

Cause No. DC-2025-CV-2028

TB

JASON CORLEY,	§	IN THE DISTRICT COURT
<i>Plaintiff,</i>	§	
	§	
v.	§	237 TH JUDICIAL DISTRICT
	§	
MARK MEURER,	§	
<i>Defendant.</i>	§	LUBBOCK COUNTY, TEXAS

**PETITION IN INTERVENTION FOR LEAVE TO FILE
INFORMATION IN THE NATURE OF QUO WARRANTO**

TO THE HONORABLE JUDGE OF THE 237TH DISTRICT COURT:

Based on rule 60, Texas Rules of Civil Procedure, and section 66.002, Texas Civil Practice and Remedies Code, Intervenor THE STATE OF TEXAS (hereinafter “the State”), acting by and through its attorney pro tem, SCOTT BRUMLEY, the County Attorney of Potter County, Texas, files this petition to intervene in this cause, and for leave to file an information in the nature of quo warranto against Defendant MARK MEURER (hereinafter, “Defendant”), in support of which the State would respectfully show the Court as follows:

1. Intervenor’s Justiciable Interest.

1.01. A party with a justiciable interest in a pending suit may intervene in the suit as a matter of right.¹

1.02. A party has a justiciable interest, entitling it to intervene, if the party could have brought the pending action, or any part thereof, in its own name.²

1.03. Pursuant to section 66.001(1), Texas Civil Practice and Remedies Code, an action in the nature of quo warranto is available if, among other grounds, a person usurps, intrudes into, or unlawfully holds or executes an office. The allegations in

¹ *Nghiem v. Sajib*, 567 S.W.3d 718, 721 (Tex. 2019).

² *In re Union Carbide Corp.*, 273 S.W.3d 152, 155 (Tex. 2008) (orig. proceeding).

this case contend that Defendant is usurping the office lawfully held by JASON CORLEY, and that Defendant is unlawfully holding and executing that office.

1.04. Only the attorney general or the county or district attorney of the proper county may bring an action in the nature of quo warranto.³ Within that principle, the State's attorney pro tem, acting in the lawful stead of the Lubbock County Criminal District Attorney, is a proper authority to seek quo warranto relief as is requested in this cause. In sum, the attorney pro tem could have brought this action independently in the name of the State, so the State has a justiciable interest in this litigation.

2. **Authority to Litigate.**

2.01. As provided by section 66.002(b), Texas Civil Practice and Remedies Code, Intervenor states that the information in this cause is sought to be filed in the name of THE STATE OF TEXAS.

2.02. Under section 66.002(a), Texas Civil Practice and Remedies Code, the Lubbock County Criminal District Attorney would be the proper authority to represent the State in this cause. However, the Lubbock County Criminal District Attorney has recused in this matter, and on December 11, 2025, the Court appointed the undersigned County Attorney of Potter County, Texas, to represent the interests of the State in this cause as attorney pro tem.

2.03. The undersigned attorney pro tem is a currently-serving County Attorney and has been appointed by the Court to serve in the stead of the Lubbock County Criminal District Attorney in this cause. Given that only the attorney general or a county or district attorney of the proper county may file a petition for writ of quo warranto,⁴ the undersigned has lawful authority to represent the State in this case.

³ *Wilson v. State*, 977 S.W.2d 379, 380 (Tex. Crim. App. 1998).

⁴ *Reed v. Prince*, 194 S.W.3d 101, 105 (Tex. App.—Texarkana 2006, pet. denied).

3. Individual Relator.

3.01. As provided by section 66.002(c), Texas Civil Practice and Remedies Code, the State's intervention in this case is requested by JASON CORLEY.

3.02. From the filing of this Petition forward, the Court should consider JASON CORLEY to be an individual relator, as contemplated by section 66.002(c), Texas Civil Practice and Remedies Code. Accordingly, it would be proper for the Court to hereafter style this cause *The State of Texas ex rel. Jason Corley v. Mark Meurer*.

4. Attachment of Information.

4.01. A true and correct copy of the information sought to be filed by Intervenor in this cause is attached hereto as Exhibit 1.

