COURT OF APPEALS
EIGHTH DISTRICT OF TEXAS
EL PASO, TEXAS

YUMIN ZHAO,	§	No. 08-20-00209-CV
Appellant,	§	Appeal from
v.	§	County Court at Law No. 3
SEA ROCK INC. d/b/a ZUKI,	§	of Dallas County, Texas
Appellee.	§	(TC# CC-19-05714-C)

O P I N I O N

Appellant Yumin Zhao (Zhao) obtained a default judgment against Appellee Sea Rock Inc. d/b/a Zuki (Sea Rock) in a Dallas County justice of the peace court. Being unsatisfied with the amount of the default judgment, Zhao appealed to the county court. But when he moved to obtain another default judgment against Sea Rock in the county court, the judge determined that he had not properly served Sea Rock and dismissed his suit. Zhao appeals that dismissal claiming: (1) the court failed to provide him with adequate notice of its intention to dismiss his case before doing so; (2) the court erred in finding that service on the defendant was not perfected in the justice court; and (3) the county court discriminated against him due to his pro se status.[1] For the reasons stated, we dismiss the appeal for want of jurisdiction.[2]

[1] This appeal was originally docketed with the Fifth Court of Appeals but was transferred as a part of the Texas Supreme Court's on-going docket equalizations efforts.

[2] Sea Rock has never appeared in any of the court proceedings and has not filed a responsive brief addressing Zhao's issues in this Court.

I. BACKGROUND

A. The Justice Court Proceedings

Zhao filed a pro se petition in the justice court in 2017, alleging that Appellee Sea Rock failed to pay Zhao for modifying an outdoor sign at its restaurant. Zhao sought a total of $2,174.54 in damages from Sea Rock, which included $670 as the unpaid balance owed on the contract; $327.54 in late fees and interest; $150 in travel expenses incurred in attempting to collect the unpaid balance; and $1,000 for "mental damage[s]" resulting from the threats that Sea Rock's owner allegedly made when Zhao tried to collect on the balance.

1. The 2017 citation

In his original petition, Zhao listed "Byoung Moon" as Sea Rock's registered agent for service of process. The justice court's records indicate that the first citation issued in 2017 was signed and returned by "RA/PRES SANG LIM". That citation, however, lists the resident agent as "Byoung Moon," located at 1401 E. Arapaho Rd., Ste. F in Richardson, Texas (the address of the restaurant). The process server indicated that he served the citation at that address on Sang Lim, with a notation that Lim was the "RA, Owner, Pres." of Sea Rock.[3]

2. The 2018 citation

According to Zhao, at a subsequent hearing, the justice court informed him that he had reviewed the Secretary of State's website and believed that Byoung Moon was no longer Sea Rock's registered agent as of March 2017. The justice court therefore directed Zhao to file an amended petition listing "Edwin Moon" as the registered agent, and the person to be served at that

[3] The process server noted on the back of the 2017 citation that "the name (presumably referring to Mr. Lim) and registered agent are not the same," but that Zhao had informed him that Moon was no longer associated with the business. As well, the process server noted that the persons at the address where he served the citation did not speak English well, and he also indicated that he spoke with the wife of one of the individuals there, who became "very combative" with him, telling him that he could not "give them any paper[s]."

time. After Zhao filed his amended petition, a second citation was issued in May 2018, directed to Edwin Moon, and returned in September 2018. That citation shows that it was served at the same Arapahoe Road address and signed by "Sammy Lim," with a notation that he was the "owner, pres."

3. The entry of the default judgment

Sea Rock never filed an answer and the matter was set for trial in July 2019. When Sea Rock failed to appear, the justice court entered a default judgment in Zhao's favor. In the default judgment, the justice court recited that Sea Rock had been "duly served on September 11, 2018 and cited to appear and answer herein," but had "failed to file an answer as provided by law." The default judgment awarded Zhao damages of $670, together with prejudgment interest in the amount of $147.40.

