

LOUISIANA COURT OF APPEAL, FOURTH CIRCUIT

Jordan Lipner-Riza v. Timothy Aaron Causey

2024-CA-0612 · No. 2024-CA-0612 · Decided December 1, 2025

SUMMARY

The Louisiana Fourth Circuit Court of Appeal dismissed Timothy Aaron Causey’s appeal from a judgment granting Jordan Lipner-Riza’s motion to relocate their minor child and awarding her physical custody. The court held that the appeal was untimely because the filing of a supervisory writ application did not interrupt the applicable appeal delays. The court therefore dismissed the appeal for lack of jurisdiction.

CASE DETAILS

COURT	Louisiana Court of Appeal, Fourth Circuit
WRITING FOR THE COURT	Karen K. Herman; Daniel L. Dysart; Sandra Cabrina Jenkins
JURISDICTION	Louisiana Court of Appeal, Fourth Circuit
DECIDED	December 1, 2025
DOCKET	2024-CA-0612
DISPOSITION	dismissed
PROCEDURAL POSTURE	Defendant Timothy Aaron Causey appealed a judgment granting plaintiff Jordan Lipner-Riza's motion to relocate the principal residence of their minor child. The court dismissed the appeal for lack of appellate jurisdiction because the appeal was untimely.
STANDARD OF REVIEW	Appellate courts have a duty to determine sua sponte whether appellate jurisdiction exists. The timeliness of an appeal is a jurisdictional issue.
PRECEDENTIAL VALUE	Published opinion
PARTIES	Timothy Aaron Causey v. Jordan Lipner-Riza

TOPICS

- appellate jurisdiction
- appellate procedure
- family law procedure
- child custody
- relocation

PRACTICE AREAS

- family law
- appellate procedure
- civil procedure

QUESTIONS PRESENTED

1. Whether the Fourth Circuit had appellate jurisdiction over Causey's appeal from the judgment granting the motion to relocate the minor child's principal residence.
2. Whether the filing and consideration of Causey's supervisory-writ application interrupted or extended the statutory period for filing an appeal.

HOLDINGS

1. An appeal from a judgment modifying custody and visitation must be taken within thirty days from the date of mailing notice of the denial of a timely motion for new trial. Because notice was mailed on February 1, 2024, the last day to appeal was March 4, 2024, and Causey did not file his appeal until April 18, 2024, the appeal was untimely.
2. The filing of a supervisory-writ application does not interrupt or extend the appeal delay absent an applicable stay; therefore, Causey's writ application did not preserve or extend the time for filing his appeal.

KEY QUOTATIONS

“Before considering the merits of any appeal, an appellate court has ‘the duty to determine sua sponte whether [proper] jurisdiction exists, even when the parties do not raise the issue.’” (p. 1)

“Moreover, it is well-established that an application for supervisory writs has “no effect on the appeal delays.”” (p. 2)

“Because the filing of the writ application did not interrupt the appeal delays, this appeal is untimely.” (p. 2)

FACTUAL BACKGROUND

The parties were unmarried parents of a son born on March 27, 2017. The trial court granted Lipner-Riza's motion to relocate the child's principal residence, awarded her physical custody, and established a visitation and holiday schedule. Causey sought review after the judgment and subsequent denial of his motion for new trial, but filed the appeal more than thirty days after notice of the denial of the timely motion for new trial.

PROCEDURAL HISTORY

The Civil District Court for Orleans Parish granted Lipner-Riza's motion to relocate, awarded her physical custody, and established visitation and telephone-contact provisions on November 9, 2023. Causey's motion for new trial was initially denied as untimely, but the appellate court later granted a supervisory writ determining that the motion had been timely while denying relief on the merits. Causey then filed a motion for appeal on April 18, 2024; the Fourth Circuit held that the supervisory-writ application did not interrupt the appeal period and dismissed the appeal as untimely.

DISPOSITION

dismissed

CASES CITED

- Jordan Lipner-Riza v. Timothy Aaron Causey, 2024-C-0087 (La. App. 4 Cir. 3/18/24), unpub.
- Succession of Hickman, 2022-0730 (La. App. 4 Cir. 3/15/23), 359 So. 3d 584
- Lirette v. Adams, 2022-0552 (La. App. 4 Cir. 1/31/23), 382 So. 3d 122
- Gilberti v. Gilberti, 2022-0291 (La. App. 4 Cir. 11/2/22), 351 So. 3d 800
- Gregory Swafford Family Trust v. Graystar Mortg., LLC, 2022-00059 (La. 3/15/22), 333 So. 3d 1238 (per curiam)
- Guillory v. Hartford Ins. Co., 383 So. 2d 144 (La. App. 3d Cir. 1980)

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