4. Grounds for Proceeding.

Based upon the following facts, probable grounds exist for this proceeding:

4.01. On or about November 8, 2022, JASON CORLEY was duly elected to the office of county commissioner for precinct two of Lubbock County, Texas.

4.02. In accordance with section 601.003(a), Texas Government Code, JASON CORLEY took office on January 1, 2023. JASON CORLEY's current term of office will expire on December 31, 2026.

4.03. Article 16, Section 65(b) of the Texas Constitution provides that if holders of certain offices, including county commissioner, "shall announce their candidacy, or shall in fact become a candidate, in any General, Special or Primary Election, for any office of profit or trust under the laws of this State or the United States other than the office then held, at any time when the unexpired term of the office then held shall exceed one year and 30 days, such announcement or such candidacy shall constitute an automatic resignation of the office then held, and the vacancy thereby created shall be filled pursuant to law in the same manner as other vacancies for such office are filled."

4.04. To trigger the automatic resignation consequence of article 16, section

65(b), an announcement of candidacy or commencement of candidacy in fact must occur more than one year and 30 days before the term of the office then held ends. Tex. Const. art. XVI, § 65(b). Because JASON CORLEY's current term of office ends on December 31, 2026, a qualifying announcement or commencement of candidacy in fact in JASON CORLEY's case would have had to occur on or before December 1, 2025.

4.05. On or about November 12, 2025, JASON CORLEY announced the formation of an exploratory committee to advise him on whether he should run for U.S. Representative for District 19 of Texas. JASON CORLEY's announcement of the exploratory committee did not represent an unconditional announcement of intent to run for the congressional seat.

4.06. JASON CORLEY did not publicly announce his candidacy for U.S. Representative for District 19 of Texas before December 2, 2025.

4.07. On December 2, 2025, JASON CORLEY announced that he was running for U.S. Representative for District 19 of Texas and he filed his application for place on the ballot in the Republican Party Primary for that position on December 3, 2025.

4.08. Since JASON CORLEY did not announce his candidacy or become a candidate in fact for U.S. Representative for District 19 of Texas when more than one year and 30 days remained in his term of office as county commissioner for Precinct 2 of Lubbock County, JASON CORLEY did not automatically resign his office as county commissioner.

4.09. Despite the fact that the automatic resignation provision of article 16, section 65(b) of the Texas Constitution was not triggered with respect to JASON CORLEY, on December 8, 2025, the Lubbock County Judge purported to find that JASON CORLEY had automatically resigned his office by announcing his candidacy for U.S. Representative for District 19 of Texas and by becoming a candidate in fact for that position. Proceeding from that finding, which was not lawful, the Lubbock County Judge then purported to appoint Defendant MARK MEURER as county

commissioner for precinct 2.

4.10. Since article 16, section 65(b) was not lawfully triggered with respect to JASON CORLEY, he did not automatically resign and he remains the lawful holder of the office of county commissioner for precinct 2 of Lubbock County, Texas. By virtue of that fact, Defendant is not the lawful occupant of the office of county commissioner for precinct 2 of Lubbock County, Texas.

4.11. Defendant has not resigned and continues to purport to hold the office of county commissioner for precinct 2 of Lubbock County, Texas, despite the fact that JASON CORLEY did not automatically resign from that office. Consequently, Defendant is unlawfully holding and executing the office of county commissioner for precinct 2 of Lubbock County, Texas, which is created by authority of the Constitution of the State of Texas.

4.12. Accordingly, probable grounds exist for a proceeding in quo warranto against Defendant.

5. Prayer.

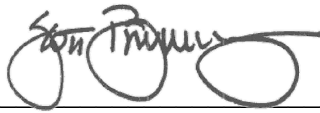
WHEREFORE, PREMISES CONSIDERED, Intervenor respectfully requests that the Court enter an order:

- A. granting leave to Intervenor to file an information in the nature of quo warranto;
- B. requiring that the information in the nature of quo warranto be filed;
- C. requiring the issuance and service of process; and
- D. granting to Intervenor such other and further relief to which it may be justly entitled.

