

TEXAS COURT OF APPEALS, FOURTH DISTRICT, SAN ANTONIO

**Shamar D. Bradley v. The Connor Group, Julie Bray Patterson, and
Roberto A. Vazquez**

No. 04-25-00482-CV · No. No. 04-25-00482-CV · Decided May 20, 2026

SUMMARY

The Fourth Court of Appeals of San Antonio dismissed an interlocutory appeal as moot after Shamar D. Bradley nonsuited all claims against the appellees. The court held that the nonsuit was effective upon filing and extinguished the live controversy concerning the trial court’s governmental-immunity ruling, regardless of whether it was served on the appellees. The court denied all pending motions.

CASE DETAILS

COURT	Texas Court of Appeals, Fourth District, San Antonio
WRITING FOR THE COURT	Rebeca C. Martinez, Chief Justice; Irene Rios, Justice; Velia J. Meza, Justice
JURISDICTION	Fourth Court of Appeals, San Antonio, Texas
DECIDED	May 20, 2026
DOCKET	No. 04-25-00482-CV
DISPOSITION	dismissed
PROCEDURAL POSTURE	Interlocutory appeal from the County Court at Law No. 3, Bexar County's order granting appellees' pleas to the jurisdiction based on governmental immunity.
STANDARD OF REVIEW	Mootness, as a component of subject-matter jurisdiction, is reviewed de novo.
PRECEDENTIAL VALUE	Published
PARTIES	Shamar D. Bradley v. The Connor Group, Julie Bray Patterson, Roberto A. Vazquez

TOPICS

- mootness
- subject matter jurisdiction
- interlocutory appeal
- appellate jurisdiction
- civil procedure

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether Bradley's notice of nonsuit extinguished the live controversy and rendered his interlocutory appeal from the governmental-immunity ruling moot.
2. Whether the nonsuit was ineffective because it was not served on the appellees.
3. Whether a pending request for sanctions preserved a justiciable interest in the interlocutory appeal.

HOLDINGS

1. A nonsuit that abandons all claims extinguishes the case or controversy as to those claims and renders moot an interlocutory appeal concerning the trial court's ruling on those claims.
2. Service on the appellees was not required for Bradley's notice of nonsuit to take effect.
3. A pending sanctions request did not preserve a justiciable interest in the interlocutory immunity ruling.

KEY QUOTATIONS

"We are obligated to consider our jurisdiction at all times," and we lack jurisdiction when no live controversy remains." (-2)

"A nonsuit is effective when filed and extinguishes the case or controversy as to the nonsuited claims, rendering interlocutory orders on the merits moot." (-2)

FACTUAL BACKGROUND

Bradley sued Judge Julie Bray Patterson, alleging official oppression and abuse of authority arising from an eviction proceeding. After Patterson recused herself, the matter was transferred to Judge Roberto A. Vazquez, whom Bradley joined as a defendant. Bradley later filed a notice nonsuiting all claims against the appellees while his interlocutory appeal from the trial court's immunity ruling was pending.

PROCEDURAL HISTORY

Bradley sued Judges Julie Bray Patterson and Roberto A. Vazquez over alleged official oppression and abuse of authority arising from an eviction proceeding. After both judges filed pleas to the jurisdiction, the trial court granted them. Bradley filed an interlocutory appeal, then filed a notice nonsuiting all claims. The court of appeals ordered him to show cause why the appeal should not be dismissed as moot and dismissed the appeal after concluding that no live controversy remained.

DISPOSITION

dismissed

CASES CITED

- *Morath v. Lewis*, 601 S.W.3d 785, 788 (Tex. 2020) (per curiam)

- Sw. Elec. Power Co. v. Lynch, 595 S.W.3d 678, 682 (Tex. 2020)
- Tex. Dep’t of Family & Protective Servs. v. Grassroots Leadership, Inc., 717 S.W.3d 854, 875 (Tex. 2025)
- Campbell-Ewald Co. v. Gomez, 577 U.S. 153, 161 (2016)
- Univ. of Tex. Med. Branch at Galveston v. Estate of Blackmon, 195 S.W.3d 98, 100–01 (Tex. 2006) (per curiam)
- Orion Invs., Inc. v. Dunaway & Assocs., Inc., 760 S.W.2d 371, 374 (Tex. App.—Fort Worth 1988, writ denied)
- Speer v. Presbyterian Children’s Home & Serv. Agency, 847 S.W.2d 227, 228 (Tex. 1993)

OPINION

Shamar D. Bradley v. the Connor Group, Julie Bray Patterson, and Roberto A. Vazquez

PER CURIAM.

