



Case Summaries January 30, 2026

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DECIDED CASES

Morrison v. Morrison, __ S.W.3d __, 2026 WL __ (Tex. Jan. 30, 2026) [24-0053]

The issue in this case is whether the trial court properly exercised its jurisdiction to enforce a divorce decree after one spouse failed to meet their obligations under the decree.

Rodney and Debbie Morrison divorced in April 2021. The divorce decree provided for the sale of certain marital property, including the marital residence, allocating half of the proceeds to each spouse. In the event that either spouse failed to comply with their obligations, the decree included a provision requiring that the fair market value of any undelivered or damaged property be assessed against the breaching spouse and “accounted for” out of the proceeds from the sale of the marital residence. Debbie alleged that Rodney damaged the marital residence before it was sold and refused to turn over designated personal property.

The trial court found that Rodney violated the divorce decree and awarded Debbie an amount in damages equivalent to one hundred percent of the proceeds from the sale of the marital residence. The court of appeals held that, in doing so, the trial court modified the decree’s division of property in violation of Chapter 9 of the Family Code. The court vacated the order and dismissed the case for lack of jurisdiction.

The Supreme Court reversed the court of appeals’ judgment and remanded the case to the trial court. The Court held that the trial court had jurisdiction to enforce the decree and to award damages associated with breach of the decree but erred in reallocating the proceeds from the sale of the marital residence to Debbie without evidence of the damages resulting from breach of the decree. However, such error did not deprive the trial court of all jurisdiction to enforce the decree.