

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)

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