

## Question

Under Texas Rule of Civil Procedure 21a, all court notices must be served through the Electronic Filing Manager (EFM), and service via email through the court coordinator is not proper.

## Answer (Texas)

### Short response

Under Texas Rule of Civil Procedure 21a(a)(1), documents filed electronically must be served through the electronic filing manager (EFM) if the email address of the party or attorney is on file with the EFM, making service via email through the court coordinator improper in such circumstances.

### Summary

Texas Rule of Civil Procedure 21a(a)(1) establishes a clear requirement that when documents are filed electronically under Rule 21, they "must be served electronically through the electronic filing manager if the email address of the party or attorney to be served is on file with the electronic filing manager." Multiple Texas appellate court decisions from 2018 through 2025 have consistently interpreted this rule to mandate service through the EFM when the recipient's email address is available in the system. This requirement was specifically designed to avoid confusion and disputes over service.

The rule creates a standardized procedure for electronic service that ensures proper notice and confirmation of receipt. When a party's or attorney's email address is registered with the EFM, bypassing this system and instead sending court notices via the court coordinator does not satisfy the requirements of Rule 21a, as recent Texas court decisions have emphasized the mandatory nature of service through the EFM. This consistent judicial interpretation supports the conclusion that service via email through the court coordinator is improper when the EFM system should be used.

## Background and Relevant Law

### Case Law Interpretation of Texas Rule of Civil Procedure 21a

Texas courts have consistently interpreted Texas Rule of Civil Procedure 21a(a)(1) as requiring electronic service through the electronic filing manager (EFM) when a party's or attorney's email address is on file with the EFM. The case law spans from 2018 to 2025, showing consistent application and interpretation of this rule.

In [De La Fuente Longoria v. Garcia](#) (Tex. App. 2025), the Texas Court of Appeals recently reiterated the rule's requirements, stating: "A document filed electronically under Rule 21 must be served electronically through the electronic filing manager if the email address of the party or attorney to be served is on file with the electronic filing manager." This clear statement directly supports the proposition that proper service requires use of the EFM when the email address is registered in the system.

Similarly, in [Galvin v. Wendel, 13-23-00469-CV \(Tex. App. Aug 29, 2024\)](#), the court elaborated on this requirement, stating that a document filed electronically under Texas Rule of Civil Procedure 21 "must be served electronically through the electronic filing manager if the email address of the party or attorney to be served is on file with the electronic filing manager." The court in Galvin further explained how electronic service is completed, noting that "Electronic service is complete on transmission of the document to the serving party's electronic filing service provider. The electronic filing manager will send confirmation of service to the serving party." This explanation highlights the procedural safeguards built into the EFM system, which would be bypassed if service occurred through email via the court coordinator.

The [Clarke v. The Frost Nat'l Bank, 08-23-00310-CV \(Tex. App. Jun 26, 2024\)](#) decision reaffirms this interpretation, stating that "A document filed electronically under Rule 21 must be served electronically through the electronic filing manager if the email address of the party or attorney to be served is on file with the electronic filing manager." This consistent language across multiple recent cases demonstrates the courts' uniform understanding of the rule's requirements.

Two different citations to [Echartea v. Flores, 691 S.W.3d 774 \(Tex. App. 2024\)](#) in the materials provide the same interpretation of Rule 21a(a)(1), noting that it "governs providing notice for documents other than citation" and that a document "must be served electronically through the electronic filing manager if the email address of the party or attorney to be served is on file with the electronic filing manager." This reinforces that the rule applies broadly to court notices and other documents that require service.

Going back to 2018, [Rouhana v. Ramirez, 556 S.W.3d 472 \(Tex. App. 2018\)](#) provides insight into the purpose behind Rule 21a(a)(1), stating that it "is designed to avoid the problems raised by the facts here." The court explained that the rule "provides that a document 'must be served electronically through the electronic filing manager if the email address of the party or attorney to be served is on file with the electronic filing manager.'" This earlier case demonstrates that the interpretation of the rule has remained consistent over time and highlights that the rule was specifically designed to prevent service-related problems.

