

SUPERIOR COURT OF PENNSYLVANIA

In the Interest of: D.L.D.

2025 Pa. Super. 231 · No. 19 MDA 2025 · Decided October 10, 2025

SUMMARY

This dissenting opinion addresses whether sufficient evidence supported extending D.L.D.’s involuntary outpatient mental health treatment under Pennsylvania’s Mental Health Procedures Act. The dissent concludes that D.L.D.’s history of medication noncompliance, decompensation, and dangerous behavior established by clear and convincing evidence a reasonable probability of serious harm absent continued treatment, and would affirm the trial court’s order.

CASE DETAILS

COURT	Superior Court of Pennsylvania
WRITING FOR THE COURT	Olson, J.; Lazarus, P.J.; Beck, J.
JURISDICTION	Pennsylvania Superior Court
DECIDED	October 10, 2025
DOCKET	19 MDA 2025
DISPOSITION	reversed
PROCEDURAL POSTURE	D.L.D. appealed from the Centre County Court of Common Pleas order extending his involuntary outpatient mental-health treatment for up to 180 days. The dissent would have affirmed the trial court’s order, although the majority reversed it.
STANDARD OF REVIEW	The court reviews the facts of record in the light most favorable to the original decision-maker to determine whether the requisite clear-and-convincing-evidence standard was met.
PRECEDENTIAL VALUE	Published dissenting opinion; the dissent itself is not controlling precedent.
PARTIES	D.L.D. v. The County

TOPICS

- health law
- standard of review
- appellate procedure

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the County presented sufficient evidence under the Mental Health Procedures Act to establish that D.L.D. continued to be a clear and present danger to himself.
2. Whether the evidence clearly and convincingly established a reasonable probability that D.L.D. would die, sustain serious bodily injury, or suffer serious physical debilitation within 30 days if involuntary outpatient treatment were discontinued.
3. What standard governs appellate review of the sufficiency of evidence supporting an involuntary commitment under the Mental Health Procedures Act.

HOLDINGS

1. The sufficiency of evidence supporting an involuntary commitment is reviewed by examining the facts of record in the light most favorable to the original decision-maker to determine whether the requisite standard of proof was met.
2. The dissent would hold that the County established by clear and convincing evidence that D.L.D. remained a clear and present danger to himself and that there was a reasonable probability of death, serious bodily injury, or serious physical debilitation within 30 days without continued treatment.

KEY QUOTATIONS

“In reviewing the sufficiency of evidence to support an involuntary commitment under the MHPA, we review “the facts of record in the light most favorable to the original decision-maker to determine whether the requisite standard of proof has been met.”” (-3 to -4)

“Deference to the facts as found by the original factfinder is of particular importance in circumstances where the factfinders have specialized training or knowledge that makes them uniquely qualified to reach the findings and conclusions the General Assembly has entrusted them to make.” (-4)

“The best predictor of future behavior is past behavior” (-7)

FACTUAL BACKGROUND

D.L.D. has schizophrenia and a history of repeated involuntary inpatient and outpatient psychiatric commitments beginning in 2018. When not properly medicated, he has experienced paranoid thinking, refusal to eat because he believed his food was contaminated, threatening and aggressive behavior, and running into oncoming traffic. His treating psychiatrist testified that D.L.D. has poor insight into his illness, historically stops taking medication after discharge, and would likely decompensate within weeks and face a substantial risk of serious harm without continued court-ordered treatment.

PROCEDURAL HISTORY

The County petitioned under the Mental Health Procedures Act for an additional 180 days of involuntary outpatient treatment. A mental health review officer found sufficient evidence to extend treatment, and the

Centre County Court of Common Pleas entered an order on December 12, 2024, extending treatment for up to 180 days. D.L.D.'s petition to review the certification was denied, and he appealed to the Superior Court of Pennsylvania.

DISPOSITION

reversed

CASES CITED

- Interest of J.W.S., 284 A.3d 889 (Pa. Super. 2022)
- In re Vencil, 152 A.3d 235 (Pa. 2017)

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