

LOUISIANA COURT OF APPEAL, FOURTH CIRCUIT

In re: Interdiction of Stephanie R. DeHoog

No. 2025-CA-0543 (La. Ct. App. Feb. 24, 2026) · No. 2025-CA-0543 · Decided February 24, 2026

SUMMARY

The Louisiana Fourth Circuit Court of Appeal reviewed an appeal from the denial of a petition for full or limited interdiction of Stephanie R. DeHoog. The court reversed the dismissal, rendered a judgment of limited interdiction, and remanded for appointment of a curator and undercurator. It also reversed the award of compensation to the curator ad hoc after March 28, 2025, and ordered a refund of fees received after June 13, 2023.

CASE DETAILS

COURT	Louisiana Court of Appeal, Fourth Circuit
WRITING FOR THE COURT	Karen K. Herman; Nakisha Ervin-Knott; Monique G. Morial
JURISDICTION	Louisiana Court of Appeal, Fourth Circuit
DECIDED	February 24, 2026
DOCKET	2025-CA-0543
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Appellants appealed the May 22, 2025 judgment denying their petition for full interdiction or, alternatively, limited interdiction, dismissing the petition with prejudice, and allowing a curator ad hoc to be compensated through March 28, 2025.
STANDARD OF REVIEW	The determination whether to order interdiction is a factual finding reviewed for manifest error or clear wrongness. The petitioner bears the burden of proving entitlement to interdiction by clear and convincing evidence.
PRECEDENTIAL VALUE	nonprecedential
PARTIES	Derek DeHoog, Eleanor DeHoog v. Stephanie R. DeHoog

TOPICS

- guardianship procedure
- guardianships
- appellate procedure
- standard of review
- attorney fees

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether clear and convincing evidence supported a full or limited interdiction under Louisiana Civil Code articles 389 and 390.
2. Whether the trial court erred by holding the limited-interdiction issue open for monitoring for more than eight months and considering supplemental evidence that was not provided to appellants or included in the appellate record.
3. Whether the trial court was required to discharge the curator ad hoc after Stephanie DeHoog retained private counsel under Louisiana Code of Civil Procedure article 4549(C), and whether fees paid for services after that point had to be refunded.

HOLDINGS

1. Full interdiction was not supported because the record did not establish that Stephanie DeHoog's interests could be protected only through the more restrictive remedy of full interdiction.
2. Clear and convincing evidence established that a limited interdiction over Stephanie DeHoog's medical and financial affairs was necessary.
3. The trial court erred by deferring the limited-interdiction determination for monitoring and by relying on supplemental evidence that was not made available to appellants or included in the appellate record.
4. Louisiana Code of Civil Procedure article 4549(C) required the trial court to discharge C. Hunter King once Stephanie DeHoog retained private counsel, and fees paid for work performed after June 13, 2023 had to be refunded.
5. On remand, the trial court was ordered to determine whether Eleanor DeHoog was legally qualified to serve as curatrix and, if so, appoint her curatrix and Derek DeHoog undercurator; alternatively, the court was to consider a nonprofit curatorship service program.

KEY QUOTATIONS

“Full interdiction is warranted only when a person’s interests cannot be protected by less restrictive means.” (15)

“An individual is a candidate for full interdiction only if the individual is consistently unable to make reasoned decisions regarding the care of both his person and his property, or to communicate those decisions.” (15)

“If a person is unable consistently to make reasoned decisions regarding their person or property, or any aspect of either their person or property, then that person is a candidate for a limited interdiction.” (15)

“The evidence presented clearly demonstrates that Ms. DeHoog is unable to consistently make rational decisions with regard to her healthcare and her financial affairs.” (18)

“If the defendant either retains his own attorney, or intelligently and voluntarily waives the assistance of an attorney, the court shall discharge the court-appointed attorney” (21)

FACTUAL BACKGROUND

Stephanie DeHoog had a longstanding history of schizoaffective disorder, psychotic episodes, involuntary hospitalizations, medication noncompliance, poor insight into her illness, and behavior that placed herself and others at risk. The evidence showed recurring difficulty managing medical care and potential danger during psychotic episodes, as well as concerns about her ability to manage substantial financial assets from a community-property settlement. Expert and lay testimony supported a limited interdiction over her medical and financial affairs, although the evidence did not establish that full interdiction was necessary.

PROCEDURAL HISTORY

Derek DeHoog and Eleanor DeHoog filed a petition for interdiction in the Civil District Court for Orleans Parish. After a two-day trial, the trial court declined to order full interdiction, deferred the issue of limited interdiction for monitoring, and later dismissed the petition after a follow-up hearing. The court also continued the appointment and compensation of C. Hunter King as curator ad hoc after Stephanie DeHoog retained private counsel. The Fourth Circuit reversed, rendered a limited interdiction over medical and financial affairs, remanded for appointment of a curator and undercurator, and ordered repayment of fees paid to King for work after June 13, 2023.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The trial court must render a judgment of limited interdiction over Stephanie DeHoog's medical and financial affairs in accordance with Louisiana Code of Civil Procedure article 4551; expeditiously conduct a hearing regarding appointment of Eleanor DeHoog as curatrix and Derek DeHoog as undercurator; determine whether Eleanor is legally qualified and, if necessary, require a registered agent for service of process; alternatively consider appointing a nonprofit curatorship service program; and enforce the order requiring C. Hunter King to refund all curator ad hoc fees received for work performed after June 13, 2023 within ninety days of the opinion.

CASES CITED

- In re Benson, 2015-0874, p. 5 (La. App. 4 Cir. 2/24/16), 216 So. 3d 950, 955
- Interdiction of Constance, 2023-0318, p. 17 (La. App. 5 Cir. 3/22/24), 384 So. 3d 1111, 1124
- Matter of Interdiction of Keith, 17-1573 (La. App. 1 Cir. 6/22/18), 2018 WL 3080456
- Bombace v. Starr Indemnity & Liability Co., 2025-0037, p. 11 (La. App. 4 Cir. 6/24/25), 416 So. 3d 8, 16
- In re: Interdiction of Stephanie R. DeHoog, 2024-C-0675 (La. App. 4 Cir. 11/18/24), unpublished
- In re: Interdiction of Stephanie R. DeHoog, 2024-CA-0809 (La. App. 4 Cir. 3/27/25), unpublished

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