

No. \_\_\_\_\_

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**In the Supreme Court of Texas**  
**Austin, Texas**

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IN RE MICHAEL RUFF,

*Relator*

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**Petition for Writ of Mandamus**

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## Statement of the Case

The issue in this original proceeding is whether the trial court abused its discretion by sustaining the judgment creditor's challenge to the judgment debtor's net worth evidence when the trial court (i) disregarded prima facie evidence of the judgment debtor's net worth solely because it deemed the debtor's evidence and testimony not credible, and (ii) failed to state with particularity the factual basis for determining the judgment debtor's net worth.

**Trial Court:** Probate Court No. 1 of Dallas County, Texas, Hon. Brenda Hull Thompson, presiding.

**Disposition:** Granted Motion to Contest Net Worth and signed order setting relator's net worth at \$49,000,000 and setting supersedeas bond at \$24,500,000 ([Apx. Tab G](#)).

### Parties in the

**Court of Appeals:** *Movant:* Michael A. Ruff  
*Respondents:* Suzann Ruff, Matthew D. Ruff, and Frost Bank, N.A.

**Court of Appeals:** Fifth Court of Appeals. Opinion by Chief Justice Wright

**Disposition:** Trial court's order valuing debtor's net worth at \$49,000,000 and setting supersedeas bond at \$24,500,000 affirmed. ([Apx. Tab I](#)).

**Opinion:** *Ruff v. Ruff*, No. 05-18-00326-CV, 2018 Tex. App. LEXIS 4155 (Tex. App.—Dallas June 8, 2018). ([Apx. Tab I](#))



### **Statement of Jurisdiction**

The Court has jurisdiction under Government Code § 22.002 and Texas Rule of Appellate Procedure 24.4(a).

### **Issue Presented**

The trial court abused its discretion by sustaining the challenge to Relator's net worth evidence.

### **Why This Case is Important**

Texas Rule of Appellate Procedure 24.2(c)(3) requires a trial court to "issue an order that states the debtor's net worth and states with particularity the factual basis for that determination." This Court enforces that rule through its power to issue writs of mandamus. *See In re Smith*, 192 S.W.3d 564, 568 (Tex. 2006) ("The trial court abused its discretion here because it failed to state with particularity the factual basis for its determination that Smith's net worth was \$1,142,951. The trial court did not make any findings that would permit a reviewing court to ascertain the basis for that determination."). Without question, the trial court in this case violated Rule 24.2(c)(3).

The court of appeals, however, held that the trial court could pick its own net worth number if it found the judgment debtor and his net worth evidence was not credible. Neither the rules of appellate procedure nor any decision by this Court authorize that approach. On the contrary, Rule 24.2(c)(1) provides

that a debtor's affidavit of net worth is prima facie evidence of the debtor's net worth. And this Court has held that "to overcome a prima facie showing, an opposing party must offer *evidence* to rebut what has been established. The trial court is not free simply to disbelieve the direct, positive evidence that establishes the prima facie case." *Griffin v. Thirteenth Court of Appeals*, 934 S.W.2d 349, 352 (Tex. 1996) (holding that trial court abused its discretion in sustaining contest to affidavit of inability to pay costs).

Here, Relator Michael Ruff presented the trial court with a net worth affidavit and testified to his net worth at the hearing. The court of appeals admitted that "It is true that Michael's testimony was uncontroverted." ([Apx. Tab H](#)). But the court held that trial court's decision to deem Michael's net worth "to be not less than \$49,000,000" was appropriate because, "It is equally true, however, that Michael's testimony was not credible." ([Id.](#)). That ruling directly violates *Griffin's* holding that a trial court is not free to simply disbelieve evidence that establishes a prima facie case.

This Court has observed that the 2003 changes to Texas supersedeas practice "may be seen as more protective of debtors, consistent with deep, populist Texas traditions. They may also be seen as respecting the importance of the right to a meaningful appeal." *In re Longview Energy Co.*, 464 S.W.3d 353,

359 (Tex. 2015). And Professor Carlson has explained that the “changes to appellate security reform are intended to facilitate appellate access and provide relief to judgment debtors facing insolvency as the only option to avoid judgment execution or to those with a judgment so large that the cost of supersedeas, in the full amount of the judgment, would effectively inhibit their ability to appeal.” Elaine A. Carlson, *Tort Reform: Redefining the Role of the Court and the Jury*, 47 S. TEX. L. REV. 245, 280 (2005).