### Purpose and Design of Rule 21a(a)(1)

The Texas Court of Appeals in [Galvin v. Wendel, 13-23-00469-CV \(Tex. App. Aug 29, 2024\)](#) explicitly addressed the purpose behind Rule 21a's requirements, noting that "The current version of Rule 21a was designed to avoid confusion and disputes over service, including disputes over whether service was sent to the correct email address." This statement provides important context for understanding why service through the EFM is mandatory when available—it creates a standardized system that reduces uncertainties and potential disputes about whether documents were properly served.

The court in [Rouhana v. Ramirez, 556 S.W.3d 472 \(Tex. App. 2018\)](#) similarly emphasized that Rule 21a(a)(1) "is designed to avoid problems" related to service. This consistent explanation across cases spanning several years demonstrates that Texas courts recognize the rule's purpose is to provide clarity and certainty in the service process.

## Analysis

### Mandatory Nature of Service Through the EFM

The language used in Texas Rule of Civil Procedure 21a(a)(1) and consistently interpreted by Texas courts is unambiguous—documents "must be served electronically through the electronic filing manager" when the email address is on file with the EFM. This use of "must" clearly establishes that service through the EFM is not optional but mandatory in such circumstances.

All six case excerpts provided in the materials use the term "must" when quoting or paraphrasing Rule 21a(a)(1), reinforcing the mandatory nature of this requirement. For example, [De La Fuente Longoria v. Garcia](#) (Tex. App. 2025) and [Clarke v. The Frost Nat'l Bank](#), 08-23-00310-CV (Tex. App. Jun 26, 2024) both specifically state that documents filed electronically "must be served electronically through the electronic filing manager" if the email address is on file.

The mandatory language used in the rule and emphasized by the courts leaves no room for alternative methods of service when the conditions for EFM service are met (i.e., when the email address is registered with the EFM). This directly supports the contention that service via email through the court coordinator would not be proper if the recipient's email address is on file with the EFM.

### Impropriety of Service Via Court Coordinator

While none of the cases explicitly addresses service through a court coordinator, the consistent interpretation of Rule 21a(a)(1) as mandating service through the EFM when applicable leads to the logical conclusion that service via email through the court coordinator would not satisfy the rule's requirements.

The [Galvin v. Wendel](#), 13-23-00469-CV (Tex. App. Aug 29, 2024) case provides particularly relevant insight when it explains that "The current version of Rule 21a was designed to avoid confusion and disputes over service, including disputes over whether service was sent to the correct email address." This statement suggests that one of the primary purposes of requiring service through the EFM is to establish a standardized, verifiable system that eliminates uncertainty about whether and when service occurred.

When service is attempted via email through a court coordinator rather than through the EFM, it circumvents this standardized system, potentially creating exactly the kind of confusion and dispute that the rule was designed to prevent. The EFM provides confirmation of service, as noted in Galvin: "Electronic service is complete on transmission of the document to the serving party's electronic filing service provider. The electronic filing manager will send confirmation of service to the serving party." Service through a court coordinator's email would lack these procedural safeguards, making it an improper alternative to the mandated EFM service.

### Consistency in Judicial Interpretation

The consistency in judicial interpretation of Rule 21a(a)(1) from 2018 through 2025 is remarkable and strengthens the conclusion that service through the EFM is mandatory when applicable. From [Rouhana v. Ramirez](#), 556 S.W.3d 472 (Tex. App. 2018) to [De La Fuente Longoria v. Garcia](#) (Tex. App. 2025), Texas courts have maintained the same understanding of the rule's requirements.

This consistent interpretation across multiple years and different courts demonstrates that the requirement for service through the EFM is well-established in Texas law. It also suggests that courts would likely find service via email through a court coordinator to be improper when the conditions for EFM service are met, as it would contradict this established interpretation.

