

TEXAS COURT OF APPEALS, THIRD DISTRICT AT AUSTIN

Nylondraleshannette Williams-James v. Kenneth Ray James

No. 03-25-00407-CV · No. No. 03-25-00407-CV · Decided March 17, 2026

SUMMARY

The Texas Court of Appeals for the Third District abated the appeal and remanded the matter to the trial court to resolve disputes concerning the completeness of the reporter’s record and whether certain exhibits were admitted into evidence. The trial court must conduct any required notice and hearing and provide a supplemental reporter’s record by April 16, 2026, after which the appeal will be reinstated.

CASE DETAILS

COURT	Texas Court of Appeals, Third District at Austin
WRITING FOR THE COURT	Per Curiam; Chief Justice Byrne; Justice Theofanis; Justice Crump
JURISDICTION	Texas Court of Appeals, Third District at Austin
DECIDED	March 17, 2026
DOCKET	No. 03-25-00407-CV
DISPOSITION	remanded
PROCEDURAL POSTURE	Interlocutory appellate order abating the appeal and remanding the matter to the trial court to resolve disputes concerning the completeness and accuracy of the appellate record.
PRECEDENTIAL VALUE	Published
PARTIES	Nylondraleshannette Williams-James v. Kenneth Ray James

TOPICS

- appellate procedure
- family law procedure
- evidence
- civil procedure

PRACTICE AREAS

- Family law
- Appellate procedure
- Evidence

QUESTIONS PRESENTED

1. Whether the appellate court should submit disputes concerning the completeness of the reporter's record and the admission of exhibits to the trial court for resolution.

2. What procedure the trial court must follow if the parties disagree about how to correct the appellate record.

HOLDINGS

1. When a dispute concerning the reporter's record arises after the record has been filed in the appellate court, the appellate court may submit the dispute to the trial court for resolution under Texas Rule of Appellate Procedure 34.6(e)(3).
2. If the parties disagree about whether or how to correct the record, the trial court must provide notice and a hearing, settle the dispute, and, if it finds an inaccuracy, order the court reporter to conform the reporter's record and file certified corrections in the appellate court.

KEY QUOTATIONS

“When, as here, a “dispute arises after the reporter’s record has been filed in the appellate court, that court may submit the dispute to the trial court for resolution.””

“If the parties disagree on whether or how to correct the record so that it is complete and the exhibits are accurate, “the trial court must—after notice and hearing—settle the dispute. If the court finds any inaccuracy, it must order the court reporter to conform the reporter’s record (including text and any exhibits) to what occurred in the trial court, and to file certified corrections in the appellate court.””

FACTUAL BACKGROUND

The appellant contended that the reporter's record remained incomplete and disputed whether certain exhibits in a supplemental volume of the clerk's record had been admitted into evidence. The appellate court determined that resolving those factual record disputes was a matter for the trial court.

PROCEDURAL HISTORY

Williams-James appealed from proceedings in the 426th District Court of Bell County and was granted five extensions to file her pro se brief. During the extension period, she filed motions challenging the completeness of the reporter's record and whether certain exhibits in a supplemental clerk's-record volume had been admitted. The court of appeals abated the appeal and remanded the record dispute to the trial court for resolution under Texas Rule of Appellate Procedure 34.6(e).

DISPOSITION

remanded

REMAND INSTRUCTIONS

The trial court must resolve whether the reporter's record is complete and whether the disputed exhibits were admitted. If the parties disagree about whether or how to correct the record, the trial court must provide notice and a hearing, settle the dispute, order any necessary corrections, and cause certified corrections to be filed in the

appellate court. A supplemental reporter's record containing the trial court's determination must be filed by April 16, 2026. The appeal will be reinstated after the supplemental reporter's record is filed.

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