

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., SC-2025-0347, et al. (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 Supreme Court of Alabama consolidated 15 petitions for writs of mandamus brought by the Alabama-West Florida Conference of the United Methodist Church and its board of trustees. The petitions challenged trial-court orders dismissing counterclaims concerning ownership or trusts in church real property on ecclesiastical-abstention grounds. The court held that mandamus review was appropriate under the circumstances and issued writs directing the trial courts to vacate the dismissal orders.

CASE DETAILS

COURT	Supreme Court of Alabama
WRITING FOR THE COURT	Sellers, Justice; Cook, Justice; McCool, Justice; Edwards, Special Justice; Minor, Special Justice; Bryan, Acting Chief Justice; Mendheim, Justice
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	The Conference and its board of trustees petitioned the Supreme Court of Alabama for writs of mandamus directing 15 circuit courts to vacate orders dismissing their counterclaims in church-property quiet-title actions. The petitions were consolidated, and the Supreme Court granted each petition and issued the writ.

STANDARD OF REVIEW	Mandamus is available when the petitioner demonstrates a clear legal right to the requested order, an imperative duty accompanied by a refusal to perform it, the lack of another adequate remedy, and properly invoked jurisdiction. Subject-matter-jurisdiction issues are generally reviewable by mandamus, and the availability of a later appeal does not categorically make mandamus unavailable when the appellate remedy is inadequate under the circumstances.
PRECEDENTIAL VALUE	Published Alabama Supreme Court opinion; reporter citation pending formal publication.
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., Coffeerville 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

quiet title

real estate

first amendment

PRACTICE AREAS

appellate procedure

civil procedure

real property

constitutional law

religious organizations

trusts

QUESTIONS PRESENTED

1. Whether mandamus was an available procedural vehicle to review interlocutory orders dismissing counterclaims for lack of subject-matter jurisdiction.
2. Whether the ecclesiastical-abstention doctrine deprived the trial courts of subject-matter jurisdiction over the Conference's and board's counterclaims seeking to establish interests in church real property.
3. Whether the counterclaims could be adjudicated under neutral principles of law without resolving religious doctrine, practice, or internal church governance.

HOLDINGS

1. Mandamus review is not categorically barred merely because the challenged order grants a motion to dismiss or because the issue could eventually be raised on appeal. In these cases, mandamus was appropriate because the orders dismissed only the counterclaims, the underlying quiet-title actions

remained pending, and waiting for final judgment risked substantial waste of judicial and litigant resources.

2. The trial courts erred in dismissing the Conference's and board's counterclaims for lack of subject-matter jurisdiction. Church-property disputes may be adjudicated under neutral principles of law when resolution requires examination of secular property and trust materials rather than determination of religious doctrine, practice, or internal governance.

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.” (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.’” (20-21)

“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.” (30)

FACTUAL BACKGROUND

Fifteen local United Methodist churches occupied and used real property for worship and related activities. Each church brought a quiet-title action, while the Conference and its board of trustees asserted competing ownership or trust interests through counterclaims based primarily on deeds, corporate documents, trust provisions, and related property materials. The trial courts dismissed the counterclaims on the ground that the ecclesiastical-abstention doctrine deprived them of subject-matter jurisdiction.

PROCEDURAL HISTORY

Fifteen local United Methodist congregations filed quiet-title actions concerning church property. The Conference and its board of trustees filed counterclaims asserting ownership or trust interests in the property. The local churches moved to dismiss the counterclaims for lack of subject-matter jurisdiction under the ecclesiastical-abstention doctrine, and the circuit courts granted those motions. The Conference and board then sought mandamus relief in the Alabama Supreme Court.

DISPOSITION

writ_granted

REMAND INSTRUCTIONS

The circuit courts were directed to vacate their orders dismissing the Conference's and board's counterclaims.

CASES CITED

- Ex parte Alabama-W. Fla. Conf. of United Methodist Church, Inc., 401 So. 3d 1123 (Ala. 2024)

- 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, Ms. SC-2024-0284, Mar. 7, 2025
- Ex parte Lindsey, 298 So. 3d 1061 (Ala. 2020)
- Ex parte Owens, 533 So. 2d 617 (Ala. 1988)
- Ex parte Volkswagenwerk Aktiengesellschaft, 443 So. 2d 880 (Ala. 1983)
- Ex parte Moore, 382 So. 2d 548 (Ala. 1980)
- Presbyterian Church in the United States v. Mary Elizabeth Blue Hull Mem'l Presbyterian Church, 393 U.S. 440 (1969)
- Maryland & Virginia Eldership of the Churches of God v. Church of God at Sharpsburg, Inc., 396 U.S. 367 (1970)
- Trinity Presbyterian Church of Montgomery v. Tankersley, 374 So. 2d 861 (Ala. 1979)
- Jones v. Wolf, 443 U.S. 595 (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)
- Pogue v. White Stone Baptist Church, 554 So. 2d 981 (Ala. 1989)
- Aldersgate United Methodist Church of Montgomery v. Alabama-West Florida Conference of United Methodist Church, Inc., 411 So. 3d 328 (Ala. 2024)