

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.

OPINION

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 -3-