B. The Appeal to the County Court at Law

Dissatisfied with the amount of the judgment, Zhao filed an appeal to the county court at law, posting an appeal bond in the amount of $500 to perfect his appeal, as required by the Texas Rules of Civil Procedure. *See* TEX.R.CIV.P. 506.1(a), (h) (an appeal from justice court to county court is perfected by filing a bond with the justice court within 21 days after the judgment is signed). As Zhao's appeal to county court necessitated a trial de novo, the county court at law judge set the matter for a telephonic bench trial.[4]

[4] An appeal from justice court to county court vacates the justice court's judgment, and the county court must try the matter "de novo," or in other words, the county court must hold a "new trial in which the entire case is presented as if there had been no previous trial." *See* TEX.R.CIV.P. 506.3. A trial de novo is generally defined as a new trial on the entire case, on both questions of fact and issues of law. *See Laws v. Roberson*, No. 05-20-00342-CV, 2022 WL 224358, at *1 (Tex.App.--Dallas Jan. 26, 2022, no pet.) (mem. op.).

1. The trial setting

At the trial setting, the court informed Zhao that it believed Sea Rock had not been properly served in the justice court, and that the justice court therefore lacked jurisdiction to enter a default judgment against Sea Rock. The court reasoned that this in turn deprived the county court of jurisdiction to hear Zhao's appeal. The court informed Zhao that in "looking at the Office of the Secretary of State," it believed an individual named "Moon" was the corporation's registered agent, as well as its president, in 2018. When the court said that it did not know who Sang Lim was, Zhao responded that he was a "man in the restaurant," and was the "store manager." The court responded that Mr. Lim could not accept the service as he was not the registered agent. After informing Zhao that his judgment in the justice court had been vacated when he took the appeal, the court said that it would enter a final judgment to that effect but would refund his appeal bond.

2. The dismissal order

On that same day, the court issued a "Dismissal Order" on a standardized form with a checked box reflecting that the dismissal was for "want of prosecution,"l but with a hand-written note stating: "no service on defendant." The order further stated: "The Court notes that when the Appeal was filed of the Judgment from Justice Court . . . the Justice Court's Judgment was vacated by Operation of Law." And finally, the order refunded Zhao his $500 appeal bond.

3. Zhao's motion to reinstate

Assuming that his case had in fact been dismissed for want of prosecution, Zhao timely moved to reinstate, complaining that the court failed to provide him with notice of its intent to dismiss his appeal for want of prosecution as required by Rule 165a of the Texas Rules of Civil

Procedure.[5] In his motion, Zhao also addressed whether Sea Rock had been properly served, claiming that Sea Rock had been served twice in the justice court proceedings, and that the justice court found that the second service was valid. Zhao attached numerous documents to his motion reflecting that Byoung Moon was Sea Rock's president and registered agent in 2017 and early 2018, and that Edwin Moon was the registered agent later in 2018. He did not, however, provide any documents confirming that Sang Lim or Sammy Lim had any authority to accept service on Sea Rock's behalf, or explain what their connection was to Sea Rock.

4. The hearing on the motion to reinstate

The court conducted a hearing on Zhao's motion to reinstate. At the hearing, the court informed Zhao that it could not reinstate his case because he had served "Sammy Lim" and that the court had "no idea what his relationship is to the case." The court added that it had "looked at the Secretary of State's information," and believed that "Moon" was the president and registered agent of the company in 2017 and 2018, and it did not see "where that changed." Zhao expressed some confusion over which "Moon" the court was referencing (Byoung Moon or Edwin Moon), and pointed out that Sea Rock had changed its registered agent and president at various times. However, he acknowledged that at least one of the two individuals named "Moon" was the corporation's registered agent, as well as the corporation's president, when both citations were served. At no time during the hearing did Zhao provide any information about who Sammy Lim was, or why Zhao believed he was allowed to accept service on behalf of Sea Rock.

[5] Rule 165a provides in part that: "Notice of the court's intention to dismiss and the date and place of the dismissal hearing shall be sent by the clerk to . . . each party not represented by an attorney . . ." TEX.R.CIV.P. 165a. It further provides that a party may file a motion to reinstate his case within 30 days after the dismissal. *Id*.

C. Zhao's Issues on Appeal

Following the hearing, Zhao's motion to reinstate was denied by operation of law. On appeal, Zhao raises five issues for review: (1) "Should the notice of the court's intention to dismiss and the date and place of the dismissal hearing (TRCP165a.) been given to plaintiff before it is been dismissed?"; (2) "Does the plaintiff has the rights to have an opportunity to cure the defect by necessary amendment if it's needed?"; (3) "If the JP court has made an error regarding the service, should the Appellant be harmed by the error that the court made?"; (4) "Are there double standards on citation services (TRCP106 (b) (1) for JP Courts and The County Courts?"; and (5) "Was there any discriminations against a Pro Se and minority litigators in County Courts system?"[sic].