DATED: December 16, 2025.

Respectfully submitted,

SCOTT BRUMLEY
POTTER COUNTY ATTORNEY
500 South Fillmore, Room 301
Amarillo, Texas 79101
Telephone: 806/379-2255
Telecopier: 806/379-2265
Email: scottbrumley@co.potter.tx.us

By: _____

Scott Brumley
Potter County Attorney
Texas State Bar No. 00783738

ATTORNEY PRO TEM FOR
INTERVENOR,
THE STATE OF TEXAS

CERTIFICATE OF SERVICE

The undersigned certifies, as required by Tex. R. Civ. P. 21a, that the foregoing document has been served upon all attorneys who have appeared in this action through the State's electronic filing manager.

SIGNED on December 16, 2025.



Scott Brumley
Attorney pro tem for the State of Texas

THE STATE OF TEXAS <i>ex rel.</i>	§	IN THE DISTRICT COURT
JASON CORLEY,	§	
<i>Plaintiff,</i>	§	
	§	237 TH JUDICIAL DISTRICT
v.	§	
	§	
MARK MEURER,	§	
<i>Defendant.</i>	§	LUBBOCK COUNTY, TEXAS

INFORMATION IN THE NATURE OF QUO WARRANTO

TO THE HONORABLE JUDGE OF THE 237TH DISTRICT COURT:

Based on chapter 66, Texas Civil Practice and Remedies Code, Intervenor THE STATE OF TEXAS (hereinafter, “the State”), with leave of the Court, files this information in the nature of quo warranto, complaining of Defendant MARK MEURER, in support of which the State would respectfully show the Court as follows:

1. Statement Of Discovery Control Plan.

1.01. In accordance with TEX. R. CIV. P. 190.1, the State declares its intent that discovery in this cause proceed under Level 3, as provided by TEX. R. CIV. P. 190.4.

1.02. Based upon the preceding statement of intent, the State respectfully requests that the Court order a discovery control plan tailored to the circumstances of this action.

2. Statement of Relief Sought.

2.01. The State declares that this action is not a suit governed by the Texas Family Code.

2.02. In compliance with Tex. R. Civ. P. 47(c), the State declares that only non-monetary relief is sought in this case.

3. Parties.

3.01. Intervenor/Plaintiff is THE STATE OF TEXAS, proceeding by and through the County Attorney of Potter County, Texas whom the Court has appointed

as attorney pro tem in this cause. *See* Tex. Civ. Prac. & Rem. Code § 66.002(a).

3.02. Based on section 66.002(c) of the Texas Civil Practice and Remedies Code, the State represents that JASON CORLEY, the original Plaintiff in this cause, has requested the filing of this information.

3.03. Defendant MARK MEURER is an individual residing in Lubbock County, Texas. Defendant should be served with process by personal delivery to him of citation together with a copy of this information attached at 904 Broadway Street, Lubbock, Texas 79401, or wherever he may be found.

4. Jurisdiction And Venue.

4.01. This Court has jurisdiction over the subject matter of this cause and the persons of the parties thereto under article V, section 8 of the Texas Constitution and section 66.002 of the Texas Civil Practice and Remedies Code.

4.02. Venue of this cause is proper in this Court under sections 15.002(a)(2) and (3) and 66.002 of the Texas Civil Practice and Remedies Code, for the reasons that this Court has jurisdiction in Lubbock County, Texas and that Lubbock County, Texas is the county in which all or a substantial part of the events or omissions giving rise to the claims at issue occurred. Concurrently, Lubbock County, Texas is — and was — the county of Defendant's residence, both currently and at the time of accrual of the cause of action which is the basis of this lawsuit.

5. Underlying Facts.

5.01. The office of county commissioner exists in Texas under authority of article 5, section 18(b) of the Texas Constitution.

5.02. On or about November 8, 2022, JASON CORLEY was duly elected to the office of county commissioner for precinct two of Lubbock County, Texas.

