



Remedies for the successful complaints and any issues as to apportionment between the Respondents were to be determined at a future hearing. [Frank Cranmer]

doi:10.1017/S0956618X2200093X

### **Re St Michael and All Angels, Pelsall**

Newcastle Consistory Court: Verduyn Dep Ch, 12 July 2022

[2022] ECC Lic 6

*Memorial – use of deceased’s maiden name only*

In the course of a judgment concerning a petition for a memorial in a form outside the diocesan Churchyard Regulations, the court considered whether it was permissible for the memorial to refer to the deceased only by her maiden name.

The deceased had remained in an abusive marriage until her children left home, at which point she was divorced. Thereafter, there was no consistent pattern of her reverting to her maiden name; although she used her maiden name in correspondence and had made it clear to her children that she wished to be buried under her maiden name, formal documents including the death certificate and burial register carried her married name.

The court considered the law on names, emphasising its informality. In the present case, the only real objection to the maiden name appearing alone on a memorial was the risk of confusion. This would be unlikely to arise amongst those who might visit the grave; and any risk of official confusion could be removed by adding an explanatory note to the burial register and appropriately annotating the churchyard plan. There being no legal or practical objection, a faculty would be granted accordingly. [DW]

doi:10.1017/S0956618X22000941