



(Docket No. 132627)

NANCY REYNOLDS, Appellant, v. CHRISTOPHER I. REYNOLDS SR., Appellee.
Opinion filed September 24, 2026.

Justice Holder White delivered the judgment of the court, with opinion.

This case concerns whether a parent seeking only a change to a court's allocation of parenting time must show a substantial change in circumstances or only a simple change in circumstances. Christopher Reynolds sought a modification of his parenting plan with Nancy Reynolds in 2023, seeking additional parenting time with Christopher and Nancy's two daughters. The trial court found Christopher presented a *prima facie* (initial) showing of changes since the 2016 entry of the parenting plan that would warrant modifying it in the children's best interests. However, the court found a lack of unanticipated substantial change under section 610.5(c) of the Illinois Marriage and Dissolution of Marriage Act.

The appellate court reversed. The court found that Christopher's claim should have been considered instead under section 610.5(a), which would require only changed circumstances and not a substantial change in circumstances. The supreme court affirmed the appellate court's judgment and reversed the circuit court's. Subsection (a) places stricter limits on the allocation of parental decision-making responsibilities, but a modification of a parenting time order requires only a showing of changed circumstances that necessitate modification to serve the best interests of the child.