

FIFTEENTH COURT OF APPEALS OF TEXAS

In re Robert Edward Battaile

In re Battaile · No. 15-25-00220-CV · Decided December 30, 2025

SUMMARY

The Fifteenth Court of Appeals of Texas dismissed Robert Edward Battaile’s petition for writ of mandamus for lack of jurisdiction. The court held that Battaile had not shown the requested relief was necessary to enforce the court’s jurisdiction and that the court was not authorized to issue mandamus against the City of Manor officials named as respondents. The petition concerned alleged violations of the Texas Open Meetings Act.

CASE DETAILS

COURT	Fifteenth Court of Appeals of Texas
WRITING FOR THE COURT	Chief Justice Brister; Justice Field; Justice Farris
JURISDICTION	Texas Court of Appeals, Fifteenth Court of Appeals
DECIDED	December 30, 2025
DOCKET	15-25-00220-CV
DISPOSITION	dismissed
PROCEDURAL POSTURE	Original proceeding in which the relator petitioned for writs of mandamus to compel City of Manor officials to comply with the Texas Open Meetings Act.
PRECEDENTIAL VALUE	Published memorandum opinion; precedential status is identified as published in the provided metadata.
PARTIES	Robert Edward Battaile, Relator v. Various officials with the City of Manor, including the mayor, secretary, city manager, and chair of the City's Charter Review Commission

TOPICS

- appellate jurisdiction
- writ of certiorari
- subject matter jurisdiction
- appellate procedure
- municipal law

PRACTICE AREAS

- appellate procedure
- civil procedure
- municipal law
- open meetings law

QUESTIONS PRESENTED

1. Whether the Fifteenth Court of Appeals had jurisdiction to issue writs of mandamus against City of Manor officials to compel compliance with the Texas Open Meetings Act.
2. Whether the requested mandamus relief was necessary to enforce the jurisdiction of the court of appeals.

HOLDINGS

1. The Fifteenth Court of Appeals was not authorized to issue writs of mandamus against the city officials named by Battaile.
2. The petition for writ of mandamus was dismissed for lack of jurisdiction.

KEY QUOTATIONS

“Consequently, we lack jurisdiction to issue the writs of mandamus requested by Battaile.”

“We dismiss relator’s petition for writ of mandamus for lack of jurisdiction.”

FACTUAL BACKGROUND

Robert Edward Battaile sought mandamus relief against the mayor, secretary, and city manager of the City of Manor and the chair of the City's Charter Review Commission. He claimed that the officials should be compelled to comply with the Texas Open Meetings Act. The court of appeals determined that the requested writs were not necessary to enforce its jurisdiction and that it lacked authority to issue mandamus against the city officials.

PROCEDURAL HISTORY

Battaile filed a petition for writ of mandamus in the Fifteenth Court of Appeals against various City of Manor officials. The court concluded that it lacked jurisdiction because the requested relief was not necessary to enforce the court's jurisdiction and the court was not authorized to issue mandamus against the city officials. The petition was dismissed for lack of jurisdiction.

DISPOSITION

dismissed

OPINION

PER CURIAM.

Petition for Writ of Mandamus Dismissed and Memorandum Opinion filed December 30, 2025. In The Fifteenth Court of Appeals NO. 15-25-00220-CV IN RE ROBERT EDWARD BATTAILLE, Relator ORIGINAL PROCEEDING WRIT OF MANDAMUS 459th District Court Travis County, Texas Trial Court Cause No. D-1-GN-25-000719 MEMORANDUM OPINION Relator Robert Edward Battaile has filed a petition in this Court seeking writs of mandamus against various

officials with the City of Manor, including the mayor, secretary, and city manager, along with the chair of the City's Charter Review Commission.

See Tex. R. App. P. 52.10. Specifically, Battaile seeks to compel the respondents to comply with the Texas Open Meetings Act (TOMA). See Tex. Gov't Code § 551.142 (authorizing actions by mandamus or injunction "to stop, prevent, or reverse a violation or threatened violation" of TOMA). Each court of appeals, including this Court, has authority to issue writs of mandamus "against a judge of district, statutory county, statutory probate county, or county court in the court of appeals district." 1 Id. § 22.221(b) In addition, each court of appeals may issue writs of mandamus "and all other writs necessary to enforce the jurisdiction of the court." Id. § 22.221(a).

Here, Battaile has not shown that the mandamus relief requested is necessary to enforce the jurisdiction of this Court, and we are not authorized to issue writs of mandamus against the city officials. Consequently, we lack jurisdiction to issue the writs of mandamus requested by Battaile.

We dismiss relator's petition for writ of mandamus for lack of jurisdiction. PER CURIAM Panel consists of Chief Justice Brister and Justices Field and Farris. 1 In addition, the original jurisdiction of this Court to issue writs "is limited to writs arising out of matters over which the court has exclusive intermediate appellate jurisdiction under Section 22.220(d) [of the Texas Government Code]." Tex. Gov't Code § 22.221(c-1).