Given those important policy considerations, this Court should reject the approach the Fifth Court and the Eighth Court<sup>1</sup> have authorized. If a trial court concludes that, based on the evidence submitted by the judgment debtor, it cannot comply with Rule 24.2(c)(3)’s mandatory requirement to state with particularity the factual basis for its net worth determination, the debtor should not forfeit the right to post a bond in an amount that reflects his or her net worth. The correct result is for the court to order that the debtor present sufficient evidence to make the Rule 24.2(c)(3) finding. This right to a “do over” is consistent with Rule 24’s provisions giving a debtor the right to seek modification of the amount of security throughout the life of the appeal and

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<sup>1</sup> See *Newsome v. N. Tex. Neuroscience Ctr., P.A.*, 2009 Tex. App. LEXIS 8628 (Tex. App.—El Paso 2009, no pet.).

giving the trial court continuing jurisdiction to do so. *See* Tex. R. App. P. 24.3(a). In other words, there is no compelling need for finality in this particular setting.

### **Statement of Facts**

This case arises out of a contest to the sufficiency of a judgment debtor's supersedeas bond. In 2017, an arbitration panel awarded \$49,000,000 in actual damages to Suzann Ruff as against her son, Michael Ruff. ([Apx. Tab A](#)). The Dallas County Probate Court confirmed the arbitration award, and signed a judgment on February 5, 2018. ([Apx. Tab B](#)). It also entered an amended final judgment on February 21, 2018. ([Apx. Tab C](#)).

To supersede enforcement of the judgment Relator, Michael Ruff ("Michael"), filed a net worth declaration showing a negative net worth in the amount of \$2,844,268.37 and tendered a cash bond of \$1. ([Apx. Tabs D and E](#)). Real Party, Suzann Ruff filed a contest to Michael's net worth declaration. ([Apx. Tab F](#)).

In its March 19, 2018 Order on Suzann's contest of Michael's affidavit of net worth, the Probate Court adopted all findings of the arbitration panel. ([Apx. Tab G](#)). The Probate Court found that Michael had "exhibited a pattern of concealment of information" with respect to his assets, including the real or

personal property owned by him, in whole or in part, or under his sole or joint control. ([Id. at p. 2, ¶ 5](#)). It further found that Michael's net worth affidavit and testimony were "not complete and did not provide sufficient detailed information to be credible." ([Id. at p. 3, ¶ 6](#)).

For these reasons, the Court's order concluded that "Michael A. Ruff's net worth is not less than \$49,000,000[]" and set the supersedeas bond at \$24,500,000. ([Id. at p. 3, ¶ 9 and p. 4](#)). The order did not contain any findings of fact or state with particularity the trial court's basis for determining the value of Michael's net worth. ([Apx. Tab G](#)).

Michael filed a motion to review the Probate Court's Order setting the supersedeas bond pursuant to Texas Rule of Appellate Procedure 24.4(a) and Texas Civil Practice & Remedies Code § 52.006(d). ([Apx. Tab H](#)). Chief Justice Carolyn Wright, writing for the Fifth District Court of Appeals, agreed that "Michael's [net worth] testimony was uncontroverted[.]" ([Apx. Tab I, at p. \\*12](#)). Nevertheless, Chief Justice Wright also held "[i]t is equally true, however, that Michael's testimony was not credible." ([Id.](#)). Because "Michael did not present credible evidence regarding his assets and liabilities from which [the trial court] could determine net worth[.]" the court of appeals affirmed the trial court's order. ([Id. at \\*12-13](#)).

## Argument and Authorities

### 1. Introduction.

Rule of Appellate Procedure 24.1 allows a judgment debtor to supersede a judgment by, among other things, “making a deposit with the trial court clerk in lieu of a bond[.]” *Texas Custom Pools, Inc. v. Clayton*, 293 S.W.3d 299, 305 (Tex. App.—El Paso 2009, no pet.). “When the judgment is for money, the amount of the bond, deposit, or security must equal the sum of compensatory damages awarded in the judgment, interest for the estimated duration of the appeal, and costs awarded in the judgment. But the amount must not exceed the lesser of: (a) 50 percent of the judgment debtor’s current net worth; or (b) 25 million dollars.” TEX. R. APP. P. 24.2(a)(1).

