

NO. 12-13-00302-CV

**IN THE COURT OF APPEALS
FOR THE TWELFTH DISTRICT OF TEXAS**

LG ELECTRONICS, USA, INC. AND RENT-A-CENTER TEXAS. L.P.

v.

JESSICA GRIGG, JENNIFER ALMARAZ AND JUSTIN LUKE, INDIVIDUALLY

**APPEAL FROM THE 159TH JUDICIAL DISTRICT COURT OF
ANGELINA COUNTY, TEXAS
CAUSE No. CV-01745-12-09
THE HONORABLE PAUL WHITE PRESIDING**

**BRIEF OF APPELLANT
LG ELECTRONICS, USA, INC.**

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STATEMENT REGARDING ORAL ARGUMENT

LG Electronics, USA, Inc. does not request oral argument. LG Electronics, USA, Inc. suggests that oral argument is not necessary and that the issues presented can be determined upon the briefs and the record. However, if the Court believes oral argument would be helpful, LG Electronics, USA, Inc. is happy to present oral argument upon the Court's request.

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**BRIEF OF APPELLANT
LG ELECTRONICS, USA, INC.**

TO THE HONORABLE COURT OF APPEALS:

Appellant, LG ELECTRONICS, USA, INC., submits this brief in support of its interlocutory appeal of the trial court's denial of LG's Motion for Partial Summary Judgment, and would respectfully show unto the Court the following:

STATEMENT OF THE CASE

Appellees, Jessica Grigg (“Grigg”), Jennifer Almaraz (“Almaraz”) and Justin Luke (“Luke”), in their individual capacities, have asserted wrongful death claims against appellants, LG Electronics, USA, Inc. (“LG”) and Rent-A-Center Texas, L.P. (“RAC”), for the death of their biological father, Ellis B. Luke, Jr. (“Ellis Luke”), who died in October of 2011.¹ LG and RAC filed motions for partial summary judgment in the trial court seeking summary judgment on the appellees’ wrongful death claims against them on the grounds that the court orders terminating the parent-child relationships divested the respondents of the legal right to bring wrongful death claims under the Texas Wrongful Death Act for the death of Ellis Luke.

After holding hearings, the trial court denied the motions by written orders dated September 16, 2013.² On September 18, 2013, the trial court entered an order permitting interlocutory appeal of its rulings on LG and RAC’s motions pursuant to §51.014(d) of the Texas Civil Practice and Remedies Code and Rule 168 of the Texas Rules of Civil Procedure.³ This Court granted LG and RAC’s petitions for interlocutory appeal on October 18, 2013.

¹ See Plaintiffs’ Original Petition (CR00008-000019); Grigg and Almaraz, on behalf of Ellis Luke’s estate, have also asserted claims against LG and RAC pursuant to the Texas Survival Statute.

² CR000140 and CR000141.

³ CR000142

ISSUE PRESENTED

Whether the court-ordered termination of parental rights pursuant to the Texas Family Code divests the affected persons of the legal right to sue a third-party for the death of the other as parent and child under the Texas Wrongful Death Act.

STATEMENT OF FACTS

In the underlying lawsuit, Appellees contend that on December 2, 2010 a television manufactured by LG, and rented to Ellis Luke by RAC, started a fire in Ellis Luke's home.⁴ Though Ellis Luke extinguished the fire, Appellees claim that he inhaled smoke and sustained injuries to his lungs, which ultimately led to his death ten months later.⁵ Appellees subsequently asserted claims against LG and RAC for wrongful death under the Texas Wrongful Death Act ("the Act"), Texas Civil Practice and Remedies Code section 71.001 *et seq*, alleging that they are proper wrongful death beneficiaries under the Act because they are the biological children of Ellis Luke.⁶

While Ellis Luke may have been the Appellees' biological father, he voluntarily relinquished his parental rights as to all three Appellees, which resulted in two separate court orders terminating each of the parent-child relationships,

⁴ See Plaintiffs' Original Petition (CR000008-000019).

