

SUPREME COURT OF ALABAMA

Jordan Ray Henshaw v. State of Alabama

Henshaw · No. SC-2025-0535 · Decided February 20, 2026

SUMMARY

The Supreme Court of Alabama addresses consolidated appeals arising from a Madison Circuit Court writ of mandamus concerning protection-from-abuse and domestic-violence proceedings involving Jordan Ray Henshaw. The Court dismisses Judge Linda F. Coats's appeal for lack of standing and dismisses Henshaw's appeal in part, transferring it to the Court of Criminal Appeals. The opinion also discusses the authority to conduct a pretrial hearing under Alabama's stand-your-ground immunity statute.

CASE DETAILS

COURT	Supreme Court of Alabama
WRITING FOR THE COURT	Mendheim, Justice; Stewart, C.J.; Bryan, J.; McCool, J.; Shaw, J.
JURISDICTION	Supreme Court of Alabama
DECIDED	February 20, 2026
DOCKET	SC-2025-0535
DISPOSITION	dismissed
PROCEDURAL POSTURE	Separate appeals from a Madison Circuit Court order granting the State's petition for writs of mandamus against Judges Linda F. Coats and Patricia D. Demos. The Supreme Court of Alabama dismissed Judge Coats's appeal, dismissed the portion of Henshaw's appeal concerning the writ directed to Judge Coats, and transferred the remaining portion of Henshaw's appeal concerning the criminal case to the Court of Criminal Appeals.
STANDARD OF REVIEW	De novo review applies to a circuit court's issuance of a writ of mandamus when the issues presented are questions of law and the facts are undisputed.
PRECEDENTIAL VALUE	Published
PARTIES	Linda F. Coats, Jordan Ray Henshaw v. State of Alabama

TOPICS

appellate jurisdiction

standing

writ of certiorari

appellate procedure

criminal procedure

PRACTICE AREAS

appellate procedure

criminal procedure

family law

statutory interpretation

QUESTIONS PRESENTED

1. Whether Judge Coats had standing to appeal the Madison Circuit Court's mandamus order.
2. Whether the Madison Circuit Court had supervisory jurisdiction to issue a writ of mandamus directing Judge Coats, who was acting as a special circuit judge, to vacate part of her PFA order.
3. Whether the portion of Henshaw's appeal challenging the mandamus order directed to Judge Coats could proceed when that order was void.
4. Whether Henshaw's appeal challenging the mandamus order directed to District Judge Demos in the criminal case belonged in the Supreme Court of Alabama or the Court of Criminal Appeals.

HOLDINGS

1. Judge Coats lacked standing to appeal the mandamus order because she had no personal, legally protected interest or injury in fact resulting from the order.
2. A circuit court lacks supervisory jurisdiction to issue a writ of mandamus directing a judge acting as a special circuit judge to vacate an order entered in that capacity.
3. The mandamus order directing Judge Coats to vacate part of her PFA order was void, and neither Judge Coats's nor Henshaw's appeal from that portion of the order could proceed.
4. Henshaw's appeal concerning the mandamus order directing District Judge Demos to vacate the dismissal of the criminal case belongs in the Court of Criminal Appeals.

KEY QUOTATIONS

“Circuit courts do not have supervisory jurisdiction over one another.” (22)

“SC-2025-0493 -- APPEAL DISMISSED. SC-2025-0535 -- APPEAL DISMISSED IN PART AND TRANSFERRED.” (28)

FACTUAL BACKGROUND

Mikaela Williams filed a protection-from-abuse petition alleging that Henshaw had assaulted her during an altercation. Linda F. Coats, a district judge sitting as a specially appointed circuit judge, presided over the PFA proceeding and conducted a pretrial hearing under Alabama's stand-your-ground immunity statute, finding Henshaw immune from criminal prosecution and civil action. Patricia D. Demos, the district judge presiding over the related domestic-violence prosecution, relied on Coats's order and dismissed the criminal charge. The Madison Circuit Court later issued writs of mandamus directing both judges to vacate their orders.

PROCEDURAL HISTORY

Williams filed a protection-from-abuse petition against Henshaw in Madison Circuit Court. Special Circuit Judge Coats conducted a statutory immunity hearing in the PFA case and entered an order finding Henshaw immune from criminal prosecution and civil action; District Judge Demos then dismissed the related domestic-violence charge. The Madison Circuit Court granted the State's mandamus petition, ordering Coats to vacate the immunity ruling and Demos to vacate the dismissal and restore the criminal case. Coats and Henshaw separately appealed.

DISPOSITION

dismissed

REMAND INSTRUCTIONS

The appeal in SC-2025-0535 concerning the mandamus order directed to Judge Demos was transferred to the Court of Criminal Appeals. No remand instructions were issued to the Madison Circuit Court.

CASES CITED

- Ex parte A.S., 3 So. 3d 842 (Ala. 2008)
- Regions Bank v. Reed, 60 So. 3d 868 (Ala. 2010)
- George v. Sims, 888 So. 2d 1224 (Ala. 2004)
- Davis v. American Pride Properties, LLC, 411 So. 3d 1220 (Ala. 2024)
- Nunn v. Baker, 518 So. 2d 711 (Ala. 1987)
- Ex parte BAC Home Loans Servicing, LP, 159 So. 3d 31 (Ala. 2013)
- State v. Property at 2018 Rainbow Drive, 740 So. 2d 1025 (Ala. 1999)
- Ex parte Aull, 149 So. 3d 582 (Ala. 2014)
- Alabama Alcoholic Beverage Control Board v. Henri-Duval Winery, L.L.C., 890 So. 2d 70 (Ala. 2003)
- Ex parte Alabama Educational Television Commission, 151 So. 3d 283 (Ala. 2013)
- Concrete Pipe & Products of California, Inc. v. Construction Laborers Pension Trust for Southern California, 508 U.S. 602 (1993)
- Ward v. Village of Monroeville, 409 U.S. 57 (1972)
- Alcazar Shrine Temple v. Montgomery County Sheriff's Department, 868 So. 2d 1093 (Ala. 2003)
- Holloway v. Robertson, 500 So. 2d 1056 (Ala. 1986)
- People v. Recorder's Court Judge, 66 Mich. App. 315, 239 N.W.2d 185 (1975)
- Bender v. Ragan, 53 Wash. 521, 102 P. 427 (1909)
- Enslen v. Alabama Department of Transportation, 211 So. 3d 841 (Ala. Civ. App. 2016)
- Ex parte State ex rel. Alabama Policy Institute, 200 So. 3d 495 (Ala. 2015)
- Ex parte Vance, 900 So. 2d 394 (Ala. 2004)
- Ex parte Sharp, 893 So. 2d 571 (Ala. 2003)
- Ex parte Calhoun, 688 So. 2d 259 (Ala. 1997)
- State v. Webber, 892 So. 2d 869 (Ala. 2004)

- State v. Maddox, 828 So. 2d 946 (Ala. Crim. App. 2001)
- Ex parte Marshall, 323 So. 3d 1188 (Ala. 2020)
- Beam v. Taylor, 149 So. 3d 571 (Ala. 2014)
- State v. Isbell, 985 So. 2d 446 (Ala. 2007)
- Ex parte King, 23 So. 3d 77 (Ala. 2009)
- Ex parte Nice, 407 So. 2d 874 (Ala. 1981)

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