

SUPREME COURT OF OHIO

Eggleston v. Wood

2025-Ohio-5292 · No. 2024-1791 · Decided November 26, 2025

SUMMARY

The Supreme Court of Ohio held that Civ.R. 6(D) does not add three days to the deadline for filing objections to a magistrate's decision under Civ.R. 53(D)(3)(b)(i) when the decision is mailed by the clerk. Because the objection period runs from the filing of the magistrate's decision rather than service on the parties, the court affirmed the Ninth District Court of Appeals' judgment.

CASE DETAILS

COURT	Supreme Court of Ohio
WRITING FOR THE COURT	Chief Justice Kennedy; Justice Fischer; Justice DeWine; Justice Brunner; Justice Deters; Justice Hawkins; Justice Shanahan
JURISDICTION	Supreme Court of Ohio
DECIDED	November 26, 2025
DOCKET	2024-1791
DISPOSITION	affirmed
PROCEDURAL POSTURE	Discretionary appeal from the Ninth District Court of Appeals concerning the timeliness of objections to a magistrate's decision.
STANDARD OF REVIEW	De novo review applies because whether Civ.R. 6(D) extends the time to file objections to a magistrate's decision is a question of law.
PRECEDENTIAL VALUE	Published Ohio Supreme Court opinion
PARTIES	Christian Wood v. Jedda K. Eggleston

TOPICS

- family law procedure
- child support
- appellate procedure
- civil procedure
- standard of review

PRACTICE AREAS

- Civil procedure
- Appellate procedure
- Family law

QUESTIONS PRESENTED

1. Whether Civ.R. 6(D) adds three days to the 14-day period for filing objections to a magistrate's decision under Civ.R. 53(D)(3)(b)(i) when the clerk serves the decision by United States mail or commercial-carrier service.
2. Whether the objection period begins when the magistrate's decision is filed with the clerk or when it is mailed to the parties.

HOLDINGS

1. Civ.R. 6(D) does not add three days to the period for filing objections to a magistrate's decision when the decision is served by mail or commercial-carrier service.
2. The 14-day period for objecting to a magistrate's decision begins when the decision is filed with the clerk, not when the clerk mails the decision to the parties.

KEY QUOTATIONS

“We hold that the plain language of Civ.R. 6(D) does not give parties to whom the clerk mails a magistrate’s decision an additional three days to file written objections.” (¶ 1)

“Civ.R. 6(D) does not extend the time a party has to object to a magistrate’s decision that the clerk serves by United States mail or a commercial-carrier service.” (¶ 16)

FACTUAL BACKGROUND

Eggleston and Wood had a child in January 2021. In December 2023, a magistrate issued a decision ordering Wood to pay \$25,000 per month in child support, retroactive to January 2021, despite finding that the child-support schedule supported an amount of \$2,144.39 per month. The magistrate's decision was filed with the clerk and mailed to the parties on December 13; Wood filed objections on December 28, one day after the trial court determined the 14-day objection period had expired.

PROCEDURAL HISTORY

A magistrate in the Lorain County Court of Common Pleas, Domestic Relations and Juvenile Division, issued a decision concerning visitation and child support. Wood filed objections after the trial court determined that the objections were untimely, and the trial court denied his motions for leave and for leave to file a supplemental brief. The Ninth District affirmed, holding that Civ.R. 6(D) did not extend the time for filing objections under Civ.R. 53(D)(3)(b)(i). The Supreme Court of Ohio accepted a single proposition of law and affirmed the Ninth District.

DISPOSITION

affirmed

CASES CITED

- State v. Hudson, 2022-Ohio-1435
- Duganitz v. Ohio Adult Parole Auth., 2001-Ohio-1283

- Pulfer v. Pulfer, 110 Ohio App.3d 90, 92-93 (3d Dist. 1996)
- Zanesville v. Rouse, 2010-Ohio-2218
- Harvey v. Hwang, 2004-Ohio-4112

Retrieved from lawtools.ai · <https://lawtools.ai/cases/state/supreme-court-of-ohio-supreme-court-of-ohio/2025/eggleston-v-wood-sl2zu9no>