⁵ *Id.*

⁶ *Id.*

many years before his death. Specifically, on May 2, 1989, Ellis Luke executed a Voluntary Affidavit of Relinquishment of Parental Rights as to his daughter Jessica Grigg, and on May 8, 1981 the 217th Judicial District Court of Angelina County entered an Agreed Decree of Termination.⁷ On December 6, 1994, Ellis Luke executed a Voluntary Affidavit of Relinquishment of Parental Rights as to his daughter Jennifer Almaraz, and his son Justin Luke, and on February 27, 1995, the County Court at Law for Nacogdoches County entered a Decree of Termination.⁸ Both termination orders expressly state that that parent-child relationship between Ellis Luke and each Appellee has been terminated.⁹

SUMMARY OF THE ARGUMENT

At common law, a claim for personal injuries expired upon the claimant's death, and the decedent's survivors had no claim against a party who may have negligently caused the decedent's death.¹⁰ The Texas legislature, however, enacted the Texas Wrongful Death Act and created a statutory cause of action for wrongful death for the exclusive benefit of the parents, children and spouse of a decedent.¹¹ Consequently, the right to bring a wrongful death claim is a legal right which is

⁷ See Exhibits "D" and "E" to LG's Motion for Partial Summary Judgment (CR000102-000112).

⁸ See Exhibits "F" and "G" to LG's Motion for Partial Summary Judgment (CR000113-000123).

⁹ CR000102-000123.

¹⁰ See *Rose v. Doctors Hosp.*, 801 S.W.2d 841, 845 (Tex. 1990).

¹¹ Tex. Civ. Prac. & Rem. Code §71.004(a).

conferred by the Texas legislature as the Wrongful Death Act.¹²

Prior to the death of Ellis Luke, the parent-child relationships between him and each of the Appellees were terminated by court orders entered under the Texas Family Code.¹³ Section 161.206(b) of the Family Code provides that an order terminating parental rights divests the affected parent and child of *all legal rights* with respect to one another.¹⁴ The only exception is that the child retains the right to inherit from the parent unless the order provides otherwise.¹⁵ Since the right to bring a wrongful death claim is a legal right conveyed by the Wrongful Death Act, an order terminating parental rights divests the affected parent and child of the right to bring a claim under the Wrongful Death Act for the death of the other.¹⁶

As a result of the orders terminating Ellis Luke's parental rights as to Jessica Grigg, Jennifer Almaraz and Justin Luke, Appellees are no longer beneficiaries under the Wrongful Death Act with respect to Ellis Luke, and no longer have the legal right to bring wrongful death claims related to his death. Consequently, the trial court erred in denying LG's motion for partial summary judgment as to the Appellee's wrongful death claims against it herein.

¹² See *In re LaBatt Food Serv.*, 279 S.W.3d 640, 644 (Tex. 2009); see also Tex. Civ. Prac. & Rem. Code §71.004(a).

¹³ CR000102-000123.

¹⁴ Tex. Fam. Code §161.206(b).

¹⁵ *Id.*

¹⁶ See *Go International v. Lewis*, 601 S.W.2d 495, 498-99 (Tex.App.—El Paso 1980, writ ref'd n.r.e.).

ARGUMENT AND AUTHORITIES

A. APPELLEES LACK STANDING TO BRING WRONGFUL DEATH CLAIMS BASED ON ELLIS LUKE’S DEATH BECAUSE COURT ORDERS HAVE TERMINATED THEIR PARENT-CHILD RELATIONSHIPS WITH ELLIS LUKE

Appellees have no standing to assert wrongful death claims based on Ellis Luke’s death. Analysis of the Wrongful Death Act in the context of the existing statutory framework and Texas jurisprudence,¹⁷ as well as the presumption that all statutes are “enacted by the legislature with full knowledge of the existing condition[s] of the law and with reference to it,”¹⁸ establishes that the court orders terminating Ellis Luke’s legal parent-child relationships with the Appellees have divested them of standing to bring the wrongful death actions underlying this case.

As an initial matter, the plain language of the Wrongful Death Act limits its applicability to the surviving spouse, children and parents of the deceased.¹⁹ Texas courts have interpreted this language narrowly and have refrained from expanding its scope.²⁰ For example, the statute does not apply to grandparents, foster parents,

¹⁷ *Id.*; see also *Acker v. Texas Water Comm’n*, 790 S.W.2d 299, 301 (Tex. 1990).

¹⁸ *McBride v. Clayton*, 166 S.W.2d 125, 128 (Tex. 1942).

¹⁹ See *In re LaBatt Food Serv.*, 279 S.W.3d 640, 644 (Tex. 2009); see also Tex. Civ. Prac. & Rem. Code §71.004(a).