5.03. In accordance with section 601.003(a), Texas Government Code, JASON CORLEY took office on January 1, 2023. JASON CORLEY's current term of office will expire on December 31, 2026.

5.04. Article 16, Section 65(b) of the Texas Constitution provides that if holders

of certain offices, including county commissioner, “shall announce their candidacy, or shall in fact become a candidate, in any General, Special or Primary Election, for any office of profit or trust under the laws of this State or the United States other than the office then held, at any time when the unexpired term of the office then held shall exceed one year and 30 days, such announcement or such candidacy shall constitute an automatic resignation of the office then held, and the vacancy thereby created shall be filled pursuant to law in the same manner as other vacancies for such office are filled.”

5.05. To trigger the automatic resignation consequence of article 16, section 65(b), an announcement of candidacy or commencement of candidacy in fact must occur more than one year and 30 days before the term of the office then held ends. Tex. Const. art. XVI, § 65(b). Because JASON CORLEY’s current term of office ends on December 31, 2026, a qualifying announcement or commencement of candidacy in fact in JASON CORLEY’s case would have had to occur on or before December 1, 2025.

5.06. On or about November 12, 2025, JASON CORLEY announced the formation of an exploratory committee to advise him on whether he should run for U.S. Representative for District 19 of Texas. JASON CORLEY’s announcement of the exploratory committee did not represent an unconditional announcement of intent to run for the congressional seat.

5.07. JASON CORLEY did not publicly announce his candidacy for U.S. Representative for District 19 of Texas before December 2, 2025.

5.08. On December 2, 2025, JASON CORLEY announced that he was running for U.S. Representative for District 19 of Texas and he filed his application for place on the ballot in the Republican Party Primary for that position on December 3, 2025.

5.09. Since JASON CORLEY did not announce his candidacy or become a candidate in fact for U.S. Representative for District 19 of Texas when more than one year and 30 days remained in his term of office as county commissioner for Precinct 2 of Lubbock County, JASON CORLEY did not automatically resign his office as county commissioner.

5.10. Despite the fact that the automatic resignation provision of article 16, section 65(b) of the Texas Constitution was not triggered with respect to JASON CORLEY, on December 8, 2025, the Lubbock County Judge purported to find that JASON CORLEY had automatically resigned his office by announcing his candidacy for U.S. Representative for District 19 of Texas and by becoming a candidate in fact for that position. Proceeding from that finding, which was not lawful, the Lubbock County Judge then purported to appoint Defendant MARK MEURER as county commissioner for precinct 2.

5.11. Since article 16, section 65(b) was not lawfully triggered with respect to JASON CORLEY, he did not automatically resign and he remains the lawful holder of the office of county commissioner for precinct 2 of Lubbock County, Texas. By virtue of that fact, Defendant is not the lawful occupant of the office of county commissioner for precinct 2 of Lubbock County, Texas.

5.12. Defendant has not resigned and continues to purport to hold the office of county commissioner for precinct 2 of Lubbock County, Texas, despite the fact that JASON CORLEY did not automatically resign from that office.

6. Grounds For Quo Warranto.

6.01. Pursuant to section 66.001(1), Texas Civil Practice and Remedies Code, an action in the nature of quo warranto is available if a person usurps, intrudes into, or unlawfully holds or executes an office.

6.02. Since JASON CORLEY did not announce his candidacy for U.S. Representative for District 19 of Texas at any time when his unexpired term of office exceeded one year and 30 days, he did not automatically resign from office. *See* Tex. Const., art. XVI, § 65(b).

6.03. Since JASON CORLEY did not become a candidate in fact for U.S. Representative for District 19 of Texas when his unexpired term of office exceeded one year and 30 days, he did not automatically resign from office. *See* Tex. Const., art. XVI, § 65(b).

6.04. In the absence of applicability of article 16, section 65(b), the Lubbock County Judge had no lawful authority to find or declare that JASON CORLEY had automatically resigned and thereby created a vacancy in the office of county commissioner for precinct 2 of Lubbock County. Since no vacancy in the office existed, the appointment of Defendant MARK MEURER to the office of county commissioner for precinct 2 of Lubbock County was unlawful and void.

