

SUPREME COURT OF THE STATE OF NEW YORK, APPELLATE DIVISION,
THIRD DEPARTMENT

J.M. v. New York State

2026 NY Slip Op 02316 · No. CV-25-1022 · Decided April 16, 2026

SUMMARY

The Appellate Division, Third Department affirmed dismissal of an amended complaint challenging the alleged administration and endorsement of SCPA article 17-a guardianships. The court held that Disability Rights New York lacked organizational standing because it failed to establish an injury-in-fact, and that the individual plaintiffs' ADA and Rehabilitation Act claims were time-barred under New York's three-year personal-injury limitations period. The court also declined to apply the continuing violation doctrine and found the equitable tolling argument unpreserved.

CASE DETAILS

COURT	Supreme Court of the State of New York, Appellate Division, Third Department
WRITING FOR THE COURT	Pritzker, J.; Aarons, J.P.; McShan, J.; Corcoran, J.
JURISDICTION	New York Supreme Court, Appellate Division, Third Department
DECIDED	April 16, 2026
DOCKET	CV-25-1022
DISPOSITION	affirmed
PROCEDURAL POSTURE	Plaintiffs appealed from an order of the Supreme Court, Albany County, granting the Unified Court System's motion to dismiss the amended complaint.
STANDARD OF REVIEW	De novo review of the motion to dismiss and the legal questions concerning standing and statute of limitations; the court also reviewed preservation of the equitable-tolling argument.
PRECEDENTIAL VALUE	Published New York Appellate Division opinion; precedential within the Third Department subject to applicable New York appellate authority.
PARTIES	J.M. et al., Disability Rights New York v. Unified Court System of the State of New York

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QUESTIONS PRESENTED

1. Whether Disability Rights New York established organizational standing by showing an injury in fact.
2. Whether the individual plaintiffs' ADA and Rehabilitation Act claims were timely under New York's three-year personal-injury limitations period.
3. Whether the continuing-violation doctrine postponed accrual of the ADA and Rehabilitation Act claims.
4. Whether the plaintiffs preserved their equitable-tolling argument for appellate review.

HOLDINGS

1. Disability Rights New York lacked organizational standing because it did not demonstrate that its expenditures advocating for individuals affected by SCPA article 17-a guardianships drained its resources beyond its authorized purpose or frustrated that purpose, and therefore failed to establish an injury in fact.
2. The ADA and Rehabilitation Act claims were time-barred because, absent an express federal limitations period, New York's three-year personal-injury limitations period applied and the claims accrued when the individual plaintiffs were placed under SCPA article 17-a guardianships in 2001, 2007, and 2011.
3. The continuing-violation doctrine did not apply because the plaintiffs did not allege use of the Unified Court System's forms within the three years before the action commenced and asserted only generalized claims that failed to identify a discriminatory practice directed at the individual plaintiffs.
4. The equitable-tolling argument was unpreserved because plaintiffs did not raise it before Supreme Court.

KEY QUOTATIONS

“Accordingly, Supreme Court properly determined that DRNY lacked standing because it failed to prove that it had suffered any injury-in-fact.” ([*2])

“Thus, the instant action is time-barred because it was commenced in 2024, decades after the individual plaintiffs were placed under guardianship.” ([*3])

FACTUAL BACKGROUND

Plaintiffs alleged that individuals with intellectual and developmental disabilities were subjected to illegal and discriminatory guardianships under SCPA article 17-a and that the Unified Court System supported those guardianships through its forms and website. Disability Rights New York alleged that it expended substantial resources advocating for individuals under, or facing, article 17-a guardianships. The individual plaintiffs were placed under such guardianships in 2001, 2007, and 2011, while the action was commenced in 2024.

PROCEDURAL HISTORY

Plaintiffs sued New York State, the Unified Court System, and state judicial officials seeking declaratory, injunctive, and compensatory relief concerning SCPA article 17-a guardianships and alleging violations of the ADA, the Rehabilitation Act, and constitutional rights. Supreme Court dismissed the claims against the Unified Court System, concluding that Disability Rights New York lacked organizational standing and that the ADA and Rehabilitation Act claims were time-barred; the court also found sovereign-immunity grounds for several claims. The Appellate Division affirmed.

DISPOSITION

affirmed

CASES CITED

- Matter of Gronbach v New York State Educ. Dept., 221 AD3d 1385, 1387 (3d Dept 2023), lv denied 41 NY3d 906 (2024)
- Matter of Long Is. Pure Water, Ltd. v New York State Dept. of Health, 209 AD3d 1128, 1129 (3d Dept 2022), lv denied 39 NY3d 911 (2023)
- Matter of Lansingburgh Cent. Sch. Dist. v New York State Educ. Dept., 196 AD3d 937, 939 (3d Dept 2021)
- Matter of Mental Hygiene Legal Serv. v Daniels, 33 NY3d 44, 51, 53 (2019)
- Matter of Lawyers for Children v New York State Off. of Children & Family Servs., 218 AD3d 913, 914-915 (3d Dept 2023)
- Matter of Borrello v Hochul, 221 AD3d 1484, 1488 (4th Dept 2023)
- Mixon v Grinker, 157 AD2d 423, 426 (1st Dept 1990)
- Vega-Ruiz v Northwell Health, 992 F3d 61, 63 (2d Cir 2021)
- Purcell v New York Inst. of Tech.-Coll. of Osteopathic Med., 931 F3d 59, 62-63 (2d Cir 2019)
- Haynes v Williams, 162 AD3d 1377, 1378 (3d Dept 2018), lv denied 32 NY3d 906 (2018)
- Olivieri v Stifel, Nicolaus & Co., Inc., 112 F4th 74, 88 (2d Cir 2024)
- Snyder v Town Insulation, 81 NY2d 429, 432 (1993)
- Selkirk v State of New York, 249 AD2d 818, 819 (3d Dept 1998)
- Valtchev v City of New York, 400 Fed Appx 586, 589 (2d Cir 2010)
- Samuels v City of New York, 2023 WL 5717892, *5, 2023 U.S. Dist. LEXIS 156539, *13 (S.D.N.Y. 2023)
- Kumar v Franco, 211 AD3d 1437, 1441 (3d Dept 2022)
- Matter of United Jewish Community of Blooming Grove, Inc. v Washingtonville Cent. Sch. Dist., 207 AD3d 9, 15 n 2 (3d Dept 2022), affd 42 NY3d 348 (2024)