

TEXAS COURT OF APPEALS, FOURTH DISTRICT, SAN ANTONIO

Wendy Padilla-Madden v. Cristian Sandoval

No. 04-25-00303-CV · No. 04-25-00303-CV · Decided March 11, 2026

SUMMARY

The Fourth Court of Appeals of Texas affirmed the denial of Wendy Padilla-Madden’s special appearance in Cristian Sandoval’s breach-of-oral-agreement suit. The court held that Madden purposefully availed herself of Texas through her activities as trustee and that Sandoval’s claim related to those contacts, supporting the exercise of specific personal jurisdiction.

CASE DETAILS

|                       |                                                                                                                                                                                                                                                                                                                                                                 |
|-----------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| COURT                 | Texas Court of Appeals, Fourth District, San Antonio                                                                                                                                                                                                                                                                                                            |
| WRITING FOR THE COURT | Velia J. Meza; Rebeca C. Martinez, Chief Justice; Adrian A. Spears II, Justice; Velia J. Meza, Justice                                                                                                                                                                                                                                                          |
| JURISDICTION          | Texas Court of Appeals, Fourth District, San Antonio                                                                                                                                                                                                                                                                                                            |
| DECIDED               | March 11, 2026                                                                                                                                                                                                                                                                                                                                                  |
| DOCKET                | 04-25-00303-CV                                                                                                                                                                                                                                                                                                                                                  |
| DISPOSITION           | affirmed                                                                                                                                                                                                                                                                                                                                                        |
| PROCEDURAL POSTURE    | Interlocutory appeal from the denial of appellant's special appearance challenging personal jurisdiction.                                                                                                                                                                                                                                                       |
| STANDARD OF REVIEW    | Denial of a special appearance is reviewed de novo. When the trial court does not issue findings of fact and conclusions of law, the appellate court implies all relevant facts necessary to support the judgment that are supported by the evidence. If conflicting evidence raises a fact issue, the appellate court upholds the trial court's determination. |
| PRECEDENTIAL VALUE    | published                                                                                                                                                                                                                                                                                                                                                       |
| PARTIES               | Wendy Padilla-Madden v. Cristian Sandoval                                                                                                                                                                                                                                                                                                                       |

TOPICS

- personal jurisdiction
- interlocutory appeal
- appellate procedure
- breach of contract
- contracts

PRACTICE AREAS

## QUESTIONS PRESENTED

1. Whether the trial court erred in denying Madden's special appearance because she did not purposefully avail herself of the privilege of conducting activities in Texas.
2. Whether Sandoval's breach-of-contract claim arose from or related to Madden's contacts with Texas for purposes of specific personal jurisdiction.
3. Whether exercising specific personal jurisdiction over Madden comported with fair play and substantial justice.

## HOLDINGS

1. Madden purposefully availed herself of the privilege of conducting activities in Texas through her contacts as trustee, including attending meetings, executing the Gan Shares Trust Agreement, and taking possession of trust-related stock in Texas.
2. Sandoval's breach-of-contract claim arose from or related to Madden's Texas contacts, satisfying the relatedness requirement for specific personal jurisdiction.
3. Exercising specific personal jurisdiction over Madden in Texas would not offend traditional notions of fair play and substantial justice.

## KEY QUOTATIONS

*“Specific jurisdiction exists when a nonresident’s more limited contacts purposefully availed them of the privilege of conducting activities within the state and the claims brought against the nonresident arise from or relate to such limited contacts.” (at 3)*

*“The “arises out of or relates to” standard provides two avenues for which a nonresident’s contacts can relate to the underlying suit.” (at 5)*

*“The nonresident would have to present “a compelling case that the presence of some consideration would render jurisdiction unreasonable,”” (at 6)*

## FACTUAL BACKGROUND

Sandoval, a Texas resident, alleged that he and Madden, an Alabama resident, entered into an oral agreement under which Madden would pay him half of her compensation if she obtained an appointment as trustee. Madden was appointed trustee of the Gan Shares Trust, traveled to San Antonio for meetings and execution of the trust agreement, and took possession of trust-related stock in a San Antonio safe-deposit box. Madden later paid Sandoval \$500,000 after receiving \$1,000,000 in trustee compensation, although she claimed the payment was for a marketing study that never occurred. Sandoval sued for breach of the oral agreement and sought \$350,000.

## PROCEDURAL HISTORY

Cristian Sandoval sued Wendy Padilla-Madden in the 73rd Judicial District Court of Bexar County for allegedly breaching an oral agreement to share trustee compensation. Madden filed a special appearance challenging general and specific personal jurisdiction. The trial court denied the special appearance, and Madden brought an interlocutory appeal. The court of appeals affirmed.

## DISPOSITION

affirmed

## CASES CITED

- M & F Worldwide Corp. v. Pepsi-Cola Metro. Bottling Co., Inc., 512 S.W.3d 878, 885 (Tex. 2017)
- Moncrief Oil International Inc. v. OAO Gazprom, 414 S.W.3d 142, 150, 152 (Tex. 2013)
- State v. Volkswagen Aktiengesellschaft, 669 S.W.3d 399, 413, 432 (Tex. 2023)
- BMC Software Belgium, N.V. v. Marchand, 83 S.W.3d 789, 795 (Tex. 2002)
- International Shoe Co. v. State of Washington, International Shoe Co. v. Washington, 326 U.S. 310, 316 (1945)
- Luciano v. SprayFoamPolymers.com, LLC, 625 S.W.3d 1, 8-9, 14, 18 (Tex. 2021)
- Ford Motor Co. v. Mont. Eighth Jud. Dist. Ct., 592 U.S. 351, 359, 362 (2021)
- Witty Yeti, LLC v. Plummer, No. 04-22-00075-CV, 2022 WL 3046942, at \*6 (Tex. App.—San Antonio Aug. 3, 2022, no pet.) (mem. op.)
- Kelly v. Gen. Interior Const., Inc., 301 S.W.3d 653, 658 (Tex. 2010)
- Hanson, Executrix, et al. v. Denckla et al., Hanson v. Denckla, 357 U.S. 235, 253 (1958)
- Ross F. Meriwether & Assocs., Inc. v. Aulbach, 686 S.W.2d 730, 732 (Tex. App.—San Antonio 1985, no writ)
- Jerome I. Wright & Assocs., Inc. v. First Metro Ltd. P'ship, No. 03-04-00283-CV, 2004 WL 2186330, at \*6 (Tex. App.—Austin Sept. 30, 2004, no pet.) (mem. op.)
- Moki Mac River Expeditions v. Drugg, 221 S.W.3d 569, 585-86 (Tex. 2007)
- Guardian Royal Exch. Assur., Ltd. v. English China Clays, P.L.C., 815 S.W.2d 223, 231 (Tex. 1991)
- World-Wide Volkswagen Corp. v. Woodson, 444 U.S. 286, 292 (1980)
- McGee v. Int'l Life Ins. Co., 355 U.S. 220, 223 (1957)