6.05. As of the filing of this Defendant continues to purport to hold the office of county commissioner for precinct 2 of Lubbock County, despite having no lawful basis to hold that office. Accordingly, the writ of quo warranto should be issued against Defendant, thereby adjudging the ouster of Defendant from the office of county commissioner for precinct 2 of Lubbock County, Texas, and returning JASON CORLEY to his lawful occupation and enjoyment of that office.

7. Request for Interim Relief.

7.01. Plaintiff JASON CORLEY has requested interim relief, ordering that JASON CORLEY continues to lawfully hold the office of county commissioner for precinct 2 of Lubbock County, Texas, and that Defendant currently unlawfully holds the office. *See* Count 3, County Comm'r Jason Corley's First Am. Pet.

7.02. The State agrees that Defendant is unlawfully holding the office of county commissioner for precinct 2 of Lubbock County, Texas. and that the Court should enter orders during the pendency of this litigation to prevent further violation of the law. Accordingly, the State joins and adopts by reference Count 3 of Plaintiff JASON CORLEY's First Amended Petition.

H. Prayer.

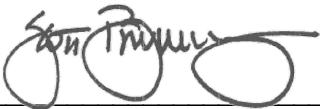
Based upon the foregoing, and section 66.003, Texas Civil Practice and Remedies Code, the State respectfully requests judgment of the Court that:

1. Defendant unlawfully holds and is unlawfully executing the office of county commission for precinct 3 of Lubbock County, Texas, and thus is guilty as charged in this Information;

2. Defendant be removed from the office of county commissioner for precinct 2 of Lubbock County, Texas;
3. JASON CORLEY be reinstated to the office of county commissioner for precinct 2 of Lubbock County, Texas;
4. Defendant be enjoined from acting as county commissioner for precinct 2 of Lubbock County, Texas, during the pendency of this litigation as set forth in this information; and
5. Plaintiff have such other and further relief to which it may be justly entitled.

Respectfully submitted,

SCOTT BRUMLEY
Potter County Attorney
500 South Fillmore, Room 301
Amarillo, Texas 79101
Telephone: 806/379-2255
Telecopier: 806/379-2265
Email: scottbrumley@co.potter.tx.us

By: _____

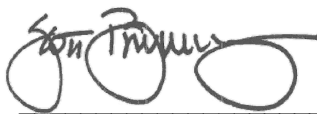
Scott Brumley
Potter County Attorney
Texas State Bar No. 00783738

ATTORNEY PRO TEM FOR
INTERVENOR,
THE STATE OF TEXAS

CERTIFICATE OF SERVICE

The undersigned certifies, as required by Tex. R. Civ. P. 21a, that the foregoing document has been served upon all attorneys who have appeared in this action through the State's electronic filing manager.

SIGNED on December 16, 2025.

A handwritten signature in black ink, appearing to read "Scott Brumley", written over a horizontal line.

Scott Brumley
Attorney pro tem for the State of Texas

Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Campbell Brumley

Bar No. 783738

scottbrumley@co.potter.tx.us

Envelope ID: 109178851

Filing Code Description: Counter Claim/Cross

Action/Interpleader/Intervention/Third Party

Filing Description: Petition in Intervention for Leave to File Information in the Nature of Quo Warranto

Status as of 12/17/2025 8:27 AM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Kristen Vander-PlasLaFreniere		kvp@vplflaw.com	12/16/2025 5:23:40 PM	SENT
David LaFreniere		david@vplflaw.com	12/16/2025 5:23:40 PM	SENT
Benjamin P.Garcia		ben@benjamingarcialaw.com	12/16/2025 5:23:40 PM	SENT
Brandi Deatherage		bdeatherage@lubbockcounty.gov	12/16/2025 5:23:40 PM	SENT
Mark Meurer		mmeurer@lubbockcounty.gov	12/16/2025 5:23:40 PM	SENT
Scott Brumley		countyattorney@co.potter.tx.us	12/16/2025 5:23:40 PM	ERROR