

FOURTH COURT OF APPEALS OF TEXAS

In re Justin Ludlow

No. 04-26-00246-CV · No. No. 04-26-00246-CV · Decided April 1, 2026

SUMMARY

The Fourth Court of Appeals of San Antonio denied Justin Ludlow’s petition for a writ of mandamus after concluding that he had not shown entitlement to the requested relief. The court also denied his emergency motion for temporary relief as moot.

CASE DETAILS

COURT	Fourth Court of Appeals of Texas
WRITING FOR THE COURT	Per Curiam; Rebeca C. Martinez, Chief Justice; Irene Rios, Justice; Adrian A. Spears II, Justice
JURISDICTION	Texas Court of Appeals, Fourth District
DECIDED	April 1, 2026
DOCKET	No. 04-26-00246-CV
DISPOSITION	writ_denied
PROCEDURAL POSTURE	Original mandamus proceeding in which the relator sought a writ of mandamus and emergency temporary relief.
STANDARD OF REVIEW	Mandamus is an extraordinary remedy available only upon a showing that the trial court clearly abused its discretion or violated a duty imposed by law and that the relator lacks an adequate remedy by appeal.
PRECEDENTIAL VALUE	published
PARTIES	Justin Ludlow, relator v. The State of Texas

TOPICS

- appellate procedure
- standard of review
- remedies
- civil procedure
- mootness

PRACTICE AREAS

- appellate procedure
- civil procedure
- remedies

QUESTIONS PRESENTED

1. Whether the relator established entitlement to a writ of mandamus by showing a clear abuse of discretion or violation of a legal duty and the absence of an adequate appellate remedy.
2. Whether the relator's emergency motion for temporary relief should be granted.

HOLDINGS

1. The relator was not entitled to mandamus relief because the petition and record did not show the required grounds for extraordinary relief.
2. The emergency motion for temporary relief was denied as moot.

KEY QUOTATIONS

“Mandamus is an extraordinary remedy, available only when the relator can show (1) the trial court clearly abused its discretion or violated a duty imposed by law; and (2) there is no adequate remedy by way of appeal.” (at 1)

FACTUAL BACKGROUND

The opinion provides no substantive facts concerning the underlying dispute involving the children identified in the related trial-court cause. The relator sought mandamus relief and emergency temporary relief, but the court concluded that the petition and record did not establish entitlement to relief.

PROCEDURAL HISTORY

On March 25, 2026, the relator filed a petition for writ of mandamus and an emergency motion for temporary relief. The proceeding arose from Cause No. 2024-CI-20877, pending in the 73rd Judicial District Court of Bexar County, Texas. The court of appeals denied mandamus relief and denied the emergency motion as moot.

DISPOSITION

writ_denied

CASES CITED

- Walker v. Packer, 827 S.W.2d 833, 839-40 (Tex. 1992) (orig. proceeding)

OPINION

PER CURIAM.

Fourth Court of Appeals San Antonio, Texas MEMORANDUM OPINION No. 04-26-00246-CV IN RE Justin LUDLOW Original Proceeding 1 PER CURIAM Sitting: Rebeca C. Martinez, Chief Justice Irene Rios, Justice Adrian A. Spears II, Justice Delivered and Filed: April 1, 2026 PETITION FOR WRIT OF MANDAMUS DENIED; EMERGENCY MOTION FOR TEMPORARY RELIEF DENIED AS MOOT On March 25, 2026, relator filed a petition for writ of mandamus and an emergency motion for temporary relief.

Mandamus is an extraordinary remedy, available only when the relator can show (1) the trial court clearly abused its discretion or violated a duty imposed by law; and (2) there is no adequate remedy by way of appeal. Walker v. Packer, 827 S.W.2d 833, 839-40 (Tex. 1992) (orig. proceeding).

After considering the petition and the record, this court concludes relator has not shown that he is entitled to the relief sought. Accordingly, the petition for writ of 1 This proceeding arises out of Cause No. 2024-CI-20877, styled In the Interest of S.L., E.L., and A.L., Children, pending in the 73rd Judicial District Court, Bexar County, Texas, the Honorable Elizabeth Martinez presiding.

04-26-00246-CV mandamus is DENIED. See TEX. R. APP. P. 52.8(a). Relator's emergency motion for temporary relief is DENIED AS MOOT. PER CURIAM -2-