

SUPREME COURT OF THE STATE OF DELAWARE

Matter of Jane Tyler

Matter of Jane Tyler · No. No. 545, 2018 · Decided April 17, 2019

SUMMARY

The Delaware Supreme Court affirmed the Court of Chancery’s orders maintaining under seal a Guardianship Monitoring Program report concerning alleged sexual abuse of a person with a disability. The Court held that Court of Chancery Rule 180-D provided an adequate basis for confidentiality and that the appellants’ asserted due process interests did not outweigh the State’s interest in protecting abuse-investigation information. The Court did not decide whether 24 Del. C. § 1768 independently supported sealing.

CASE DETAILS

COURT	Supreme Court of the State of Delaware
WRITING FOR THE COURT	Karen L. Valihura; Leo E. Strine, Jr., Chief Justice; Karen L. Valihura, Justice; Michael L. Seitz, Justice
JURISDICTION	Delaware
DECIDED	April 17, 2019
DOCKET	No. 545, 2018
DISPOSITION	affirmed
PROCEDURAL POSTURE	Appeal from the Court of Chancery's denial of exceptions to a Master's orders concerning the continued sealing of a Guardianship Monitoring Program report.
STANDARD OF REVIEW	The Supreme Court reviewed the Court of Chancery's rulings and concluded that the court did not err in relying on Court of Chancery Rule 180-D. The opinion also states that the Vice Chancellor conducted a de novo review of the Master's report and supplement.
PRECEDENTIAL VALUE	Published Delaware Supreme Court opinion
PARTIES	Jane Tyler's parents and legal guardians

TOPICS

- guardianship procedure
- guardianships
- procedural due process
- appellate procedure
- constitutional law

PRACTICE AREAS

guardianships

appellate procedure

constitutional law

civil procedure

QUESTIONS PRESENTED

1. Whether Court of Chancery Rule 180-D authorized continued sealing of the Guardianship Monitoring Program report upon a showing that access by specific interested parties would be harmful or detrimental to Jane.
2. Whether maintaining the Guardianship Monitoring Program report under seal violated the appellants' due process rights.
3. Whether the Vice Chancellor improperly overruled the appellants' exceptions without meaningful review or a sufficient explanation.

HOLDINGS

1. Court of Chancery Rule 180-D provided an adequate basis to keep the Guardianship Monitoring Program report under seal because access by the appellants could be harmful or detrimental to the disabled person.
2. Assuming the appellants had a cognizable due process interest in addressing reputational harm, their due process interests did not require release of the Guardianship Monitoring Program report.
3. The Vice Chancellor did not improperly summarily overrule the appellants' exceptions; the record reflected a de novo review of the Master's report and supplement.

KEY QUOTATIONS

“The Appellants’ due process interests do not require release of the GMP Report.” (12)

“In sum, based upon the record before us, we conclude that the Court of Chancery did not err by invoking Rule 180-D to keep the GMP Report under seal.” (12)

FACTUAL BACKGROUND

Jane Tyler is a twenty-six-year-old woman with severe autism who is unable to speak, care for herself, or make significant decisions. She lives in a group home under contract with Delaware's Division of Developmental Disabilities Services, and her parents are her co-guardians. After group-home staff alleged that Mr. Tyler had sexually abused Jane, the matter was referred to law-enforcement and state agencies, and the Guardianship Monitoring Program investigated. The resulting report was filed under seal, and the Court of Chancery continued restrictions on Mr. Tyler's visitation while denying the parents access to the report.

PROCEDURAL HISTORY

The Court of Chancery appointed the appellants as Jane Tyler's co-guardians in 2011. After allegations that Mr. Tyler sexually abused Jane, the Court of Chancery entered interim and subsequent orders restricting visitation and directed the Guardianship Monitoring Program to investigate. The Master denied the appellants' petition seeking relief and access to sealed materials; the Court of Chancery overruled their exceptions and adopted the

Master's report and supplemental order. The appellants appealed, but no longer challenged the visitation restrictions and primarily contested the continued sealing of the report.

DISPOSITION

affirmed

CASES CITED

- Pennsylvania v. Ritchie, 480 U.S. 39 (1987)
- Meeks v. State, 1996 WL 637905 (Del. Oct. 25, 1996) (TABLE)
- Smith v. New Jersey Division of Child Protection and Permanency, 723 Fed. App'x 119 (3d Cir. 2018)

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