The argument section of Zhao's brief, however, does not provide a distinct argument corresponding to each of these issues. TEX.R.APP.P. 38.1 (i) ("The brief must contain a clear and concise argument for the contentions made, with appropriate citations to authorities and to the record."); *Zaragoza v. Jessen*, 511 S.W.3d 816, 824-25 (Tex.App.--El Paso 2016, no pet.) (argument that "contains only conclusive statements with no support from any relevant case law" fails to preserve error for review). But rather than dismiss all the arguments based on briefing waiver, we address the matters that Zhao has raised with some substantive arguments, including whether the lower court erred by: (1) dismissing his case without first notifying him of its intent to do so; (2) concluding that Sea Rock was not properly served; and (3) discriminating against him due to his pro se status.

II. DISCUSSION

A. The True Basis of the Dismissal Order: Lack of Jurisdiction, Not Rule 165a

Zhao's claim that the trial court erred in failing to give him notice as required by Rule 165a is a red herring because the record shows the court dismissed the case for want of jurisdiction, and not for want of prosecution. Though the form-order contains a checked box for dismissal for "want of prosecution," the court hand wrote the notation "no service on the defendant." Moreover, the hearing transcript shows that the lower court was concerned with proper service, not diligent prosecution of the case.[6]

The lower court correctly recognized that if Zhao did not properly serve Sea Rock in the justice court, then the justice court would lack personal jurisdiction over Sea Rock and would therefore lack jurisdiction to enter a no-answer default judgment. *See Primate Constr., Inc. v. Silver*, 884 S.W.2d 151, 153 (Tex. 1994) (per curiam) (trial court lacks jurisdiction to enter a no-answer default judgment, where there is a lack of proof of proper service); TEX.R.CIV.P. 107(h) (prohibiting rendition of default judgment unless proper proof of service has been on file for ten days). This is because a trial court only acquires jurisdiction over a defendant who was duly served and failed to answer, and a court may not enter a no-answer default judgment without such proof. *See Kawasaki Steel Corp. v. Middleton*, 699 S.W.2d 199, 200 (Tex. 1985) (per curiam) (plaintiff must invoke personal jurisdiction over defendant by valid service of process); *see also*

[6] No doubt, a plaintiff's failure to take adequate steps to serve a defendant can result in a dismissal for want of prosecution. *See, e.g.*, *Brown v. Bush*, No. 02-03-00272-CV, 2004 WL 816319, at *1-2 (Tex.App.--Fort Worth 2004, pet. denied) (per curiam) (mem. op.) (affirming dismissal for want of prosecution when appellant had failed to serve defendants for the nine months the case had been on file and the trial court's dismissal notice specifically warned that trial court was considering dismissal for failure to effect service). But here, the failure to serve Sea Rock occurred in the justice court, rather than in the county court, and Zhao was not required to re-serve Sea Rock with service of process in the county court. Zhao's case was on file for less than 12 months in the county court and he duly appeared at all court hearings in both courts. There is no indication this case was dismissed on any ground other than jurisdictional lack of service.

Crown Asset Mgmt., LLC v. Dunavin, No. 05-07-01367-CV, 2009 WL 2837754, at *1 (Tex.App.--Dallas Sept. 4, 2009, no pet.) (mem. op.) ("Without proper service of citation, a trial court does not have in personam jurisdiction to enter a default judgment."). And such proof must reflect that the defendant was served with citation in "strict compliance" with the applicable rules governing service, or the attempted service will be of no effect, and a no-answer default judgment will be void. *See Spanton v. Bellah*, 612 S.W.3d 314, 316 (Tex. 2020) ("We have long held that a no-answer default judgment cannot stand when the defendant "was not served in strict compliance with applicable requirements."), *quoting Wilson v. Dunn*, 800 S.W.2d 833, 836 (Tex. 1992) (internal quotation marks omitted).

In turn, if the justice court lacked jurisdiction to enter the no-answer default judgment against Sea Rock due to a defect in the service, the county court would also lack jurisdiction to hear an appeal from that judgment. *See Villalon v. Bank One*, 176 S.W.3d 66, 69 (Tex.App.--Houston [1st Dist.] 2004, pet. denied); *see also Rice v. Pinney*, 51 S.W.3d 705, 708 (Tex.App.--Dallas 2001, no pet.) (recognizing that a county court has no jurisdiction over an appeal unless the justice court had jurisdiction). And, in that circumstance, the county court would have no alternative but to dismiss the appeal from the justice court. *See Villalon*, 176 S.W.3d at 69 (when an appeal is taken from a void judgment, the appellate court must declare the judgment void and dismiss the appeal).

