

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF  
TEXAS, AUSTIN DIVISION

Robert, formerly known as William Bowman v. State of Texas Vital  
Statistics Registrar Office

Robert · No. 1:25-CV-00381-DAE · Decided November 21, 2025

SUMMARY

The United States District Court for the Western District of Texas adopted a magistrate judge's Report and Recommendation and dismissed Robert's pro se complaint against the State of Texas Vital Statistics Registrar Office for lack of subject-matter jurisdiction. The court overruled Robert's objections, found that the complaint presented neither a federal question nor alleged diversity jurisdiction, and directed the Clerk to close the case.

CASE DETAILS

|                    |                                                                                                                                                                                                                                                                     |
|--------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| COURT              | United States District Court for the Western District of Texas, Austin Division                                                                                                                                                                                     |
| JURISDICTION       | United States District Court for the Western District of Texas, Austin Division                                                                                                                                                                                     |
| DECIDED            | November 21, 2025                                                                                                                                                                                                                                                   |
| DOCKET             | 1:25-CV-00381-DAE                                                                                                                                                                                                                                                   |
| DISPOSITION        | dismissed                                                                                                                                                                                                                                                           |
| PROCEDURAL POSTURE | The district court reviewed a magistrate judge's Report and Recommendation after the pro se plaintiff filed general objections. The court applied clear-error review, adopted the Report in full, and dismissed the action for lack of subject matter jurisdiction. |
| STANDARD OF REVIEW | Clear-error review applies to findings and recommendations to which no specific, genuine objection is made; de novo review applies to conclusions specifically objected to.                                                                                         |
| PRECEDENTIAL VALUE | Unknown; district-court order with no reporter citation                                                                                                                                                                                                             |

TOPICS

- subject matter jurisdiction
- civil procedure

PRACTICE AREAS

## QUESTIONS PRESENTED

1. Whether the plaintiff's general objections to the magistrate judge's Report and Recommendation required de novo review.
2. Whether the complaint established federal subject matter jurisdiction over the plaintiff's request to change or revert his legal name and birth-certificate records.

## HOLDINGS

1. General objections that do not specifically identify an alleged factual or legal error do not require de novo review; the district court may review the unobjected-to recommendations for clear error or whether they are contrary to law.
2. The complaint did not establish federal subject matter jurisdiction because it presented no federal question and did not allege diversity jurisdiction; the action was therefore dismissed.

## KEY QUOTATIONS

*“The Magistrate Judge correctly concluded that this Court lacks jurisdiction.”* (at 2–4)

*“The Court finds that Plaintiff’s objections do not identify any specific factual error or legal misapplication warranting rejection of the Magistrate Judge’s conclusions.”* (at 2–4)

## FACTUAL BACKGROUND

Robert alleged that his name had been changed when he was a child and sought to revert to the name given at birth. He sought no monetary relief and characterized the requested relief as rescission or annulment of the legally changed name and birth-certificate record. The complaint did not present a federal question and did not allege facts establishing diversity jurisdiction.

## PROCEDURAL HISTORY

Robert filed a pro se complaint on March 14, 2025, seeking to revert to his birth name and amend or rescind the associated name-change and birth-certificate records. The magistrate judge granted in forma pauperis status and recommended dismissal under 28 U.S.C. § 1915(e) because the complaint did not present a federal question and did not allege diversity jurisdiction. Robert filed objections on April 10, 2025, but the district court found them general and non-specific, adopted the Report and Recommendation, dismissed all claims, and directed the Clerk to close the case.

## DISPOSITION

dismissed

## CASES CITED

- *Battle v. United States Parole Commission*, 834 F.2d 419, 421 (5th Cir. 1987)

- Thomas v. Arn, 474 U.S. 140, 151 (1985)
- United States v. Wilson, 864 F.2d 1219, 1221 (5th Cir. 1989)

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