

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