

COURT OF CHANCERY OF THE STATE OF DELAWARE

Eugenia Cole v. Simone Rayfield

Cole v. Rayfield · No. C.A. No. 2025-1091-SEM · Decided December 8, 2025

SUMMARY

The Delaware Court of Chancery grants the defendant’s motion to dismiss a complaint seeking to halt the private sale of estate property. The court holds that the plaintiff lacks standing because she is not a beneficiary, creditor, or executor, and rejects her reliance on an unsigned and unwitnessed addendum purporting to designate her as an alternate executor and co-trustee.

CASE DETAILS

COURT	Court of Chancery of the State of Delaware
WRITING FOR THE COURT	Selena E. Molina
JURISDICTION	Delaware Court of Chancery
DECIDED	December 8, 2025
DOCKET	C.A. No. 2025-1091-SEM
DISPOSITION	dismissed
PROCEDURAL POSTURE	Plaintiff brought an action seeking to halt or require an open-market sale of estate property. Defendant moved to dismiss under Court of Chancery Rule 12(b), arguing that Plaintiff lacked standing because she was not a beneficiary, executor, or creditor under the decedent's operative will or codicil. The court granted the motion and dismissed the complaint.
STANDARD OF REVIEW	On a Rule 12(b)(6) motion, the court accepts well-pleaded factual allegations as true, credits vague allegations that provide notice, and draws reasonable inferences in the plaintiff's favor. Dismissal is appropriate unless the plaintiff would be entitled to recover under any reasonably conceivable set of circumstances susceptible of proof. The court need not accept conclusory allegations or draw unreasonable inferences.
PRECEDENTIAL VALUE	published
PARTIES	Eugenia Cole v. Simone Rayfield, Executor

TOPICS

standing

motions to dismiss

probate procedure

estate administration

will contests

PRACTICE AREAS

Delaware civil procedure

probate and estate administration

trusts and estates

QUESTIONS PRESENTED

1. Whether Eugenia Cole had standing to challenge the executor's administration of the estate and proposed sale of estate property.
2. Whether the October 16, 2024 addendum could establish a legally cognizable interest in the estate when it was unsigned by the decedent and unwitnessed.
3. Whether the complaint should be dismissed under Court of Chancery Rule 12(b)(6).

HOLDINGS

1. Plaintiff lacked standing because she was not a beneficiary, creditor, or executor under the decedent's operative will or codicil, and there were no circumstances under which she would inherit from the decedent.
2. The purported addendum was not valid or enforceable because it was not signed by the decedent or any witnesses and therefore did not establish Plaintiff's legally cognizable interest in the estate.
3. Dismissal was proper because Plaintiff could not recover under any reasonably conceivable set of circumstances without standing to pursue relief concerning the estate.

KEY QUOTATIONS

"When applying this standard, dismissal is inappropriate unless the plaintiff would not be entitled to recover under any reasonably conceivable set of circumstances susceptible of proof;" (at 4)

"The issue of standing is concerned only with the question of who is entitled to mount a legal challenge and not with the merits of the subject matter controversy" (at 4-5)

"A beneficiary named under the decedent's current or prior will has standing to bring a caveat challenging the validity of a will before it is admitted to probate." (at 6)

FACTUAL BACKGROUND

Dwight J. Cole executed a will in 2018 and amended it by codicil in 2024. The codicil named Simone Rayfield as executrix, named other individuals as beneficiaries, and directed the executrix to sell the decedent's home after his death and distribute the proceeds to the beneficiaries. Eugenia Cole challenged Rayfield's proposed private sale at the property's appraised value, but Cole was not identified as a beneficiary, creditor, or executor under the operative will or codicil and relied instead on an unsigned and unwitnessed addendum.

PROCEDURAL HISTORY

Eugenia Cole filed her complaint on September 25, 2025, accompanied by additional filings seeking emergency relief concerning the proposed private sale of estate property. Simone Rayfield moved to dismiss on October 14, 2025. Cole opposed the motion and asserted that she had been an alternate executor and co-trustee under an earlier addendum; the court permitted a sur-reply and took the matter under advisement before granting dismissal.

DISPOSITION

dismissed

CASES CITED

- Wal-Mart Stores, Inc. v. AIG Life Ins. Co., 860 A.2d 312, 318 (Del. 2004)
- Delawareans for Educ. Opportunity v. Carney, 2018 WL 4849935, at *9 (Del. Ch. Oct. 5, 2018)
- MaD Invs. GRMD, LLC v. GR Cos., 2020 WL 6306028, at *2 (Del. Ch. Oct. 28, 2020)
- Dover Hist. Soc. v. City of Dover Plan. Comm'n, 838 A.2d 1103, 1110-11 (Del. 2003)
- Burkhart v. Genworth Fin., Inc., 250 A.3d 842, 852 (Del. Ch. 2020)
- In re Corbett v. Corbett, 2019 WL 6841432, at *4 (Del. Ch. Dec. 12, 2019)
- In re Maull, 1994 WL 374302, at *2 (Del. Ch. June 9, 1994)

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