²⁰ See, e.g. *Cavanugh v. Jones*, 863 S.W.2d 551 (Tex.App.—Austin 1993, writ denied) (grandparents are not beneficiaries under the Wrongful Death Act); *Taylor v. Parr*, 678 S.W.2d 527 (Tex.App.—Houston [14th Dist.] 1984, writ ref’d n.r.e.) (foster parents are not beneficiaries under the Wrongful Death Act); *Hogan v. Hearst Corp.*, 945 S.W.2d 246 (Tex.App.—San Antonio 1997, no writ) (siblings are not beneficiaries under the Wrongful Death Act); and *Goss v. Franz*, 287 S.W.2d 289 (Tex.App.—Amarillo 1956, writ ref’d) (child who was raised by, but not formally adopted by, decedent was not a beneficiary under the Wrongful Death Act).

siblings, or informal parent-child relationships,²¹ but does give standing to persons legally adopted under the statutes of the Family Code.²²

Moreover, the Texas Family Code addresses the effect of court orders terminating parent-child relationships. Pursuant to Section 161.206(b), “an order terminating the parent-child relationship divests the parent and child of *all legal rights* with respect to each other.”²³ The only exception is that the child retains the right to inherit from and through the parent unless the order provides otherwise.²⁴ A wrongful death claim is not an inheritance claim, since any recovery under the Wrongful Death Act is paid directly to the specifically enumerated beneficiaries and not through the decedent’s estate.²⁵

The right to bring a wrongful death claim is a *legal right* conferred by the Texas legislature through the Wrongful Death Act. Since a termination order divests the parent and child “of all *legal rights*” with respect to each other, it necessarily divests them of the right to bring a claim under the Wrongful Death Act.²⁶

The El Paso Court of Appeals addressed precisely this issue in *Go*

²¹ *Id.*

²² *See Transport Ins. Co. v. Faircloth*, 898 S.W.2d 269, 274-75 (Tex. 1995) (citing *Goss*, 287 S.W.2d at 290)

²³ Tex. Fam. Code §161.206(b).

²⁴ *Id.*

²⁵ *See Go International*, 601 S.W.2d at 498; *see also Haley v. Nova Research, Inc.*, 2005 WL 701036 (N.D. Tex. 2005).

²⁶ *Go International*, 601 S.W.2d at 498-99.

International, where it held that an order terminating the parent-child relationship meant that two of the decedents' biological children were not their "children" for purposes of the Wrongful Death Act. In that case, the five biological children of two individuals killed in a head-on collision with a truck filed wrongful death claims against the truck driver and his employer. Two of the children, however, had previously been adopted by an aunt. After trial, judgment was entered in favor of all five claimants.²⁷

On appeal, the defendants argued that the court should not have entered judgment in favor of the two adopted children because they were no longer the "children" of the decedents for the purposes of the Wrongful Death Act.²⁸ The El Paso Court of Appeals agreed, holding that the adopted children were no longer "children" within the meaning of the act because an order terminating the parent-child relationship results in the termination of all legal rights.²⁹ Therefore, the adopted children were not entitled to recover for the wrongful death of their biological parents.³⁰ In reaching this conclusion, the Court reasoned that a wrongful death claim is purely statutory, as is an order terminating the parent-child

²⁷ *Id.* at 495-96.

²⁸ *Id.* at 498.

²⁹ *Id.* at 489-99.

³⁰ *Id.* (citing *Patton v. Shamburger*, 431 S.W.2d 506 (Tex. 1968) (under workmen's compensation statute, adopted children were not entitled to benefits through their deceased natural father)).

relationship.³¹ If the legislature had intended to make an exception with regard to those rights that accrue under the Wrongful Death Act, it could easily have done so.³² The United States District Court for the Northern District of Texas, Dallas Division, was faced with the same question as the *Go International* court and reached the same conclusion in *Haley v. Nova Research, Inc.*³³

Although the case at bar does not involve an adoption, the *Go International* and *Haley* holdings apply here because they depend upon the *effect* of terminating the parent-child relationship, not the subsequent adoption of the children. The *Go International* and the *Haley* courts interpreted the same provision of the Texas Family Code applicable to the facts of this case, and neither court's opinion suggests that a termination order entered in connection with an adoption is to be treated differently than a termination order entered in connection with a divorce/voluntary termination proceeding.³⁴ Other courts have similarly recognized that the absence of a parent-child relationship renders prospective plaintiffs without standing to bring a wrongful death action under Texas law.³⁵

³¹ *Id.*

³² *Id.*

³³ See *Haley v. Nova Research, Inc.*, 2005 WL 701036 (N.D. Tex. 2005).

