PRACTICE AREAS

real estate

probate

appellate procedure

evidence

equitable remedies

QUESTIONS PRESENTED

1. Whether the plaintiffs' quiet-title action was barred by laches.
2. Whether the Court of Chancery correctly applied the preponderance-of-the-evidence standard, rather than the clear-and-convincing-evidence standard, to the factual determination that Joshua Walters was Mariah Walters's son.
3. Whether the plaintiffs presented sufficient evidence under the preponderance standard to establish their lineage from Mariah Walters.

HOLDINGS

1. The action was not precluded by laches because the appellants failed to establish prejudice, an essential element of the defense.
2. The Court of Chancery correctly applied the preponderance-of-the-evidence standard to determine whether Joshua Walters was Mariah Walters's son; clear and convincing evidence was not required for that factual issue.
3. The plaintiffs presented sufficient evidence under the preponderance-of-the-evidence standard to establish that they were Mariah Walters's granddaughters through Joshua Walters.

KEY QUOTATIONS

“The defense of laches has two essential elements: (a) plaintiff must have knowledge of the claim; and (b) there must be prejudice to the defendant arising from an unreasonable delay by plaintiff in bringing the claim.” (¶ 12)

“The Court of Chancery correctly applied a preponderance of evidence standard in determining whether Joshua was Mariah’s son.” (¶ 13)

“Proof by a preponderance of the evidence means proof that something is more likely than not.” (¶ 14)

“Because we hold that the Court of Chancery applied the correct evidentiary standard, we defer to the court’s determination that Appellees are, more likely than not, Mariah’s granddaughters.” (¶ 15)

FACTUAL BACKGROUND

Mariah Jane Walters was the last record owner of a property in Frankford, Delaware. After Mariah died intestate, the parties disputed whether the property descended through her alleged son Joshua Walters to his descendants or through Mariah's sister Frances Mason to Mason's descendants. The estates were closed in 1979, with Mason identified as the beneficiary, but the property remained largely neglected and became a vacant, overgrown lot. The plaintiffs eventually brought a quiet-title action more than forty-eight years after Mariah's death and relied primarily on testimony concerning their lineage and family relationships.

PROCEDURAL HISTORY

The parties asserted competing ownership claims under Delaware's intestacy statute. After a one-day trial, the Court of Chancery rejected the defendants' laches defense, found by a preponderance of the evidence that Joshua Walters was Mariah Jane Walters's son and the plaintiffs' ancestor, and entered judgment quieting title in favor of the plaintiffs. The defendants appealed, challenging laches, the evidentiary standard, and the sufficiency of the lineage evidence.

DISPOSITION

affirmed

CASES CITED

- Levey v. Brownstone Asset Mgmt., LP, 76 A.3d 764, 768 (Del. 2013)
- CDX Holdings, Inc. v. Fox, 141 A.3d 1037, 1041 (Del. 2016)
- Fike v. Ruger, 752 A.2d 112, 113 (Del. 2000)
- Hudak v. Procek, 806 A.2d 140, 153 (Del. 2002)
- Wechsler v. Abramowitz, 1984 WL 8244, at *1 (Del. Ch. Aug. 30, 1984)
- State v. Sweetwater Point LLC, 2017 WL 2257377, at *8 (Del. Ch. May 23, 2017)
- Matter of Tavel, 661 A.2d 1061, 1070 (Del. 1995)
- G.L. v. S.D., 403 A.2d 1121, 1126-27 (Del. 1979)
- R.I. Off. of Gen. Treasurer on Behalf of Employees' Ret. Sys. of R.I. v. Paramount Glob., 331 A.3d 179, 190 (Del. Ch. 2025)