



Note: In the case title, an asterisk () indicates an appellant and a double asterisk (**) indicates a cross-appellant. Decisions of a three-justice panel are not to be considered as precedent before any tribunal.*

ENTRY ORDER

OCTOBER TERM, 2026

Hayley Slayton v. Liam Edwards*	}	APPEALED FROM:
	}	Superior Court, Windsor Unit;
	}	Family Division
	}	CASE NO. 25-FA-01638
		Trial Judge: Elizabeth D. Mann

In the above-entitled cause, the Clerk will enter:

Defendant, self-represented, appeals from the family division's extension of a final relief-from-abuse (RFA) order during the pendency of the parties' divorce proceeding. We affirm.

The record reflects the following. In June 2025, plaintiff filed a complaint seeking an RFA order on behalf of herself and the parties' minor daughter under 15 V.S.A. § 1103(a). Following a hearing, the family division found that defendant abused plaintiff and their child and there was a danger of further abuse and therefore issued a final RFA order. Among other things, the June 2025 order: awarded plaintiff sole possession of the parties' residence and prohibited defendant from entering it; temporarily awarded plaintiff parental rights and responsibilities (PRR) for daughter; and set forth a parent-child-contact (PCC) schedule for defendant and required him to stay away from daughter with the exception of these times. See *id.* § 1103(c)(2)(C), (D) (providing that RFA order may include temporary award of PRR and set forth PCC conditions).

In September 2025, plaintiff filed for divorce. The court issued an order consolidating the divorce and RFA proceedings. See V.R.F.P. 4.3(a)(2) (providing that if party to abuse-prevention action subsequently files complaint for divorce, the court "will immediately consolidate" the two proceedings).

In November 2025, the family division issued a temporary order governing PRR and PCC in the divorce docket. Under this order, plaintiff maintained sole PRR, but the court adjusted defendant's PCC schedule. The court explained that the RFA order was amended to the extent necessary to conform with the temporary order, but in all other respects, it remained in effect. It also issued a modified final RFA order in conformance with the terms of the temporary order on PRR and PCC.

In December 2025, plaintiff moved to extend the final RFA order. See 15 V.S.A. § 1103(e) (providing that court may extend final RFA order “upon motion of the plaintiff, for such additional time as it deems necessary to protect the plaintiff, the children, or both, from abuse”). In her motion, she indicated that she did not seek to amend the provisions of the temporary PRR and PCC order entered in the divorce docket, but only to extend the RFA order. The court held a hearing on February 2, 2026; later that day, it issued an order indicating that the RFA order had been “[e]xtended without modification” for an additional six-month period.

Defendant then filed motions to clarify and vacate the extended RFA order. In support of the motion to clarify, defendant generally indicated that the parties did not agree, following the extension, as to the operative PCC order.

On February 9, 2026, the judge in the divorce docket issued an order indicating that it appeared that the RFA court incorrectly extended the terms of the June 2025 RFA order when it intended to extend the terms of the November 2025 RFA order—the modified version that incorporated the temporary PCC provisions imposed in the divorce docket. The court set a hearing on defendant’s motions to clarify and vacate, but provided that, “[i]n the meantime,” the temporary order in the divorce docket controlled parental rights and responsibilities.

Defendant filed a notice of appeal in both dockets. Because his notice of appeal identified the “contact provisions” of the February 9 order as the issue on appeal, this Court issued an order clarifying the scope of our jurisdiction. Therein, we explained that the February 9 order—which provided only that the temporary PCC schedule issued in the divorce docket applied pending further hearing—was not a final order and was therefore not appealable as of right. See In re Burlington Bagel Bakery, Inc., 150 Vt. 20, 21 (1988) (“To be final and appealable an order must end litigation on the merits or conclusively determine the rights of the parties, leaving nothing for the court to do but execute the judgment.” (quotation omitted)). We noted, however, that defendant’s appeal was timely from the extended RFA order and advised him to limit the issues raised on appeal accordingly.

The arguments raised in defendant’s brief are not thus limited. He primarily appears to challenge the temporary PCC schedule issued in the divorce docket, arguing that it is not in his daughter’s best interests. As discussed above, however, the temporary PCC order is an interlocutory order and not appealable as of right. *Id.* Defendant also suggests that the divorce court erred in issuing an interim child-support order. This order, too, is beyond the scope of our review: both because it is an interlocutory order and because it was issued after defendant filed his notice of appeal. *Id.*; Knapp v. Dasler, 2024 VT 65, ¶ 33, 220 Vt. 371 (explaining that order defendant sought to challenge “is beyond the scope of this appeal because it was entered after defendant filed his notice of appeal”).

To the extent that defendant’s brief can be construed to raise a challenge to the extended RFA order, we are unable to review it because defendant did not order a transcript of the February 2 hearing. See V.R.A.P. 10(b)(1) (“By failing to order a transcript, the appellant waives the right to raise any issue for which a transcript is necessary for informed appellate review.”). “The family court has broad discretion in deciding whether to extend an existing RFA order.” Townsend v. Townsend, 2026 VT 32, ¶ 5. On appeal, “[w]e will uphold the court’s findings if they are supported by the evidence and its conclusions if they are supported by the findings.” *Id.* The extended RFA order does not set forth the basis—presumably stated on the record—on which the family division concluded that an extension was necessary to protect

plaintiff and the child from further abuse. In the absence of a transcript, we are unable to review its conclusion that 15 V.S.A. § 1103(e) was satisfied.

Finally, defendant requests that this Court modify the RFA order to allow him to access certain personal property at plaintiff's residence. A request to modify a final RFA order must be addressed to the trial court in the first instance. See 15 V.S.A. § 1103(e) (providing that trial court may modify final RFA order "at any subsequent time upon motion by either party and a showing of a substantial change in circumstance"). Defendant has not demonstrated that he made such a request below, thereby preserving the issue for our review on appeal. V.R.A.P. 28(a)(4) (requiring that appellant's brief include "the issues presented, how they were preserved, and appellant's contentions and the reasons for them—with citations to the authorities, statutes, and parts of the record on which the appellant relies"); Pcolar v. Casella Waste Sys. Inc., 2012 VT 58, ¶ 19, 192 Vt. 343 (explaining that self-represented litigants must satisfy minimum briefing standards of Rule 28(a)(4) and declining to address inadequately briefed argument). As a result, we do not address this issue.

Defendant has not identified any basis to disturb the family division's decision to extend the final RFA order.

Affirmed.

BY THE COURT:

Harold E. Eaton, Jr., Associate Justice

Nancy J. Waples, Associate Justice

Christina E. Nolan, Associate Justice