

UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT
OF TEXAS, HOUSTON DIVISION

Emerson Transportation Inc. d/b/a STS Logistics, Inc. v. Richard
Steve Meza, et al.

Emerson Transportation · No. Adversary No. 25-3620; Main Case No. 25-32456 · Decided June 26, 2026

SUMMARY

The United States Bankruptcy Court for the Southern District of Texas grants summary judgment to Emerson Transportation Inc. d/b/a STS Logistics, Inc. in an adversary proceeding concerning the dischargeability of a state-court judgment debt. The court holds that the debt is excepted from discharge under 11 U.S.C. § 523(a)(2)(A) because the debtors fraudulently used STS Logistics’ SCAC to obtain services for their own companies. The court declines to address alternative claims under §§ 523(a)(4) and (a)(6).

CASE DETAILS

COURT	United States Bankruptcy Court for the Southern District of Texas, Houston Division
WRITING FOR THE COURT	Marvin Isgur
JURISDICTION	United States Bankruptcy Court for the Southern District of Texas, Houston Division
DECIDED	June 26, 2026
DOCKET	Adversary No. 25-3620; Main Case No. 25-32456
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff moved for summary judgment in an adversary proceeding seeking to except a state-court judgment debt from discharge under 11 U.S.C. § 523. The bankruptcy court granted the motion as to § 523(a)(2)(A) and concluded that the debt was nondischargeable.
STANDARD OF REVIEW	Summary judgment is proper when there is no genuine dispute of material fact and the movant is entitled to judgment as a matter of law. The court views the evidence in the light most favorable to the nonmoving party, does not weigh evidence or make credibility determinations, and may not rely on conclusory allegations or unsupported assertions.

PRECEDENTIAL VALUE	Unknown; bankruptcy court memorandum opinion with no reporter citation in the source
PARTIES	Emerson Transportation Inc. d/b/a STS Logistics, Inc. v. Richard Steve Meza, Cristina Meza

TOPICS

nondischargeable debts adversary proceedings summary judgment chapter 7 commercial litigation

PRACTICE AREAS

bankruptcy commercial litigation civil procedure

QUESTIONS PRESENTED

1. Whether the state-court default judgment's findings were entitled to collateral-estoppel effect in determining dischargeability under 11 U.S.C. § 523(a)(2)(A).
2. Whether the summary-judgment record established that the Mezas incurred the state-court judgment debt through actual fraud under 11 U.S.C. § 523(a)(2)(A).
3. Whether a dispute concerning the precise amount of damages precluded summary judgment when the amount had already been determined by the state-court judgment.
4. Whether Cristina Meza's alleged lack of involvement in the fraudulent conduct prevented the debt from being excepted from discharge under § 523(a)(2)(A).

HOLDINGS

1. The state-court judgment did not establish collateral estoppel because the record did not show that the default judgment was entered after a hearing or trial at which STS Logistics met its evidentiary burden; therefore, the bankruptcy court independently considered the summary-judgment evidence.
2. The Mezas' judgment debt was obtained by actual fraud and was excepted from discharge under 11 U.S.C. § 523(a)(2)(A).
3. A dispute over the precise amount of damages did not preclude summary judgment because the state-court judgment conclusively determined the amount of the debt.
4. Cristina Meza's alleged lesser involvement did not prevent the jointly and severally owed debt from being excepted from discharge because § 523(a)(2)(A) focuses on how the debt arose, while the scope of liability is determined by applicable state law.

KEY QUOTATIONS

“The findings in the judgment do not control here. The Court must consider the evidence on the summary judgment record and determine whether actual fraud within the meaning of § 523(a)(2)(A) is established.”

“The summary judgment record establishes that STS Logistics’s injuries were foreseeable consequences of the Mezas’ fraudulent conduct.”

“The judgment debt is excepted from discharge as a matter of law under § 523(a)(2)(A).”

FACTUAL BACKGROUND

Richard Meza formerly worked for STS Logistics and had permission to use its Standard Carrier Alpha Code, or SCAC, during his employment. After forming TGZ Freight LLC and TGZ Connection LLC, the Mezas used STS Logistics's SCAC to obtain services at Port Houston and held a user account out as associated with STS Logistics's owner, resulting in vendor charges and operational restrictions against STS Logistics. A Texas state court entered a \$403,316.40 judgment against the Mezas jointly and severally, after which they filed Chapter 7 bankruptcy.

PROCEDURAL HISTORY

STS Logistics obtained a September 23, 2024, Texas state-court judgment holding Richard and Cristina Meza jointly and severally liable for \$403,316.40 and imposing a permanent injunction. The Mezas filed a Chapter 7 bankruptcy petition on May 2, 2025. STS Logistics commenced this adversary proceeding and moved for summary judgment under § 523(a)(2)(A), (a)(4), and (a)(6). The bankruptcy court found the debt nondischargeable under § 523(a)(2)(A) and did not reach the alternative claims.

DISPOSITION

other

CASES CITED

- Gorman v. Verizon Wireless Tex., L.L.C., 753 F.3d 165, 170 (5th Cir. 2014)
- Anderson v. Liberty Lobby, Inc., 477 U.S. 242, 248 (1986)
- Sossamon v. Lone Star State, 560 F.3d 316, 326 (5th Cir. 2009)
- Condrey v. SunTrust Bank, 429 F.3d 556, 562 (5th Cir. 2005)
- Little v. Liquid Air Corp., 37 F.3d 1069, 1077 n.16 (5th Cir. 1994)
- Plumhoff v. Rickard, 572 U.S. 765, 768 (2014)
- Hemphill v. State Farm Mut. Auto. Ins. Co., 805 F.3d 535, 538 (5th Cir. 2015)
- Aubrey v. Sch. Bd. of Lafayette Par., 92 F.3d 316, 318 (5th Cir. 1996)
- E.E.O.C. v. LHC Grp., Inc., 773 F.3d 688, 694 (5th Cir. 2014)
- In re Smith, 659 B.R. 500, 507–08 (Bankr. E.D. Tex. 2024)
- Grogan v. Garner, 498 U.S. 279, 284 n.11 (1991)
- In re Jones, 655 B.R. 868, 876–77 (Bankr. S.D. Tex. 2023)
- Gober v. Terra+Corp. (In re Gober), 100 F.3d 1195, 1201 (5th Cir. 1996)
- In re Pancake, 106 F.3d 1242, 1244 (5th Cir. 1997)
- In re Jenkins, 607 B.R. 270, 283 (Bankr. N.D. Tex. 2019)
- Husky Int’l Electronics Inc. v. Ritz, 578 U.S. 355, 362 (2016)
- Auction Credit Enters, LLC v. Desouza (In re Desouza), 659 B.R. 288, 296 (Bankr. E.D. Tex. 2024)

- In re Selenberg, 856 F.3d 393, 398 (5th Cir. 2017)
- First Nat'l Bank of Omaha v. O'Brien (In re O'Brien), 555 B.R. 771, 782–83 (Bankr. D. Kan. 2016)
- Heckert v. Dotson (In re Heckert), 272 F.3d 253, 259 (4th Cir. 2001)
- In re Bulic, 997 F.2d 299, 304 (7th Cir. 1993)
- Bartenwerfer v. Buckley, 598 U.S. 69, 72, 75–76, 81–84 (2023)

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