³⁴ The *Go International* and *Haley* courts cite former Tex. Fam. Code §15.07 which was repealed and recodified as Tex. Fam. Code §161.206 by Act of April 20, 1995, 74th Leg., R.D., Ch. 20, §1.

³⁵ See, e.g., *Byrnes v. Ford Motor Co.*, 642 F. Supp. 309 (E.D. Tex. 1986) (wrongful death claim for death of soon-to-be adopted child was barred where plaintiff had not actually completed adoption of the child).

The Family Code was recodified in 1995, fifteen years after the *Go International* decision, but the Texas Legislature enacted no statutory language providing that the right of a child or parent to bring a claim under the Wrongful Death Act would survive a termination order under the Family Code. Likewise, despite its clear opportunity to do so, the legislature did not provide that adoption is a prerequisite for the divestiture of any legal rights in connection with the termination of parental rights. The legislature’s decision to enact language specifying that the child retains the right to inherit from and through the parent unless the applicable termination order provides otherwise,³⁶ however, demonstrates that it was aware of the significance of such orders. Nevertheless, it did not change the language relevant to this case. Section 161.206(b) of the Family Code states that, “an order terminating the parent-child relationship divests the parent and child of *all legal rights* with respect to each other.”³⁷

Despite the clear language in *Go International* and *Haley*, and evidence that the legislature approves of these holdings, Appellees have nonetheless argued that a termination order can only divest a child of the legal right to bring a wrongful death claim for the death of a biological parent if that child is subsequently

³⁶ Tex. Fam. Code §161.206(b).

³⁷ *Id.*

adopted.³⁸ This position is neither supported by the caselaw nor by the language of the Family Code. Section 161.206(b) of the Family Code reads, “an order terminating the parent-child relationship divests the parent and child of all legal rights with respect to each other.”³⁹ Appellees would instead have the Court read that statute as saying, “an order terminating the parent-child relationship, [*when accompanied by a subsequent adoption of the affected children*] divests the parent and child of all legal rights with respect to each other.” When the language of a statute is clear and unambiguous, the statute must be given effect as written.⁴⁰

B. THE CASES RELIED ON BY APPELLEES ARE DISTINGUISHABLE AND DO NOT ADDRESS THE LEGAL QUESTION UNDERLYING THIS CASE

In denying LG’s motion for partial summary judgment, the trial court appears to have been primarily persuaded by the Texas Supreme Court and court of appeals decisions in *Brown v. Edwards Transfer Co., Inc.*, *Garza v. Maverick Meat Market* and *Buster v. Metropolitan Transit Authority*, three cases cited by Appellees in their response to LG’s motion for partial summary judgment.⁴¹ None of these cases, however, is on point. Each holds that it is improper to apply definitions from statutory provisions other than the Wrongful Death Act for the

³⁸ See Plaintiff’s Response to LG Electronics, USA, Inc.’s Traditional Motion for Partial Summary Judgment (CR000132-000139).

³⁹ Tex. Fam. Code §161.206(b).

⁴⁰ *Board of Ins. Com’rs of Texas v. Guardian Life Ins. Co. of Texas*, 180 S.W.2d 906 (Tex. 1944).

⁴¹ *Brown v. Edwards Transfer Co., Inc.*, 764 S.W.2d 220 (Tex. 1998); *Garza v. Maverick Market, Inc.*, 768 S.W.2d 273 (Tex. 1989); *Buster v. Metropolitan Transit Authority*, 835 S.W.2d 236 (Tex.App.—Houston [14th Dist] 1992, no pet.).

purposes of determining whether an individual may bring a wrongful death claim, but none addresses the effects of a court order terminating the parent-child relationship between the decedent and prospective claimant.

