

SUPREME COURT OF RHODE ISLAND

Rachel Mulligan Individually and as PPA R.M. v. Devin Duprey

No. 2025-118-Appeal (KC 24-1149) · No. No. 2025-118-Appeal (KC 24-1149) · Decided April 23, 2026

SUMMARY

The Rhode Island Supreme Court affirmed a Kent County Superior Court order granting Rachel Mulligan a preliminary injunction against Devin and Kelsey Duprey. The Court concluded that the trial justice did not abuse his discretion in determining that Mulligan established the required factors for injunctive relief, including likelihood of success, irreparable harm, balance of equities, and preservation of the status quo.

CASE DETAILS

COURT	Supreme Court of Rhode Island
WRITING FOR THE COURT	Chief Justice Suttell; Justice Robinson; Justice Lynch Prata; Justice Long
JURISDICTION	Rhode Island Supreme Court
DECIDED	April 23, 2026
DOCKET	No. 2025-118-Appeal (KC 24-1149)
DISPOSITION	affirmed
PROCEDURAL POSTURE	The Dupreys appealed a Superior Court order granting Mulligan a preliminary injunction.
STANDARD OF REVIEW	A trial justice's decision to grant a preliminary injunction is reviewed for abuse of discretion. The appellate court reviews whether the trial justice considered and resolved the four preliminary-injunction factors without abusing that discretion.
PRECEDENTIAL VALUE	Published Rhode Island Supreme Court order; precedential status is identified as published in the source metadata.
PARTIES	Devin Duprey, Kelsey Duprey v. Rachel Mulligan, individually and as PPA R.M.

TOPICS

- injunctions
- appellate procedure
- standard of review
- equitable relief
- civil procedure

PRACTICE AREAS

civil procedure

injunctive relief

appellate procedure

QUESTIONS PRESENTED

1. Whether the Superior Court abused its discretion by granting a preliminary injunction without adequately balancing the equities.
2. Whether the Superior Court improperly overlooked alleged fabricated allegations and failed to preserve the status quo.
3. Whether the Superior Court adequately considered the four preliminary-injunction factors.

HOLDINGS

1. A decision granting a preliminary injunction is reviewed for abuse of discretion, and the appellate court's task is to determine whether the trial justice considered and resolved the four required factors without committing an abuse of discretion.
2. A party seeking a preliminary injunction must demonstrate a reasonable likelihood of success on the merits, irreparable harm absent relief, a balance of equities favoring relief, and that the injunction will preserve the status quo.
3. The Superior Court acted within its discretion in granting the preliminary injunction because its findings supported likelihood of success, irreparable harm, a favorable balance of equities, and preservation of the status quo, notwithstanding the brevity of its analysis.

KEY QUOTATIONS

“A party need only establish a prima facie case warranting injunctive relief; therefore, we confine our task to reviewing whether the trial justice considered and resolved the well-known four factors without committing an abuse of discretion.” (-2-)

“Specifically, in order to succeed on a motion for preliminary injunction, the moving party must demonstrate that he or she “(1) has a reasonable likelihood of success on the merits, (2) will suffer irreparable harm without the requested injunctive relief, (3) has the balance of the equities, including the possible hardships to each party and to the public interest, tip in its favor, and (4) has shown that the issuance of a preliminary injunction will preserve the status quo.”” (-2-)

“Although this Court does not require perfection, a trial justice must, at a minimum, articulate a coherent, unambiguous basis of support for the four factors.” (-4-)

FACTUAL BACKGROUND

Mulligan and the Dupreys were neighbors. Mulligan testified that the Dupreys harassed her and her family through taunting, name-calling, loud music, and repeated mocking through bushes along the property line, including derogatory references to Mulligan and her daughter. The Superior Court characterized the conduct as unbridled harassment and concluded that injunctive relief was necessary to prevent irreparable future harm.

PROCEDURAL HISTORY

Mulligan filed a pro se complaint in Kent County Superior Court against the Dupreys and David Duprey. After a preliminary-injunction hearing at which the parties testified, the Superior Court granted a preliminary injunction against Devin and Kelsey Duprey but denied relief against David Duprey. Devin and Kelsey Duprey timely appealed, and the Supreme Court summarily affirmed after reviewing the written submissions, oral argument, and record.

DISPOSITION

affirmed

REMAND INSTRUCTIONS

The papers may be remanded to the Superior Court.

CASES CITED

- Bliven v. Wheeler, 23 R.I. 379, 380, 50 A. 644, 644 (1901)
- United Parcel Service, Inc. v. Griffiths, 297 A.3d 502, 502-03 (R.I. 2023) (mem.)
- Gabriel v. Willis, 326 A.3d 172, 176 (R.I. 2024)
- Finnimore & Fisher Inc. v. Town of New Shoreham, 291 A.3d 977, 983 (R.I. 2023)
- Gianfrancesco v. A.R. Bilodeau, Inc., 112 A.3d 703, 709 (R.I. 2015)