B. Zhao had the Burden to Establish Proper Service

Because no-answer default judgments are disfavored in the law, Zhao had the burden to demonstrate that he strictly complied with the rules of service, as a court will not indulge any "presumptions in favor of valid issuance, service, or return of citation" when a default judgment has been entered. *See Spanton*, 612 S.W.3d at 316-17*; see also Paramount Credit, Inc. v.*

Montgomery, 420 S.W.3d 226, 230 (Tex.App.--Houston [1st Dist.] 2013, no pet.) ("In contrast to the usual rule that all presumptions will be made in support of a judgment, there are no presumptions of valid issuance, service, and return of citation when examining a default judgment."), *quoting Barker CATV Constr., Inc. v. Ampro, Inc.*, 989 S.W.2d 789, 792 (Tex.App.--Houston [1st Dist.] 1999, no pet.) (internal quotation marks omitted). And it was Zhao's responsibility to not only ensure that service on Sea Rock was proper, but to also ensure that service was properly reflected in the record. *See Primate Const., Inc.*, 884 S.W.2d at 153 (recognizing that it is the responsibility of the one requesting service, not the process server, to see that service is properly accomplished and to ensure that service is properly reflected in the record).

C. Zhao had the Opportunity to Present Evidence on the Issue of Service

Whether Zhao was given fair notice that the trial court intended to dismiss the case or not, his motion to reinstate, for which he was given a hearing, allowed him an opportunity to demonstrate that he had properly served Sea Rock.[7] The record reflects that the trial court took judicial notice of information on the Secretary of State's website without first notifying Zhao that it intended to do so. However, Zhao had a chance to rebut this information in his motion to reinstate his case. And more importantly, Zhao knew that the court was dismissing his case because it believed the wrong person was served with process, as he directly addressed that issue in his motion to reinstate and at the hearing. Thus, the hearing on the motion to reinstate cured the procedural complaints that Zhao raises over how the case was first dismissed. *See Franklin v. Sherman Indep. Sch. Dist.*, 53 S.W.3d 398, 402-03 (Tex.App.--Dallas 2001, pet. denied) (courts

[7] Because jurisdiction is fundamental, any court—including an appellate court—has the duty to determine whether it has jurisdiction to hear a matter, even if it is necessary to do so without a request from the parties. *See Freedom Communications, Inc. v. Coronado*, 372 S.W.3d 621, 623-24 (Tex. 2012) (recognizing that an appellate court must consider its jurisdiction even if that consideration is sua sponte); *Dallas County Appraisal Dist. v. Funds Recovery, Inc.*, 887 S.W.2d 465, 468 (Tex.App.--Dallas 1994, writ denied) (same).

have uniformly held that when the trial court holds a hearing on a motion to reinstate while the court had full control of its judgment, and the dismissed party thereby receives the same hearing with the same burden of proof it would have had before the order of dismissal was signed, no harmful error is shown); *Texas Mut. Ins. Co. v. Olivas*, 323 S.W.3d 266, 273 (Tex.App.--El Paso 2010, no pet.) (although due process generally requires notice before a dismissal, the opportunity to move to reinstate, with the opportunity for a hearing, cures any due process violation that may have occurred due to the lack of notice).

D. Zhao did not Meet his Burden of Establishing Service

Having concluded that Zhao was given an adequate opportunity to establish that Sea Rock was properly served in the justice court, we next address Zhao's argument that he presented sufficient evidence to support a finding that service was perfected. For the reasons below, we conclude that he did not.

1. We do not defer to the Justice Court's findings

In his brief, Zhao relies heavily on the fact the justice court approved of the service on Sea Rock and stated in its default judgment that service was proper; he therefore appears to believe that the county court was bound by the justice court's findings. An appellate court, however, is not bound by the lower court's recitals in an order granting the default judgment. *See Barker CATV Const.*, 989 S.W.2d at 792 ("Jurisdiction over the defendant must affirmatively appear by a showing of due service of citation, independent of the recitals in the default judgment."). Instead, we review the record on a de novo basis to determine, whether the record reflects that service was proper. *See Pirate Oilfield Services, Inc. v. Cunningham*, 631 S.W.3d 421, 426 (Tex.App.--Eastland 2021, no pet.) (appellate court reviews de novo the question of whether service was defective), *citing Creaven v. Creaven*, 551 S.W.3d 865, 870 (Tex.App.--Houston [14th Dist.]

