Case Summaries
December 6, 2024

Case summaries are prepared by court staff as a courtesy. They are not a substitute for the actual opinions.

DECIDED CASES

PROCEDURE—PRETRIAL
Sufficient Pleadings

Herrera v. Mata, ___ S.W.3d ___, 2024 WL ___ (Tex. Dec. 6, 2024) (per curiam) [23-0457]

At issue in this case is whether the plaintiffs pleaded sufficient facts to allege an ultra vires claim against irrigation district officials under the Tax Code.

In 2019, Hidalgo County Irrigation District No. 1 sought to collect charges accrued in the 1980s and 1990s from a group of homeowners. The homeowners sued the district, claiming that the charges are taxes and that the district's refusal to remove them from the tax rolls violates the Tax Code's limitations period. In the alternative, the homeowners claim that the charges are Water Code assessments that the district has no authority to levy. The district filed a plea to the jurisdiction, arguing that the charges are assessments with no applicable limitations period; thus, governmental immunity bars suits seeking to stop their collection. The trial court granted the plea.

The court of appeals affirmed in part. It held that the Tax Code does not apply as a matter of law, so district officials did not act ultra vires by refusing to remove the charges from the tax rolls.

The Supreme Court reversed. It held that the homeowners pleaded sufficient facts to demonstrate the trial court's jurisdiction for their Tax Code claim by alleging that the charges are taxes assessed well after the limitations period. It also held that the homeowners' alternative pleading treating the charges as assessments does not affirmatively negate their pleadings that the charges are taxes. The Court remanded the case to the trial court for further proceedings.

PROCEDURE—PRETRIAL

Discovery

In re Euless Pizza, ___ S.W.3d ___, 2024 WL ___ (Tex. Dec. 6, 2024) (per curiam) [23-0830]

At issue is the trial court's denial of relators' request to withdraw and amend responses to requests for admission.

Two delivery drivers for i Fratelli Pizza began racing each other in a low-speed zone. One crashed into plaintiffs' vehicle, injuring them. The driver was arrested and indicted for felony racing causing serious bodily injury. Plaintiffs sued the driver and three corporate defendants, including Euless Pizza, LP.

In discovery, plaintiffs asked each corporate defendant to admit that at the time of the crash, the driver was acting within the scope of his employment "with i Fratelli Pizza" (RFA No. 6) and "with You" (RFA No. 10). Each defendant admitted to RFA No. 6, while only Euless Pizza admitted to RFA No. 10. Defendants later sought leave to withdraw and amend their admissions to reflect that each denied RFA Nos. 6 and 10. The trial court denied the motion, and the court of appeals denied defendants' request for mandamus relief.

The Supreme Court granted defendants' request for mandamus relief in a per curium opinion. The Court reiterated the established test for withdrawing admissions—good cause and lack of undue prejudice to the opposing party—and held that the test is met here.

Defendants represented that their initial responses were based on a misunderstanding about the pizzeria's corporate structure and confusion arising from the wording of the RFAs. Defendants further contended that new information revealed in the police investigation supported a defense that the driver's criminal conduct was outside the scope of his employment. Defendants' explanation establishes good cause, the Court said, because their initial responses were based on inaccurate or incomplete information, and there is no evidence defendants acted in bad faith. The Court reasoned that the no-undue-prejudice prong is also met because granting defendants' motion would not have delayed trial or hampered plaintiffs' preparation, while denial of the motion compromised the merits by eliminating defendants' scope-of-employment defense. The Court emphasized that RFA must not be used to trick a party into admitting that it has no claim or defense. Additionally, the Court clarified that the test for changing an admission is not a high bar and that a trial court's "broad discretion" when faced with such a request is not unlimited.