The *Brown* case addressed whether “children” under the Wrongful Death Act includes both legitimate and illegitimate children, where three illegitimate children of a man killed in a freight elevator accident filed claims against the elevator manufacturer and the decedent’s employer pursuant to the Wrongful Death Act. Defendant Edwards Transfer Co., Inc. argued that the court should interpret the word “children” in accordance with the *definitions* set forth in the Probate Code. Specifically, the definition section of the Probate Code provided that “the unrecognized illegitimate child of a father is not the ‘child’ of the putative father *for the purposes of the Probate Code.*”⁴² Recognizing that wrongful death benefits do not belong to the decedent’s estate, however, and that wrongful death actions do not inure to the benefit of the children by reason of inheritance, the *Brown* court held that the Probate Code is not intended to *define* the classes of persons entitled to sue under the Wrongful Death Act. Consequently, *Brown* simply refused to apply the definition of “children” from the probate code to the Wrongful Death Act, and held that “children” under the Wrongful Death Act

⁴² See *Brown*, 764 S.W.2d at 222 (citing Tex. Prob. Code Ann. §3(b)) (emphasis added).

includes both legitimate and illegitimate children.⁴³ Moreover, the *Brown* court reasoned that the Texas probate code dealt with inherited estates and its concomitant descent and distribution provisions. The Wrongful Death Act did not pertain to matters of inheritance but upon a separate legal right of recovery, and therefore the definition of “children” as contained in the probate code did not apply.⁴⁴

Similarly, *Garza* also rejected an attempt to apply a definition taken from another statutory provision for purposes of a wrongful death claim. In that case, a wrongful death claim was brought on behalf of a minor child who was unborn at time of his putative father’s death.⁴⁵ The child’s mother, who was thirteen years old at the time, had told the decedent that she might be pregnant, but those suspicions were not confirmed until after his death.⁴⁶ After trial, the trial court directed a verdict in favor of the defendant on the wrongful death claim, concluding that the minor child was not entitled to recover because he was not “recognized” as the son of the decedent.⁴⁷ Citing *Brown*, the Texas Supreme Court determined that the Family Code, like the Probate Code, is not intended to *define* classes of persons entitled to sue under the Wrongful Death Act, and that it would be inappropriate to incorporate the definition of legitimization under the Family

⁴³ *Id.*

⁴⁴ *Id.* at 222-23.

⁴⁵ *Garza*, 768 S.W.2d at 274.

⁴⁶ *Id.*

⁴⁷ *Id.*

Code into the Wrongful Death Act.⁴⁸ Consequently, the *Garza* opinion simply advances *Brown*, in that an illegitimate child does not have to be “recognized” in accordance with the Family Code to be considered a child under the Wrongful Death Act.⁴⁹

Finally, in *Buster*, the appellant claimed to be the common-law husband of a motorist killed in an accident with a city bus and brought a wrongful death claim against the bus operator.⁵⁰ In a separate proceeding, a probate court had determined that appellant was the husband of the decedent and her sole surviving heir. In the wrongful death action, however, the decedent’s mother challenged appellant’s beneficiary status, instead claiming that she was the decedent’s sole statutory beneficiary.⁵¹ Though appellant contended that the probate court finding was determinative in the wrongful death action, the trial court held that the defendant was not collaterally estopped from challenging the existence of a common-law marriage in the wrongful death action.⁵² Citing *Brown* and *Garza*, the court of appeals decided that while the Texas probate code set forth a comprehensive system for the settlement partition and distribution of property among heirs of the estate, it had no application to the determination of benefits conferred under the Wrongful Death Act. Instead, the *Buster* court decided that the

⁴⁸ *Id.* at 275.

⁴⁹ *Id.*

⁵⁰ *Buster*, 835 S.W.2d at 237.

⁵¹ *Id.*

⁵² *Id.*

definition of the “the classes of persons entitled to sue under the Wrongful Death Act are to be determined in the wrongful death case and not in the probate action.”⁵³

At the outset, *Brown*, *Garza* and *Buster* have no application to the facts of this case. First, Appellant is not attempting to use the definitions of the heirship provisions of the Texas probate code to determine the class of persons entitled to recover under the Texas Wrongful Death Act. More importantly, neither *Brown*, *Garza* nor *Buster* addresses the effect of a termination order on the standing of a wrongful death beneficiary to bring a wrongful death claim. Instead, *Brown*, *Garza* and *Buster* simply stand for the proposition that one cannot look to another statutory scheme, such as the Texas Probate Code, for a *definition* to supplement an undefined term in the Wrongful Death Act or to *define* a class of persons entitled to sue under it. For example, it is not permissible to look to the Probate Code to draw the conclusion that since “children” under the Probate Code does not include illegitimate children, “children” under the Wrongful Death Act similarly excludes illegitimate children.⁵⁴