Fourth Court of Appeals San Antonio, Texas

MEMORANDUM OPINION

No. 04-25-00482-CV Shamar D. BRADLEY, Appellant v. THE CONNOR GROUP, Julie Bray Patterson, and Roberto A. Vazquez, Appellees From the County Court at Law No. 3, Bexar County, Texas Trial Court No. 2025-CV-01071 Honorable Lisa Jarrett, Judge Presiding

PER CURIAM

Sitting: Rebeca C. Martinez, Chief Justice Irene Rios, Justice Velia J. Meza, Justice Delivered and Filed: May 20, 2026

DISMISSED AS MOOT

This interlocutory appeal arises from a suit against Judge Julie Bray Patterson 1 and Judge Roberto A. Vasquez. 2 Because the appellant has filed a notice of nonsuit abandoning all claims, we dismiss the appeal as moot. 1 Bexar County Justice of the Peace Precinct 3, Place 1. 2 Bexar County Justice of the Peace Precinct 2, Place 1. 04-25-00482-CV

DISCUSSION

“We are obligated to consider our jurisdiction at all times,” and we lack jurisdiction when no live controversy remains. *Morath v. Lewis*, 601 S.W.3d 785, 788 (Tex. 2020) (per curiam). Mootness is a component of subject-matter jurisdiction that we review de novo. *Sw. Elec. Power Co. v. Lynch*, 595 S.W.3d 678, 682 (Tex. 2020). A case becomes moot when the parties no longer have a “personal stake in the outcome,” that is, a “concrete interest, however small.” *Tex. Dep’t of Family & Protective Servs. v. Grassroots Leadership, Inc.*, 717 S.W.3d 854, 875 (Tex. 2025) (quoting *Campbell-Ewald Co. v. Gomez*, 577 U.S. 153, 161 (2016)). On February 7, 2025, Shamar D. Bradley sued Judge Patterson, alleging “official oppression and abuse of authority” arising from an eviction proceeding. After Judge Patterson recused, the case was transferred to Judge Vasquez, whom Bradley then joined as a defendant. Both judges filed a plea to the jurisdiction asserting governmental immunity, which the trial court granted. Bradley filed a notice of interlocutory appeal on July 11, 2025. He later filed a notice nonsuiting “all claims herein asserted by Shamar

D. Bradley.” We ordered Bradley to show cause why the appeal should not be dismissed as moot. In response, he contends the nonsuit is ineffective because it was not served on appellees and that his motion for sanctions remains pending. A nonsuit is effective when filed and extinguishes the case or controversy as to the nonsuited claims, rendering interlocutory orders on the merits moot. *Univ. of Tex. Med. Branch at Galveston v. Estate of Blackmon*, 195 S.W.3d 98, 100–01 (Tex. 2006) (per curiam). Service is not required for the nonsuit to take effect. *Orion Invs., Inc. v. Dunaway & Assocs., Inc.*, 760 S.W.2d 371, 374 (Tex. App.—Fort Worth 1988, writ denied). -2- 04-25-00482-CV This interlocutory appeal concerns only the trial court’s ruling on appellees’ immunity. See TEX. CIV. PRAC. & REM. CODE § 51.014(a)(8). Because Bradley has nonsuited all claims against appellees, no live controversy remains regarding that ruling. A pending sanctions request does not preserve a justiciable interest in the interlocutory order from which Bradley is appealing. Accordingly, we dismiss this appeal as moot. See *Speer v. Presbyterian Children’s Home & Serv. Agency*, 847 S.W.2d 227, 228 (Tex. 1993). All pending motions are denied.

PER CURIAM

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