

COURT OF APPEALS OF INDIANA

Deitra Mangrum and Randy Mangrum v. Randi Mangrum and Bryce Walker

25A-MI-2003 (Ind. Ct. App. Apr. 30, 2026) · No. 25A-MI-2003 · Decided April 30, 2026

SUMMARY

The Indiana Court of Appeals reviewed the termination of a grandparent visitation order involving Deitra and Randy Mangrum and Randi Mangrum and Bryce Walker. The court held that the grandparents waived their challenge to the change of judge but concluded that the trial court abused its discretion by terminating visitation under the Grandparent Visitation Act. The court reversed and remanded.

CASE DETAILS

COURT	Court of Appeals of Indiana
WRITING FOR THE COURT	Chief Judge Tavitias; Judge Weissmann; Judge Foley
JURISDICTION	Court of Appeals of Indiana
DECIDED	April 30, 2026
DOCKET	25A-MI-2003
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Grandparents appealed the Lake Circuit Court's order terminating an existing grandparent-visitation order and the denial of their motion to correct error.
STANDARD OF REVIEW	Interpretation of the Indiana Trial Rules is reviewed de novo. An order modifying grandparent visitation is reviewed for abuse of discretion; the trial court abuses its discretion when its decision is contrary to law or against the logic and effect of the facts and circumstances before it.
PRECEDENTIAL VALUE	Published opinion; precedential
PARTIES	Deitra Mangrum, Randy Mangrum v. Randi Mangrum, Bryce Walker

TOPICS

- grandparent rights
- family law procedure
- appellate procedure
- waiver
- standard of review

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the grandparents waived their challenge to the trial court's grant of the mother's motion for change of judge by failing to object below.
2. Whether the trial court abused its discretion by terminating the existing grandparent-visitation order.

HOLDINGS

1. The grandparents waived their challenge to the trial court's grant of the mother's motion for change of judge because they did not object when the motion was granted and raised the issue for the first time on appeal.
2. Indiana Code section 31-17-5-7 requires only that modification of a grandparent-visitation order serve the best interests of the child; it does not independently require proof of a substantial change in circumstances.
3. The trial court abused its discretion by terminating the grandparent-visitation order because the mother's petition relied substantially on reasons and evidence previously rejected or litigated, and termination rewarded the parents' continued noncompliance with the existing order.

KEY QUOTATIONS

“The Grandparent Visitation Act “contemplates only occasional, temporary visitation that does not substantially infringe on a parent’s fundamental right to control the upbringing, education, and religious training of their children.”” (at 12)

“Similarly, here, Indiana Code Section 31-17-5-7 requires only that modification of the grandparent visitation order serve the best interests of the child.” (at 13)

“Mother’s motion “invited the trial court to reward her persistent non-compliance.”” (at 16)

FACTUAL BACKGROUND

Deitra and Randy Mangrum, the maternal grandparents, had regularly visited their grandchildren until the children's mother stopped contact in December 2022. The trial court granted the grandparents' petitions for visitation in March 2024, but the parents permitted only one visit and then ceased communication and visitation. After finding the parents in contempt, a new judge granted the mother's petition to terminate the visitation order based on asserted changes including the parents' separation and shared custody, homeschooling and extracurricular activities, the older child's wishes, and additional children in the family.

PROCEDURAL HISTORY

The trial court initially granted the grandparents' petitions for visitation and entered a visitation schedule. After the parents ceased complying with the order, the trial court found them in contempt. Following a change of judge, the trial court granted the mother's petitions to terminate grandparent visitation, and the grandparents

appealed. The Court of Appeals held that the change-of-judge issue was waived but reversed the termination order and remanded.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

Remanded for proceedings consistent with the opinion concerning the grandparent-visitation order.

CASES CITED

- In re Paternity of V.A., 10 N.E.3d 61, 63 (Ind. Ct. App. 2014)
- Mann v. Russell's Trailer Repair, Inc., 787 N.E.2d 922, 924-25 (Ind. Ct. App. 2003), trans. denied
- Wolfe v. Wolfe, 793 N.E.2d 1164, 1167 (Ind. Ct. App. 2003), trans. denied
- Fergason v. Brooks, 189 N.E.3d 1102, 1104 (Ind. Ct. App. 2022)
- In re Visitation of M.L.B., 983 N.E.2d 583, 584, 586 (Ind. 2013)
- In re Adoption of A.A., 51 N.E.3d 380, 390 (Ind. Ct. App. 2016), trans. denied
- Miller v. Carpenter, 965 N.E.2d 104, 110 (Ind. Ct. App. 2012)
- D.G. v. W.M., 118 N.E.3d 26, 31 (Ind. Ct. App. 2019), trans. denied
- Sightes v. Barker, 684 N.E.2d 224, 231 (Ind. Ct. App. 1997), trans. denied
- In re Adoption of Johnson, 612 N.E.2d 569, 572 (Ind. Ct. App. 1993), trans. denied
- Mangrum v. Mangrum, Case No. 24A-MI-832
- Mangrum v. Mangrum, Case No. 25A-MI-1084
- Kirk v. Kirk, 770 N.E.2d 304, 307 (Ind. 2002)
- In re Visitation of L-A.D.W., 38 N.E.3d 993, 998 (Ind. 2015)
- K.I. ex rel. J.I. v. J.H., 903 N.E.2d 453, 462 (Ind. 2009)

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