

LOUISIANA COURT OF APPEAL, THIRD CIRCUIT

Mason Wayne Morris v. Jasmine Sharell Morris

Morris · No. 25-746 · Decided May 13, 2026

SUMMARY

The Louisiana Third Circuit Court of Appeal considered whether an Alabama divorce and custody judgment should be made executory in Louisiana. The court held that res judicata and law-of-the-case principles barred relitigation of Alabama's jurisdiction over the custody dispute, reversed the Louisiana trial court's judgment, and remanded for further proceedings.

CASE DETAILS

COURT	Louisiana Court of Appeal, Third Circuit
WRITING FOR THE COURT	Wilbur L. Stiles; Sharon Darville Wilson; Guy E. Bradberry
JURISDICTION	Louisiana Court of Appeal, Third Circuit
DECIDED	May 13, 2026
DOCKET	25-746
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Mason Wayne Morris appealed from the Rapides Parish district court's denial and dismissal of his petition to make an Alabama divorce and custody decree executory in Louisiana.
STANDARD OF REVIEW	The opinion applies legal doctrines concerning res judicata, law of the case, final judgments, and appellate divestiture of trial-court jurisdiction; no separately stated standard of review appears.
PRECEDENTIAL VALUE	Unknown
PARTIES	Mason Wayne Morris v. Jasmine Sharell Morris

TOPICS

- child custody
- subject matter jurisdiction
- res judicata
- appellate procedure
- family law procedure

PRACTICE AREAS

- family law
- civil procedure
- appellate procedure

QUESTIONS PRESENTED

1. Whether the Alabama court's final judgment determining that Alabama had subject matter jurisdiction barred Jasmine under res judicata from relitigating jurisdiction in Louisiana.
2. Whether the prior Third Circuit decision holding that Alabama had exclusive, continuing custody jurisdiction constituted law of the case and barred reconsideration of that issue.
3. Whether the Louisiana trial court erred by denying Mason's petition to make the Alabama divorce and custody decree executory after the prior appellate decision became final.

HOLDINGS

1. Res judicata applies to the Alabama judgment determining that Alabama had subject matter jurisdiction and bars Jasmine from raising the same jurisdictional issue in subsequent proceedings between the parties concerning Madeline's custody.
2. The law-of-the-case doctrine barred the trial court from reconsidering whether Alabama had exclusive, continuing jurisdiction over the custody dispute after the Third Circuit decided that issue in the prior appeal.
3. The Louisiana trial court erred in denying Mason's petition to make the Alabama divorce and custody decree executory because the final appellate determination of Alabama's exclusive, continuing jurisdiction could not be modified, revised, or reversed by the trial court.

KEY QUOTATIONS

“One trial of an issue is enough.” (8)

“the general rule [is] that a judgment is entitled to full faith and credit—even as to questions of jurisdiction—when the second court’s inquiry discloses that those questions have been fully and fairly litigated and finally decided in the court which rendered the original judgment.” (9)

“Once a final judgment acquires the authority of thing adjudged, no court has jurisdiction, in the sense of power and authority, to modify, revise, or reverse the judgment, regardless of the magnitude of the error in the final judgment.” (12)

FACTUAL BACKGROUND

Mason and Jasmine Morris are the parents of Madeline Morris, whose custody was disputed between Louisiana and Alabama. After the parties separated, Mason filed for divorce and custody in DeKalb County, Alabama, and the Alabama court denied Jasmine's motion to dismiss for lack of subject matter jurisdiction after hearing evidence concerning Madeline's residence and time spent in Alabama. The Alabama court then entered a divorce judgment awarding Mason sole legal and physical custody, and Jasmine did not appeal either the jurisdiction ruling or the final custody judgment. Louisiana courts later addressed the competing jurisdictional claims, and the Third Circuit held in a prior appeal that Alabama had exclusive, continuing jurisdiction.

PROCEDURAL HISTORY

Mason obtained an Alabama divorce and custody judgment after the Alabama circuit court denied Jasmine's motion to dismiss for lack of subject matter jurisdiction. Mason petitioned in Louisiana to make the Alabama

judgment executory. The Louisiana trial court initially found Alabama had subject matter jurisdiction, but while a related appeal was pending it later issued reasons and a judgment finding that Alabama lacked jurisdiction and denying Mason's enforcement petition. After denying Mason's motion for new trial, the trial court's judgment was appealed. The Third Circuit reversed and remanded.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The matter is remanded to the trial court for further proceedings consistent with the opinion, including proceedings consistent with the determination that Alabama has exclusive, continuing jurisdiction and that Mason's Alabama divorce and custody decree should be made executory in Louisiana.

CASES CITED

- Morris v. Morris, 24-705, pp. 2-4 (La. App. 3 Cir. 4/30/25), 411 So. 3d 884, 886-87
- Chauvin v. Exxon Mobil Corp., 14-808, pp. 5-6 (La. 12/9/14), 158 So. 3d 761, 765
- Durfee v. Duke, 375 U.S. 106, 111, 113, 84 S. Ct. 242, 246 (1963)
- Treinies v. Sunshine Mining Co., 308 U.S. 66, 78, 60 S. Ct. 44, 51 (1939)
- Jeff Mercer, L.L.C. v. State, Department of Transportation & Development, 14-1752, p. 7 (La. App. 1 Cir. 6/5/15), 174 So. 3d 1180, 1185
- Petition of Sewerage & Water Board of New Orleans, 278 So. 2d 81, 83 (La. 1973)
- Gooding v. Merrigan, 15-200 (La. App. 5 Cir. 11/19/15), 180 So. 3d 578, 580
- Pumphrey v. City of New Orleans, 05-979 (La. 4/4/06), 925 So. 2d 1202, 1207
- Herrera v. Beatrice Gallegos & USAgencies Casualty Insurance, 14-935 (La. App. 5 Cir. 10/28/15), 178 So. 3d 164, 168
- Reed v. Louisiana Horticulture Commission, 21-657 (La. App. 1 Cir. 12/22/21), 341 So. 3d 66, 70, writ denied, 22-284 (La. 4/12/22), 336 So. 3d 89
- Neville v. Redmann, 22-175, pp. 12-13 (La. App. 5 Cir. 12/31/22), 356 So. 3d 568, 578, writ denied, 23-126 (La. 4/4/23), 358 So. 3d 861
- Tolis v. Board of Supervisors of Louisiana State University, 95-1529, pp. 2-3 (La. 10/16/95), 660 So. 2d 1206, 1206-07 (per curiam)