LG does not rely on the Family Code for any definition whatsoever. More importantly, Appellant has not cited the Family Code as the source for defining the class of persons entitled to sue under the Wrongful Death Act. Instead, LG has

⁵³ *Id.*

⁵⁴ *Brown*, 764 S.W.2d at 222

relies on the Family Code solely as the basis for showing the **legal effect** of the two termination orders in question, both of which were entered pursuant to the Family Code. LG has not contested that the Appellees are the biological children of Ellis Luke, or that they belong to a class of persons ordinarily granted the legal right to sue for his death under the Wrongful Death Act. Instead, LG simply points to the black letter law of the Family Code provision under which the two termination orders in question were entered. Pursuant to section 161.206(b) of the Family Code, the termination orders terminated *all legal rights* the Plaintiffs had as to their biological father, including the legal right to sue under the Wrongful Death Act for his death.⁵⁵ While Plaintiffs may belong to the right class of persons as defined by the Texas Wrongful Death statute, the termination orders extinguish their legal rights to bring their claims under the Wrongful Death Act.⁵⁶

In the present matter, therefore, the termination of each parent-child relationship divests the Appellees of standing to sue for the wrongful death of their biological father, Ellis Luke. Consequently, the trial court erred in denying LG's motion for partial summary judgment as to Appellees' wrongful death claims against it. LG respectfully requests, therefore, that this Court reverse the judgment of the trial court and render judgment in favor of Appellant that Appellees take

⁵⁵ Tex. Fam. Code §161.206(b); see also *See Go International*, 601 S.W.2d at 498; see also *Haley v. Nova Research, Inc.*, 2005 WL 701036 (N.D. Tex. 2005).

⁵⁶ *Id.*

nothing by way of their claims against LG for wrongful death.

CONCLUSION

While Appellees claim to be the biological children of Ellis Luke, those parent-child relationships were terminated by two separate court orders entered under the Texas Family Code. Pursuant to Section 161.206(b) of the Family Code, a termination order divests the parent and child of all legal rights with respect to one another. A wrongful death claim is a statutory claim created by the Wrongful Death Act and is, therefore, a legal right conferred by the legislature, meaning that the affected individuals lose this right as the result of a parental right termination order. Since the parent-child relationships between Appellees and Ellis Luke were terminated, Appellees do not have standing to bring claims against LG for wrongful death under the Wrongful Death Act. Consequently, this Court should reverse the judgment of the trial court and render judgment that Appellees take nothing by way of their claims against LG for wrongful death.

PRAYER

WHEREFORE, PREMISES CONSIDERED, Appellant, LG ELECTRONICS, USA, INC., prays that this Court reverse the judgment of the trial court, render judgment that Appellees take nothing by way of their claims against LG for wrongful death, and for such other and further relief, both at law and in equity, to which it may be entitled.

Respectfully submitted,

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LG ELECTRONICS, USA, INC.**

CERTIFICATE OF COMPLIANCE

I hereby certify that the Brief of Appellant LG Electronics, Inc. complies with the typeface requirements of Tex. R. App. P. 9.4(e) because it has been prepared in a conventional typeface no smaller than 14-point for text and 12-point for footnotes. This document also complies with the word-count limitations of Tex. R. App. P. 9.4(i) because it contains 4,299 words, excluding any parts exempted by Tex. R. App. P. 9.4(i)(1). The word-count was obtained using the word-count function of Microsoft Word, the computer program used to prepare the document.

MANNING, GOSDA & ARREDONDO, L.L.P.

By: /s/ Robert D. Arredondo /s/

Robert D. Arredondo

CERTIFICATE OF SERVICE

I hereby certify that the above and foregoing Brief of Appellant LG Electronics, USA, Inc. was delivered to counsel for all parties by U.S. Certified Mail Return Receipt Requested on this the 15th day of November, 2013.

MANNING, GOSDA & ARREDONDO, L.L.P.

By: /s/ Robert D. Arredondo /s/
Robert D. Arredondo