A judgment debtor who provides a deposit in an amount based on his net worth under Rule 24.2(a)(1) must also simultaneously file an affidavit stating his net worth and containing complete and detailed information concerning his assets and liabilities from which net worth may be determined. TEX. R. APP. P. 24.2(c)(1). “The affidavit is prima facie evidence of the debtor’s net worth.” *Id.* If the valuation of the debtor’s net worth is contested, the debtor bears the burden of proving his net worth. TEX. R. APP. P. 24.2(c)(3). The trial court is required to hear the contest, and must issue an order stating the debtor’s net worth and setting forth “with particularity the factual basis for that determina-

tion.” *Id.*

**2. The court of appeals erred in disregarding prima facie evidence of net worth.**

The court of appeals’ holding that the trial court could pick its own net worth value if it found the debtor and his net worth evidence were not credible directly contradicts the Rules of Appellate Procedure and this Court’s precedent. An affidavit setting forth a debtor’s assets and liabilities is prima facie evidence of his net worth. TEX. R. APP. P. 24.2(c). In *Griffin Indus. v. Thirteenth Court of Appeals*, 934 S.W.2d 349 (Tex. 1996), this Court held:

To overcome a prima facie showing, an opposing party must offer *evidence* to rebut what has been established. The trial court is not free to simply disbelieve the direct, positive evidence that establishes the prima facie case.

*Id.* at 352 (emphasis in original). Echoing this holding, the Fifth Court itself has held facts that create mere skepticism regarding a debtor’s net worth are not sufficient to controvert the debtor’s prima facie evidence. *GM Houser, Inc. v. Rodgers*, 204 S.W.3d 836, 846 (Tex. App—Dallas 2006 no pet.).

Here, in conjunction with his deposit of \$1, Michael submitted an affidavit setting forth his various assets and liabilities and the monetary values for each. ([Apx. Tab D](#)). Using the accepted calculation for net worth (current assets mi-

nus current liabilities),<sup>2</sup> Michael’s affidavit demonstrated a negative net worth of \$2,844,268.37. ([\*Id.\*](#))

At the hearing on the Motion to Contest Net Worth, Suzann Ruff did not offer any evidence to controvert Michael’s testimony regarding his net worth. Indeed, the court of appeals’ opinion verifies that “Michael’s testimony was uncontroverted.” ([\*Apx. Tab I, at p. \\*12\*](#)). The record at the time of the hearing was devoid of any evidence to rebut Michael’s net worth. Accordingly, the trial court was not free to disbelieve his valuation and arbitrarily value his net worth at the sum of the judgment (“not less than \$49,000,000”). The court of appeals opinion holding otherwise is error, and must be reversed.

**3. The trial court abused its discretion in failing to state the factual basis for its net worth valuation with particularity.**

The Fifth Court cited *Bishop Abbey Homes, Ltd v. Hale*, 2015 Tex. App. LEXIS 7527 (Tex. App.—Dallas 2015, mem. op.), for the proposition that when a debtor lacks credible evidence to satisfy his burden of proof on net worth, a trial court may dispose with the “particularity” requirements of Texas Rule of Appellate Procedure 24.2(c)(3) and, instead, “set the bond in ac-

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<sup>2</sup> *Enviropower, LLC v. Bear, Stearns & Co., Inc.*, 265 S.W.3d 1, 5 (Tex. App.—Houston [1st Dist.] 2008 pet. denied) (“[T]he correct measure of a company’s net worth for the purpose of setting a supersedeas bond under section 52.006 of the Texas Civil Practice and Remedies Code and Rule 24 of the Texas Rules of Appellate Procedure is the company’s current assets minus current liabilities at the time the bond is set.”).



cordance with section 52.006(a) and rule 24.2(a)(1).” ([Apx. Tab I, at p. \\*5](#)). However, *Bishop Abbey* and the El Paso court of appeals opinion it relied on<sup>3</sup> are distinguishable.

In *Bishop Abbey* and *Newsome*, the judgment creditors who contested their debtors’ net worth both presented evidence to rebut their debtors’ affidavits. *Bishop Abbey*, 2015 Tex. App. LEXIS 7527, at pp. \*10-13 (Tex. App.—Dallas 2015, mem. op.) (creditor offered testimony of a certified public account to rebut debtor’s contention that balance sheet attached to his statement of net worth was prepared in accordance with generally accepted accounting principles); *Newsome*, 2009 Tex. App. LEXIS 8628, at p. \*4 (creditor and debtor submitted documentary evidence at hearing on motion to vacate prior order setting value of supersedeas bond following post-judgment discovery).

