

THIRD DISTRICT COURT OF APPEAL OF FLORIDA

Amal Crane v. Matthew Harrison Crane

No. 3D24-2262 (Fla. 3d DCA Jan. 14, 2026) · No. No. 3D24-2262 · Decided January 14, 2026

SUMMARY

The Third District Court of Appeal of Florida reviewed an attorney’s fee award of \$95,271.55 entered against a former wife following a contempt finding in a post-dissolution proceeding. The court held that the order was facially deficient because it did not determine the former husband’s need or the former wife’s present ability to pay, and it reversed and remanded solely for that determination.

CASE DETAILS

COURT	Third District Court of Appeal of Florida
WRITING FOR THE COURT	Miller, J.; Scales, C.J.; Gooden, J.
JURISDICTION	Third District Court of Appeal of Florida
DECIDED	January 14, 2026
DOCKET	No. 3D24-2262
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Former wife appealed a final post-dissolution order awarding the former husband \$95,271.55 in attorney's fees following a contempt finding.
STANDARD OF REVIEW	Not expressly stated; the court reviewed the facial sufficiency of the attorney's-fee order and declined to reach issues that were meritless or not reviewable because of the appellate record.
PRECEDENTIAL VALUE	Published
PARTIES	Amal Crane v. Matthew Harrison Crane

TOPICS

- family law procedure
- dissolution of marriage
- appellate procedure
- remedies

PRACTICE AREAS

- family law
- attorney's fees
- appellate procedure

QUESTIONS PRESENTED

1. Whether the final order awarding attorney's fees after a contempt finding was facially deficient because it failed to determine the former husband's need and the former wife's present ability to pay.
2. Whether the other issues raised by the former wife warranted appellate relief.

HOLDINGS

1. An order awarding attorney's fees in a post-dissolution contempt proceeding is facially deficient when it fails to reflect whether the recipient spouse has a need for the fees and whether the other spouse has the present ability to pay them.

KEY QUOTATIONS

"We conclude the order is facially deficient for failing to reflect whether the former husband has a need and the former wife has the present ability to pay the awarded fees." (at 2)

"Accordingly, we reverse and remand solely for such a determination." (at 2)

FACTUAL BACKGROUND

This was a high-conflict, post-dissolution proceeding between former spouses. Following a finding that Amal Crane was in contempt of court, the circuit court entered a final order awarding Matthew Harrison Crane \$95,271.55 in attorney's fees. The order did not reflect whether the former husband had a need for the award or whether the former wife had the present ability to pay it.

PROCEDURAL HISTORY

The Circuit Court for Miami-Dade County entered a final order awarding Matthew Harrison Crane attorney's fees after finding Amal Crane in contempt of court. Amal Crane appealed, raising multiple challenges. The Third District reversed and remanded solely for the trial court to determine whether the former husband had a need for the fees and whether the former wife had the present ability to pay.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

Remand solely for the trial court to determine whether Matthew Harrison Crane has a need for the attorney's-fee award and whether Amal Crane has the present ability to pay it.

CASES CITED

- Brewer v. Solovsky, 945 So. 2d 610, 611 (Fla. 4th DCA 2006)
- Cohen v. Cohen, 414 So. 3d 244, 246-48 (Fla. 4th DCA 2025)
- Applegate v. Barnett Bank of Tallahassee, 377 So. 2d 1150, 1152 (Fla. 1979)
- Du Perault v. Du Perault, 270 So. 3d 424, 425 (Fla. 4th DCA 2019)

- Hammad v. Hammad, 146 So. 3d 532, 533 (Fla. 5th DCA 2014)
- Green v. Green, 650 So. 2d 181, 182 (Fla. 1st DCA 1995)
- Goulding v. Goulding, 368 So. 3d 49, 56-57 (Fla. 2d DCA 2023)

OPINION

PER CURIAM.

Third District Court of Appeal State of Florida Opinion filed January 14, 2026. Not final until disposition of timely filed motion for rehearing. _____ No. 3D24-2262 Lower Tribunal No. 17-3528-FC-04 _____ Amal Crane, Appellant, vs. Matthew Harrison Crane, Appellee. An Appeal from the Circuit Court for Miami-Dade County, Christina Marie DiRaimondo, Judge.

Amal Crane, in proper person. Nancy A. Hass, P.A., and Nancy A. Hass (Hollywood); Hertz • Sager, and Christy L. Hertz, and Katie E. Sager, for appellee. Before SCALES, C.J., and MILLER, and GOODEN, JJ. MILLER, J., In this high-conflict, post-dissolution case, the former wife, appellant, Amal Crane, challenges a final order granting the former husband, appellee, Matthew Harrison Crane, \$95,271.55 in attorney's fees following a finding of contempt of court.

She raises a myriad of issues on appeal; all but one are meritless or evade our review. See *Brewer v. Solovsky*, 945 So. 2d 610, 611 (Fla. 4th DCA 2006) (“An award of attorney’s fees requires competent and substantial evidence. Competent evidence includes invoices, records and other information detailing the services provided as well as the testimony from the attorney in support of the fee.”) (citations omitted); *Cohen v. Cohen*, 414 So.

3d 244, 246–48 (Fla. 4th DCA 2025) (former husband was not required to present expert testimony to corroborate reasonableness of his requested award of attorney’s fees); *Applegate v. Barnett Bank of Tallahassee*, 377 So. 2d 1150, 1152 (Fla. 1979) (“Without a record of the trial proceedings, the appellate court can not properly resolve the underlying factual issues so as to conclude that the trial court’s judgment is not supported by the evidence or by an alternative theory.”).

We conclude the order is facially deficient for failing to reflect whether the former husband has a need and the former wife has the present ability to pay the awarded fees. See *Du Perault v. Du Perault*, 270 So. 3d 424, 425 (Fla. 4th DCA 2019) (“[B]ecause the final judgment contained a fee provision for future 2 enforcement actions which failed to account for the parties’ need and ability to pay, we reverse and remand to the trial court for correction of the enforcement fee provision within the final judgment.”); *Hammad v. Hammad*, 146 So.

3d 532, 533 (Fla. 5th DCA 2014) (reversing and remanding the award of attorney’s fees where the trial court failed to make the required findings in the final judgment regarding one spouse’s

financial need and the other spouse's ability to pay); *Green v. Green*, 650 So. 2d 181, 182 (Fla. 1st DCA 1995) (noting that one spouse's financial need and the other spouse's present ability to pay is a legal conclusion); *Goulding v. Goulding*, 368 So.

3d 49, 56–57 (Fla. 2d DCA 2023) (holding that an order awarding fees as a sanction for wife's contempt was facially deficient for its failure to address whether wife had present ability to pay and husband had need for the award).

Accordingly, we reverse and remand solely for such a determination. Reversed and remanded. 3