

SUPERIOR COURT OF PENNSYLVANIA

Russel J. Layton v. Nicole K. Layton

2025 Pa. Super. 111 · No. 1330 MDA 2024 · Decided May 23, 2025

SUMMARY

The Pennsylvania Superior Court reviewed Wife’s challenge to a prenuptial agreement incorporated into an amended divorce decree. The court held that the trial court failed to make sufficient factual findings and specific credibility determinations concerning alleged nondisclosure and duress, vacated the decree and related order, and remanded for further proceedings.

CASE DETAILS

COURT	Superior Court of Pennsylvania
WRITING FOR THE COURT	Murray, J.; King, J.; Stevens, P.J.E.
JURISDICTION	Pennsylvania Superior Court
DECIDED	May 23, 2025
DOCKET	1330 MDA 2024
DISPOSITION	vacated
PROCEDURAL POSTURE	Wife appealed from an amended divorce decree incorporating a prenuptial agreement and from the order denying her motion to declare the agreement invalid.
STANDARD OF REVIEW	The application of contract principles to a prenuptial agreement is reviewed for error of law or abuse of discretion. Questions of law, including whether established facts constitute duress, are reviewed de novo with plenary scope. The appellate court does not usurp the trial court's fact-finding function. A trial court must independently review the record but must adequately explain its factual findings and credibility determinations when rejecting a hearing officer's findings.
PRECEDENTIAL VALUE	Published precedential opinion of the Superior Court of Pennsylvania
PARTIES	Nicole K. Layton v. Russel J. Layton

TOPICS

- prenuptial agreements
- divorce
- duress
- appellate procedure
- standard of review

PRACTICE AREAS

family law

contracts

appellate procedure

civil procedure

QUESTIONS PRESENTED

1. Whether the trial court erred or abused its discretion by refusing to invalidate the prenuptial agreement for lack of fair and reasonable financial disclosure.
2. Whether the trial court erred or abused its discretion by refusing to invalidate the prenuptial agreement on the ground that Wife executed it under duress.
3. Whether the trial court abused its discretion by rejecting the divorce hearing officer's factual findings and credibility determinations without making its own specific findings and credibility determinations.

HOLDINGS

1. A trial court may reject a divorce hearing officer's factual findings and credibility determinations, but it must independently review the record and explain its decision with specific factual findings and credibility determinations. The trial court abused its discretion by rejecting the hearing officer's findings without adequately explaining why and without substituting its own detailed findings.
2. The court did not decide the merits of Wife's inadequate-disclosure and duress claims because the trial court's failure to make specific factual findings and credibility determinations prevented meaningful appellate review.

KEY QUOTATIONS

“Without specific factual findings and credibility determinations, we cannot discern the facts underlying the trial court’s decision and, apparently, neither can the parties.” (J-A11001-25 at 20)

“We therefore do not reach the merits of the disclosure or duress issues.” (J-A11001-25 at 20-21)

“On remand, we direct the trial court to make detailed factual findings and specific credibility determinations regarding all of the circumstances surrounding the agreement’s execution, and any other circumstances bearing on the parties’ credibility.” (J-A11001-25 at 21)

FACTUAL BACKGROUND

The parties married on October 12, 2008, after having lived together for years and having two children before marriage; four additional children were later born. Two days before the wedding, Husband presented Wife with a prenuptial agreement that Wife testified she could not fully read, understand, or have reviewed by her parents or counsel, and Husband provided no financial disclosure. Wife testified that Husband pressured her to sign by stating that her parents would lose \$50,000 spent on the wedding if she did not sign. A divorce hearing officer found Wife more credible and recommended that the agreement be invalidated for inadequate disclosure and duress, but the trial court rejected that recommendation without making specific findings regarding the disputed execution circumstances.

PROCEDURAL HISTORY

Husband filed a divorce complaint in 2019. Wife later asserted equitable-distribution and alimony claims and moved for a declaratory judgment invalidating the prenuptial agreement. A divorce hearing officer conducted an evidentiary hearing, recommended invalidation based on inadequate financial disclosure and duress, and made factual findings and credibility determinations favoring Wife. The trial court rejected the recommendation without conducting an additional evidentiary hearing, did not make specific factual findings or credibility determinations, dismissed Wife's economic claims, and entered an amended divorce decree incorporating the agreement. The Superior Court vacated the decree and related orders and remanded.

DISPOSITION

vacated

REMAND INSTRUCTIONS

Vacate the August 21, 2024 amended divorce decree and the December 5, 2023 order, as well as the portion of the December 15, 2023 order dismissing Wife's economic claims. Remand for further proceedings, including detailed factual findings and specific credibility determinations concerning all circumstances surrounding execution of the prenuptial agreement and any other circumstances bearing on the parties' credibility. The trial court may conduct an additional evidentiary hearing if necessary. The portion of the December 15 order revoking the hearing officer's appointment was not vacated.

CASES CITED

- Lewis v. Lewis, 234 A.3d 706, 711, 715 (Pa. Super. 2020)
- Simeone v. Simeone, 581 A.2d 162 (Pa. 1990)
- Lugg v. Lugg, 64 A.3d 1109, 1112-1114 (Pa. Super. 2013)
- Stoner v. Stoner, 572 Pa. 665, 819 A.2d 529, 533 (Pa. 2003)
- Paroly v. Paroly, 876 A.2d 1061, 1066 (Pa. Super. 2005)
- Busch v. Busch, 732 A.2d 1274, 1278 n.5 (Pa. Super. 1999)
- Carrier v. William Penn Broadcasting Co., 233 A.2d 519, 521 (Pa. 1967)
- Hamilton v. Hamilton, 591 A.2d 720, 722 (Pa. Super. 1991)
- Adams v. Adams, 848 A.2d 991, 993 (Pa. Super. 2004)
- Rollman v. Rollman, 421 A.2d 755, 758 (Pa. Super. 1980)
- Buckl v. Buckl, 542 A.2d 65, 68 (Pa. Super. 1988)
- Barton, 375 A.2d 96
- DeBias v. DeBias, 369 A.2d 396 (Pa. Super. 1976)
- Schrock v. Schrock, 359 A.2d 435 (Pa. Super. 1976)
- Gehris v. Gehris, 334 A.2d 753 (Pa. Super. 1975)
- Mintz v. Mintz, 392 A.2d 747, 749 (Pa. Super. 1978)
- Simeone v. Simeone, 551 A.2d 219, 225 (Pa. Super. 1988), affirmed, 581 A.2d 162 (Pa. 1990)
- In re A.D., 93 A.3d 888, 893 (Pa. Super. 2014)

- Santander Bank, N.A. v. Ansorge, 327 A.3d 259, 265 (Pa. Super. 2024)

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