

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)

OPINION

UNITED STATES DISTRICT COURT WESTERN DISTRICT OF TEXAS AUSTIN DIVISION
 ROBERT, formerly known as § No. 1:25-CV-00381-DAE WILLIAM BOWMAN, § § Plaintiff, §
 § vs. § § STATE OF TEXAS VITAL § STATISTICS REGISTRAR OFFICE. § § Defendant. §
 ORDER Before the Court is the Report and Recommendation (“Report”) filed by U.S. Magistrate
 Judge Mark Lane on March 31, 2025.

(Dkt # 4.) The Report granted Plaintiff Robert’s (“Plaintiff” or “Robert”) application to proceed in
 forma pauperis and reviewed is pro se Complaint under 28 U.S.C. § 1915(e). The Magistrate
 Judge recommended dismissing all of Robert’s claims for lack of subject matter jurisdiction. (Dkt.
 # 4 at 2–4.) Robert filed objections to the Report on April 10, 2025.

(Dkt. # 7.) The Court finds this matter suitable for disposition without a hearing. First, after clear
 error review of Robert’s objections to the Report¹, as well as 1 Robert’s objections do not point to
 any specific error in the Report’s analysis. Instead, the objections seem to acknowledge the court’s
 lack of jurisdiction and Plaintiff suggests he seeks to “start over the right way.” Such “frivolous,
 careful consideration of the record and the governing law, the Court ADOPTS the Report in full as
 the opinion of the Court.

(Dkt. # 4.) Accordingly, the Court DISMISSES all of Plaintiff’s claims against Defendant for lack
 of subject matter jurisdiction. BACKGROUND On March 14, 2025, Robert filed a Complaint
 against Defendant State of Texas Vital Statistics Registrar Office, seeking to change his name.
 (Dkt. # 1.) He claims his name was changed when he was a child, and he seeks to revert to his
 name given at birth.

(Id.) Plaintiff seeks no monetary penalty and is “simply seeking a rescission/annulment of the
 legally changed name and birth certificate contract.” (Dkt. # 1 at 4.) Magistrate Judge Lane
 recommended the case be dismissed for lack of jurisdiction because the case does not present a
 federal question and diversity jurisdiction is not alleged in the complaint.

(Dkt. # 4.) LEGAL STANDARD I. Review of Report and Recommendation The Court must
 conduct a de novo review of any of the Magistrate Judge’s conclusions to which a party has
 specifically objected. See 28 U.S.C. conclusive, or general objections” do not merit de novo
 review. Battle v. United States Parole Comm’n, 834 F.2d 419, 421 (5th Cir.1987).

Here, the Court finds that Robert’s objections lack merit as they do not object to anything in the
 Report. Accordingly, the Court applies a clear-error standard of review. § 636(b)(1)(C). The
 objections must specifically identify those findings or recommendations that the party wishes to
 have the district court consider. Thomas v. Arn, 474 U.S. 140, 151 (1985).

A district court need not consider “[f]rivolous, conclusive, or general objections.” *Battle v. U.S. Parole Comm’n*, 834 F.2d 419, 421 (5th Cir. 1987). “A judge of the court may accept, reject, or modify, in whole or in part, the findings or recommendations made by the magistrate judge.” 28 U.S.C. § 636(b)(1)(C). Findings to which no specific, genuine objections are made do not require de novo review; the Court need only determine whether the Recommendation is clearly erroneous or contrary to law.

See *United States v. Wilson*, 864 F.2d 1219, 1221 (5th Cir. 1989). DISCUSSION Having reviewed the Report and Recommendation, the relevant filings, and the applicable law, the Court finds no error in Judge Lane’s well- reasoned analysis. Plaintiff’s objections to the Report do not challenge any specific findings. (Dkt. # 5.) Plaintiff merely generally alleges that “in equity the name change should not have happened” and appears to admit that “[i]f theres [sic] nothing that can be done through the courts the Lord may need to sort it out.” (Id.)

The Magistrate Judge correctly concluded that this Court lacks jurisdiction over this matter. Even affording Plaintiff the full benefit of his pro se status, his objections raise no new arguments of substance. A district court need not consider “Tf]rivolous, conclusive, or general objections.” *Battle*, 834 F.2d at 421.

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. Accordingly, the Court OVERRULES Plaintiff’s objections. (Dkt. #7.)

The Report is ADOPTED in full. CONCLUSION For the reasons given, the Court ADOPTS U.S. Magistrate Judge Lane’s Report and Recommendation (Dkt. # 4) in full and DISMISSES under all claims against Defendant for lack of subject matter jurisdiction.

The Clerk is INSTRUCTED to CLOSE THE CASE. IT IS SO ORDERED. DATED: Austin, Texas, November 21, 2025. 4 Senior U.S. District Judge