Although Suzann contended that Michael’s net worth affidavit was unreliable, that affidavit set forth monetary values for his assets and liabilities from which his net worth, positive or negative, could be readily calculated. *See, e.g., GM Houser, Inc. v. Rodgers*, 204 S.W.3d 836, 845 (Tex. App. Dallas 2006, no pet.). Suzann offered no testimony or evidence to controvert Michael’s prima

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<sup>3</sup> *See Newsome v. N. Tex. Neuroscience Ctr., P.A.*, 2009 Tex. App. LEXIS 8628 (Tex. App.—El Paso 2009, no pet.).

facie evidence. As the court of appeals opinion notes, Michael's testimony "was uncontroverted." On this record, there is no evidence that would allow the trial court to disregard Michael's net worth affidavit.

In addition to being distinguishable, the *Bishop Abbey* and *Newsome* courts' dispensation of Rule 24 particularity requirement are against the great weight of authority in this state. This Court has held that a trial court abuses its discretion when it issues an order that does not state with particularity the factual basis for its determination of a judgment debtor's net worth. *In re Smith*, 192 S.W.3d 564, 570 (Tex. 2006). The purpose for this mandatory rule is to provide reviewing courts with enough information to ascertain the basis for the trial court's net worth calculation and to conduct a legal sufficiency review. *Id.* at 568-70. Important policy considerations intended to "facilitate appellate access and provide relief to judgment debtors facing insolvency as the only option to avoid judgment execution" also underlie this rule. *See* Elaine A. Carlson, *Tort Reform: Redefining the Role of the Court and the Jury*, 47 S. TEX. L. REV. 245, 280 (2005).

If allowed to stand, the probate court's bald assertion that "Michael A. Ruff's net worth is not less than \$49,000,000" will cause Relator to forfeit his right to post a bond in an amount that truly reflects his net worth. The probate

court's inability to comply with Rule 24.2(c)(3)'s mandatory requirement that it state with particularity the factual basis for its net worth determination can be properly alleviated by an order requiring Michael, as judgment debtor, to present sufficient evidence to enable it to make its Rule 24.2(c)(3) finding. This "do over" is consistent with Rule 24's provisions giving a debtor the right to seek modification of the amount of security throughout the life of the appeal and giving the trial court continuing jurisdiction to do so. *See* Tex. R. App. P. 24.3(a). There is no compelling need for finality in this particular setting.

### **Conclusion and Prayer**

The probate court clearly abused its discretion and its order has left Relator without an adequate remedy of appeal. *Isern v. Ninth Court of Appeals*, 925 S.W.2d 604, 606 (Tex. 1996). Relator requests that the Court grant his petition for writ of mandamus and vacate the probate court's order setting supersedeas bond. Relator also requests any other relief he is entitled to recover.

Respectfully submitted,

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**Rule 52.3(J) Certification Of Facts And  
Verification of Record/Appendix**

Before me, the undersigned authority, on this day personally appeared Robert B. Gilbreath, the person whose name is subscribed below and who, on his oath, stated that (i) he is attorney for Relator; (ii) he has reviewed Relator's Petition for Writ of Mandamus and concluded that every factual statement in the petition is supported by competent evidence included in the combined appendix/record, and (iii) the items in the appendix/record are true and correct copies of the original documents.

/s/ Robert B. Gilbreath

Robert B. Gilbreath

Given under my hand and official seal of office this 13th day of June, 2018.

/s/ Kelly Lynn Lute

Notary Public, State of Texas

### **Compliance Certificate**

This document contains 2,416 words, not counting the sections exempt under Rule of Appellate Procedure 9.4. The body font is 14pt Equity Text A.

/s/ Robert B. Gilbreath

Robert B. Gilbreath

## **Service Certificate**

I certify that on June 13, 2018 I caused a true and correct copy of the foregoing to be served on the parties by and through their counsel of record on via electronic service and via email as follows:

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### **Combined Appendix/Record**

- Tab A: Arbitration Panel's Final Award (December 7, 2017).
- Tab B: Probate Court Final Judgment (February 5, 2018).
- Tab C: Probate Court Amended Final Judgment (February 21, 2018).
- Tab D: Relator's Net Worth Declaration.
- Tab E: Official Receipt for Relator's Bond Payment.
- Tab F: Real Party in Interest's Motion to Strike Deposit in Lieu of Supersedeas Bond and Contest of Net Worth Declaration of Michael Ruff.
- Tab G: Order on Real Party in Interest's Contest of Michael Ruff's Declaration of Net Worth (March 19, 2018).
- Tab H: Relator's Motion to Review Order Setting Amount of Supersedeas Bond and for Temporary Relief.
- Tab I: *Ruff v. Ruff*, No. 05-18-00326-CV, 2018 Tex. App. LEXIS 4155 (Tex. App.—Dallas June 8, 2018)