

SUPREME COURT OF ALABAMA

Ex parte Alabama-West Florida Conference of the United Methodist Church, Inc., and the Board of Trustees of the Alabama-West Florida Conference of the United Methodist Church, Inc.

Ex parte Alabama-West Florida Conference of the United Methodist Church, Inc., Nos. SC-2025-0347, SC-2025-0361, SC-2025-0367, SC-2025-0426, SC-2025-0431, SC-2025-0439, SC-2025-0442, SC-2025-0445, SC-2025-0462, SC-2025-0483, SC-2025-0514, SC-2025-0543, SC-2025-0643, SC-2025-0720, SC-2025-0851 (Ala. Mar. 6, 2026) · No. SC-2025-0347; SC-2025-0361; SC-2025-0367; SC-2025-0426; SC-2025-0431; SC-2025-0439; SC-2025-0442; SC-2025-0445; SC-2025-0462; SC-2025-0483; SC-2025-0514; SC-2025-0543; SC-2025-0643; SC-2025-0720; SC-2025-0851 · Decided March 6, 2026

SUMMARY

The Alabama Supreme Court consolidated 15 petitions for writs of mandamus arising from church-property quiet-title actions. The court held that mandamus review was appropriate because the petitions presented subject-matter-jurisdiction issues involving the ecclesiastical-abstention doctrine and the potential waste of judicial and litigant resources. The opinion addresses whether the Conference's counterclaims could be resolved under neutral principles of law rather than dismissed as ecclesiastical disputes.

CASE DETAILS

COURT	Supreme Court of Alabama
WRITING FOR THE COURT	Sellers, Justice; Sellers, J.; Cook, J.; McCool, J.; Edwards, Special Justice; Minor, Special Justice; Bryan, Acting C.J.; Mendheim, J.
JURISDICTION	Supreme Court of Alabama
DECIDED	March 6, 2026
DOCKET	SC-2025-0347; SC-2025-0361; SC-2025-0367; SC-2025-0426; SC-2025-0431; SC-2025-0439; SC-2025-0442; SC-2025-0445; SC-2025-0462; SC-2025-0483; SC-2025-0514; SC-2025-0543; SC-2025-0643; SC-2025-0720; SC-2025-0851
DISPOSITION	writ_granted
PROCEDURAL POSTURE	Consolidated petitions for writs of mandamus challenging trial-court orders granting motions to dismiss the Conference's and its board of trustees' counterclaims for lack of subject-matter jurisdiction.

STANDARD OF REVIEW	Mandamus is available when the petitioner has a clear legal right, the respondent has an imperative duty accompanied by a refusal to perform it, no other adequate remedy exists, and jurisdiction is properly invoked. Subject-matter-jurisdiction issues are reviewable by mandamus, and the availability of an eventual appeal does not necessarily make that remedy adequate.
PRECEDENTIAL VALUE	Published Alabama Supreme Court opinion; precedential, subject to formal revision.
PARTIES	Alabama-West Florida Conference of the United Methodist Church, Inc., Board of Trustees of the Alabama-West Florida Conference of the United Methodist Church, Inc. v. Mt. Zion of Autauga County, Inc., Coffeetown Methodist Church, Armstrong Methodist Church, Daleville First Methodist Church, United Methodist Church Westview Heights, Inc., Ham Chapel Methodist Church, Crawford Methodist Church, Elba United Methodist Church, Inc., Highland Park Methodist Church of Dothan, Baggett Chapel United Methodist Church, Pleasant Hill Methodist Church, Trinity United Methodist Church, Gold Hill Methodist Church, Sunflower United Methodist Church, Inc., Theodore United Methodist Church

TOPICS

writ of certiorari

subject matter jurisdiction

appellate procedure

quiet title

real estate

PRACTICE AREAS

appellate procedure

civil procedure

constitutional law

real property

trusts

church-property disputes

QUESTIONS PRESENTED

1. Whether mandamus is an appropriate procedural vehicle to review interlocutory orders dismissing counterclaims based on alleged lack of subject-matter jurisdiction when the underlying quiet-title actions remain pending.
2. Whether the ecclesiastical-abstention doctrine deprived the trial courts of authority to adjudicate the Conference's and board of trustees' counterclaims concerning ownership of church property.
3. Whether the counterclaims could be resolved under neutral principles of law by examining deeds, corporate documents, trust provisions, statutes, and other secular property materials without resolving religious doctrine or ecclesiastical matters.

