

TEXAS COURT OF APPEALS, ELEVENTH DISTRICT AT EASTLAND

Michael Dewayne Norris v. the State of Texas

No. 11-24-00273-CR · No. 11-24-00273-CR · Decided April 2, 2026

SUMMARY

The Eleventh Court of Appeals of Texas affirmed Michael Dewayne Norris’s conviction for assault of a public servant and his twenty-year sentence. The court held that body-camera footage recording jail security footage was an admissible duplicate under Texas Rule of Evidence 1003 because Norris did not challenge the original video’s authenticity and the circumstances did not make admission unfair.

CASE DETAILS

COURT	Texas Court of Appeals, Eleventh District at Eastland
WRITING FOR THE COURT	W. Stacy Trotter; Bailey, C.J.; W. Stacy Trotter, J.; Williams, J.
JURISDICTION	Texas Court of Appeals, Eleventh District
DECIDED	April 2, 2026
DOCKET	11-24-00273-CR
DISPOSITION	affirmed
PROCEDURAL POSTURE	Norris appealed his jury conviction for assault of a public servant, challenging the admission of body-camera footage depicting an excerpt of jail security video under the best evidence rule.
STANDARD OF REVIEW	Evidentiary rulings are reviewed for abuse of discretion. There is no abuse of discretion unless the ruling lies outside the zone of reasonable disagreement; a ruling will be upheld if correct under any theory of law supported by the record and applicable to the case.
PRECEDENTIAL VALUE	Nonprecedential; opinion states: “Do not publish.”
PARTIES	Michael Dewayne Norris v. The State of Texas

TOPICS

- best evidence rule
- evidence
- standard of review
- criminal procedure
- appellate procedure

PRACTICE AREAS

- Texas criminal law
- criminal evidence
- appellate procedure

QUESTIONS PRESENTED

1. Whether the trial court abused its discretion by admitting body-camera footage recording the original jail security video when the appellant objected that the original was required under the best evidence rule.

HOLDINGS

1. The body-camera footage was an admissible duplicate of the original jail security video because the appellant did not challenge the authenticity of the original and the circumstances did not make admission of the duplicate unfair.
2. The trial court did not abuse its discretion by admitting the body-camera footage, and the appellate court overruled Norris's sole issue.

KEY QUOTATIONS

“As a recording of the original jail security video, the objected-to body camera footage falls within the definition of a “duplicate” for the purposes of the best evidence rule.” (at 3)

“Here, Appellant did not challenge the authenticity of the original jail security video in the trial court below, and the circumstances do not suggest unfairness; therefore, the body camera footage recorded by Deputy Piper was an admissible duplicate of the original jail security video.” (at 3)

FACTUAL BACKGROUND

Norris, an inmate at the Eastland County Jail, attacked Sergeant James Christopher Tighe and punched him multiple times while Tighe was delivering paperwork. Deputy Daniel Piper observed the jail security footage capturing the assault and recorded the footage from a monitor with his body camera because the security system could not readily produce transferable video files. Piper testified that the body-camera recording fairly and accurately depicted the relevant events and had not been altered or deleted.

PROCEDURAL HISTORY

A jury in the 91st District Court of Eastland County convicted Appellant of assault of a public servant, found an enhancement allegation true, and assessed twenty years' imprisonment. The trial court sentenced him accordingly and overruled his objection to admission of body-camera footage recording the original jail security video. The Eleventh Court of Appeals affirmed.

DISPOSITION

affirmed

CASES CITED

- Ruiz v. State, 631 S.W.3d 841, 855 (Tex. App.—Eastland 2021, pet. ref'd)
- Barron v. State, 630 S.W.3d 392, 410 (Tex. App.—Eastland 2021, pet. ref'd)
- Wishert v. State, 654 S.W.3d 317, 330 (Tex. App.—Eastland 2022, pet. ref'd)
- Ballard v. State, 23 S.W.3d 178, 181 (Tex. App.—Waco 2000, no pet.)

Retrieved from lawtools.ai · <https://lawtools.ai/cases/state/texas-court-of-appeals-eleventh-district-texas-court-of-appeals-eleventh-district-at-eastland/2026/michael-dewayne-norris-v-the-state-of-texas-sn3idzs0>