2018, no pet.) (appellate court reviews question of whether citation was properly served on defendant, and whether trial court obtained personal jurisdiction to enter a default judgment as a matter of law). In Zhao's de novo appeal from the justice court, the county court fulfilled that same appellate role and was not bound by recitals in the justice court's judgment.

2. The rules for service on a corporation

To perfect service on a defendant corporation, a plaintiff may serve the corporation's registered agent, its president, or its vice-president.[8] *See Asset Prot. & Sec. Services, L.P. v. Armijo*, 570 S.W.3d 377, 383 (Tex.App.--El Paso 2019, no pet.) ("A domestic corporation authorized to transact business in Texas may be served through its president, vice president, or its registered agent"), *citing* TEX.BUS.ORGS.CODE ANN. §§ 5.201(b), 5.255(1); *see also Reed Elsevier, Inc. v. Carrollton-Farmers Branch Indep. Sch. Dist.*, 180 S.W.3d 903, 905 (Tex.App.--Dallas 2005, pet. denied). Thus, when a plaintiff attempts service on a defendant corporation, the plaintiff must ensure that the record shows that the person actually served was in fact the Corporation's registered agent or was otherwise authorized to accept service on the corporation's behalf. *See Armijo*, 570 S.W.3d at 383; *see also Pharmakinetics Labs., Inc. v. Katz*, 717 S.W.2d 704, 706 (Tex.App.--San Antonio 1986, no writ).

3. No evidence that Lim was authorized to accept service

Here, although Zhao appears to believe that service was proper because the 2018 citation reflected that it was to be served on Edwin Moon as Sea Rock's registered agent, this fact, standing

[8] A corporation in this state must designate a registered agent who has the duty to "receive or accept, and forward to the represented entity at the address most recently provided to the registered agent by the represented entity, or otherwise notify the represented entity at that address regarding, any process, notice, or demand that is served on or received by the registered agent." TEX.BUS.ORGS.CODE ANN. § 5.206 (1); *see also* TEX.BUS.ORGS.CODE ANN. § 5.201(a) (requiring each filing entity to designate and continuously maintain (1) a registered agent; and (2) a registered office to accept service of process). If the registered agent cannot be found at the registered office with reasonable diligence, the plaintiff may seek substitute service on the Secretary of State. TEX.BUS.ORGS.CODE ANN. § 5.251(1)(B); *see also* TEX.BUS.ORGS.CODE ANN. § 5.252 (explaining procedures necessary to effect substitute service on the Secretary of State). Zhao, however, did not request substitute service on the Secretary of State.

alone, does not establish valid service, as the citation was not served on Moon. Instead, it was served on another individual named Sammy Lim. The difference in name is fatal to the return of service. *See Uvalde Country Club v. Martin Linen Supply, Inc.*, 690 S.W.2d 884, 885 (Tex. 1985) (per curiam) (where citation named defendant's registered agent, but citation was delivered to a different person with no showing of his relationship to the defendant, service was invalid); *Premier Coin Galleries, Inc. v. Grinage*, No. 04-08-00863-CV, 2009 WL 1804112, at *1-2 (Tex.App.--San Antonio June 24, 2009, no pet.) (mem. op.) (where citation was properly directed at defendant corporation's registered agent, but was served on another individual, with no showing that the individual could accept service on behalf of the corporation, service was not perfected). Thus, to establish that service was valid on Sea Rock, it was incumbent on Zhao to establish that Mr. Lim could accept the citation, as either Sea Rock's president, vice-president, or registered agent. This he failed to do.

When Mr. Lim accepted the certificate of service, he told the process server that he was the "owner, pres." of Sea Rock. However, in his motion to reinstate, as well as during the hearing on that motion, Zhao admitted that either Byoung Moon or Edwin Moon was Sea Rock's president and registered agent when Mr. Lim accepted the 2018 service. And more significantly, Zhao did not provide any information to support a finding that Mr. Lim was in fact Sea Rock's president, or that he otherwise had any authority to accept the service on Sea Rock's behalf. Further, at the first hearing, Zhao acknowledged that Mr. Lim was the "store manager" at the restaurant. As the trial court correctly pointed out, this was insufficient to establish that Mr. Lim had any authority to accept the service of citation.