HOLDINGS

1. Mandamus may be used to review the trial courts' interlocutory dismissals of the counterclaims because the dismissals concerned subject-matter jurisdiction and an eventual appeal would not provide an

adequate remedy while the local churches' quiet-title claims continued toward litigation.

2. The ecclesiastical-abstention doctrine did not deprive the trial courts of authority to adjudicate the counterclaims because the counterclaims presented competing claims to real property that could be resolved using neutral principles of property and trust law rather than by deciding religious doctrine, practice, or internal governance.
3. The trial courts erred by dismissing the Conference's and board of trustees' counterclaims because quiet-title actions contemplate adjudicating competing ownership interests and allow defendants asserting an interest in the property to present their own claims and evidence.

KEY QUOTATIONS

“Simply because an issue implicated by an interlocutory order can eventually be raised on appeal does not mean that it cannot be raised in a mandamus petition.” (at 18)

“Mandamus is an extraordinary writ that will issue ” ‘where there is (1) a clear legal right in the petitioner to the order sought; (2) an imperative duty upon the respondent to perform, accompanied by a refusal to do so; (3) the lack of another adequate remedy; and (4) properly invoked jurisdiction of the court.’” (at 20)

“The dismissal orders were inappropriate in actions seeking to quiet title, in which the issue to be decided is the ownership of property among competing claimants.” (at 30)

FACTUAL BACKGROUND

Fifteen local United Methodist congregations claimed ownership of real property used for worship and related activities and filed quiet-title actions against the Alabama-West Florida Conference and its board of trustees. The Conference and board asserted competing ownership and trust claims based principally on deeds, corporate documents, trust provisions, and provisions of the United Methodist Church's Book of Discipline. The trial courts dismissed those counterclaims as ecclesiastical matters, although the local churches' quiet-title claims remained pending.

PROCEDURAL HISTORY

Fifteen local United Methodist congregations filed quiet-title actions concerning church property. The Conference and its board of trustees filed counterclaims seeking declarations that the property was owned by the board or held in trust for the board or Conference. The trial courts dismissed the counterclaims based on the ecclesiastical-abstention doctrine and alleged lack of subject-matter jurisdiction while allowing the local churches' quiet-title claims to remain pending. The Supreme Court of Alabama consolidated the mandamus petitions and granted relief.

DISPOSITION

writ_granted

REMAND INSTRUCTIONS

The trial courts are directed to vacate the orders dismissing the Conference's and board of trustees' counterclaims.

CASES CITED

- Ex parte Alabama-W. Fla. Conf. of United Methodist Church, Inc., 401 So. 3d 1123 (Ala. 2024) (Harvest Church)
- Ex parte Liberty Nat'l Life Ins. Co., 888 So. 2d 478 (Ala. 2003)
- Ex parte Foremost Ins. Co., 403 So. 3d 142 (Ala. 2024)
- Ex parte Hodge, 153 So. 3d 734 (Ala. 2014)
- Ex parte Cassimus, No. SC-2024-0284 (Ala. Mar. 7, 2025)
- Ex parte Lindsey, 298 So. 3d 1061 (Ala. 2020)
- Ex parte Owens, 533 So. 2d 617 (Ala. 1988)
- Ex parte Hoye, 324 So. 3d 1271 (Ala. Civ. App. 2020)
- Ex parte Jones, 896 So. 2d 553 (Ala. Civ. App. 2004)
- Ex parte Volkswagenwerk Aktiengesellschaft, 443 So. 2d 880 (Ala. 1983)
- Presbyterian Church in the United States v. Mary Elizabeth Blue Hull Mem'l Presbyterian Church, 393 U.S. 440 (1969)
- Jones v. Wolf, 443 U.S. 595 (1979)
- Trinity Presbyterian Church of Montgomery v. Tankersley, 374 So. 2d 861 (Ala. 1979)
- Haney's Chapel United Methodist Church v. United Methodist Church, 716 So. 2d 1156 (Ala. 1998)
- Ex parte Central Alabama Conf., African Methodist Episcopal Zion Church in Am., 860 So. 2d 865 (Ala. 2003)
- Aldersgate United Methodist Church of Montgomery v. Alabama-W. Fla. Conf. of United Methodist Church, Inc., 411 So. 3d 328 (Ala. 2024)
- Pogue v. White Stone Baptist Church, 554 So. 2d 981 (Ala. 1989)
- Serbian E. Orthodox Diocese for the United States & Canada v. Milivojevich, 426 U.S. 696 (1976)