Accordingly, because Zhao failed to establish that Mr. Lim could accept service on Sea Rock's behalf, the justice court lacked jurisdiction over Sea Rock, and therefore could not enter

the default judgment against it. *See Uvalde Country Club*, 690 S.W.2d at 885 (default judgment could not stand where record did not show that the person served with citation was allowed to receive service on behalf of the defendant corporation); *Master Cap. Sols. Corp. v. Araujo*, 456 S.W.3d 636, 642 (Tex.App.--El Paso 2015, no pet.) (court lacked jurisdiction over defendant corporation and could not enter a default judgment, where the record did not reflect that person who was served could accept service on corporation's behalf). In turn, because the justice court had no jurisdiction to enter the default judgment, the default judgment was void, and this deprived both the county court and this Court of jurisdiction to hear Zhao's appeals from that judgment; we therefore have to dismiss Zhao's appeal. *See Bird v. Kornman*, 152 S.W.3d 154, 160 (Tex.App.--Dallas 2004, pet. denied) (when faced with a void judgment on appeal, an appellate court should declare the judgment void, and dismiss the appeal); *Villalon*, 176 S.W.3d at 69 (same); *Juarez v. Texas Ass'n of Sporting Officials El Paso Chapter*, 172 S.W.3d 274, 278 (Tex.App.--El Paso 2005, no pet.) (recognizing that if the trial court lacked jurisdiction, then an appellate court only has jurisdiction to set the judgment aside and dismiss the cause).

E. Zhao's Pro Se Status

A last theme of Zhao's appeal is that he has been treated unfairly because he prosecuted his suit pro se. But courts are required to hold pro se litigants to the same standards as licensed attorneys; they must comply with all applicable laws and rules of procedure. *See Zavala v. Franco*, 622 S.W.3d 612, 617 (Tex.App.--El Paso 2021, pet. denied); *see also Wheeler v. Green*, 157 S.W.3d 439, 444 (Tex. 2005) (recognizing that pro se litigants are not exempt from the rules of procedure). In other words, in determining whether Zhao came forward with sufficient evidence to establish that he perfected service on Sea Rock, the trial court could not take his pro se status into consideration—or his misunderstanding of the laws and rules on service—as doing

so would give him an unfair advantage over parties represented by counsel, which a court may not do. *See Robb v. Horizon Cmtys. Improvement Ass'n, Inc.*, 417 S.W.3d 585, 589-90 (Tex.App.--El Paso 2013, no pet.); *see also Mansfield State Bank v. Cohn*, 573 S.W.2d 181, 185 (Tex. 1978) (recognizing that "[l]itigants who represent themselves must comply with the applicable procedural rules, or else they would be given an unfair advantage over litigants represented by counsel."); *In re J.P.*, 365 S.W.3d 833, 837 (Tex.App.--Dallas 2012, no pet.) (same). And in turn, we must consider Zhao's arguments on appeal with this same principle in mind and treat Zhao as we would a licensed attorney.

Nor has Zhao presented any argument in support of his claim that the lower court treated him in a biased manner or, more importantly, that its decision resulted from any such bias, nor do we find that it did. *See Jonson v. Duong*, 642 S.W.3d 189, 195 (Tex.App.--El Paso 2021, no pet.) (pro se appellant's claim that trial judge should have recused herself due to bias failed, where he merely doubted judge's rulings and failed to allege any facts to support a claim of bias); *Harlan v. Dixie Pipe Line*, No. 01-96-01292-CV, 1997 WL 752317, at *5 (Tex.App.--Houston [1st Dist.] Dec. 4, 1997, pet. denied) (while judge may not have been as "compassionate" as pro se litigant may have wanted, the record did not support litigant's claim that the judge exhibited any bias against him). At best, Zhao only complains about the judge's rulings, but a litigant's dissatisfaction with a judge's rulings does not support a finding of bias. *See Jonson*, 642 S.W.3d at 195; *see also Brown v. Texas Emp. Comm'n*, 801 S.W.2d 5, 8 (Tex.App.--Houston [14th Dist.] 1990, writ denied) (pro se litigant did not establish bias where trial court granted summary judgment against her based on her failure to comply with the requirements set forth in statute governing administrative procedures).

III. CONCLUSION

For the reasons set forth above, we dismiss Zhao's appeal for want of jurisdiction.

JEFF ALLEY, Justice

June 23, 2022

Before Rodriguez, C.J., Palafox, and Alley, JJ.