### Procedural Safeguards and Confirmation of Service

The [Galvin v. Wendel](#), 13-23-00469-CV (Tex. App. Aug 29, 2024) case highlights an important aspect of service through the EFM—the system provides confirmation of service. The court noted that "Electronic service is complete on transmission of the document to the serving party's electronic filing service provider. The electronic filing manager will send confirmation of service to the serving party."

This confirmation feature is a significant procedural safeguard that helps ensure proper notice and creates a record of service. Service through a court coordinator's email would not provide the same level of verification and record-keeping, which further supports the conclusion that such service would be improper under Rule 21a.

### Exceptions and Caveats

#### Alternative Service Methods When Email is Not on File

It's important to note that the requirement to serve documents through the EFM applies specifically when "the email address of the party or attorney to be served is on file with the electronic filing manager." This suggests that if an email address is not on file with the EFM, alternative methods of service may be permissible.

However, the case materials provided do not specifically address what alternative service methods would be proper when an email address is not on file with the EFM. Therefore, while service via email through a court coordinator might potentially be permissible in such circumstances, the materials do not provide sufficient information to make a definitive determination on this point.

#### Documents Not Filed Electronically Under Rule 21

The requirement for service through the EFM applies specifically to documents "filed electronically under Rule 21." This suggests that documents not filed electronically might be subject to different service requirements.

[Echartea v. Flores](#), 691 S.W.3d 774 (Tex. App. 2024) notes that "Texas Rule of Civil Procedure 21a(a)(1) governs providing notice for documents other than citation." This indicates that the rule applies broadly to court notices and other documents requiring service, but it does not necessarily extend to all types of

documents in all circumstances.

Without more specific information about alternative service methods for non-electronically filed documents, it's difficult to determine whether service via email through a court coordinator might be proper in some limited circumstances. However, for electronically filed documents when the recipient's email is registered with the EFM, the requirement for service through the EFM is clear.

### Absence of Direct Case Law on Court Coordinator Service

A notable caveat to this analysis is that none of the provided case materials directly addresses the specific question of whether service via email through a court coordinator is proper or improper. The conclusion that such service is improper when the recipient's email is registered with the EFM is based on the mandatory language of Rule 21a(a)(1) as interpreted by Texas courts, rather than on cases that explicitly reject service through a court coordinator.

However, given the consistent interpretation of Rule 21a(a)(1) as requiring service through the EFM when applicable, and the stated purpose of the rule to avoid confusion and disputes over service, it is reasonable to conclude that service via email through a court coordinator would not comply with the rule's requirements when EFM service is available.

### Conclusion

Based on the consistent interpretation of Texas Rule of Civil Procedure 21a(a)(1) by Texas courts from 2018 through 2025, it is clear that documents filed electronically must be served through the electronic filing manager when the recipient's email address is on file with the EFM. This requirement is mandatory, as evidenced by the consistent use of the word "must" in the rule and in judicial interpretations.

The purpose of this requirement, as explained in cases like [Galvin v. Wendel, 13-23-00469-CV \(Tex. App. Aug 29, 2024\)](#) and [Rouhana v. Ramirez, 556 S.W.3d 472 \(Tex. App. 2018\)](#), is to avoid confusion and disputes over service by establishing a standardized system with procedural safeguards, including confirmation of service. Service via email through a court coordinator would bypass this system and its safeguards, potentially creating exactly the kind of uncertainty that the rule was designed to prevent.

While the case materials do not explicitly address service through a court coordinator, the logical conclusion from the mandatory language of Rule 21a(a)(1) and its consistent judicial interpretation is that such service would not be proper when the conditions for EFM service are met (i.e., when the recipient's email is registered with the EFM).

It's worth noting that the rule's requirements apply specifically to documents filed electronically when the recipient's email is on file with the EFM. The materials do not provide sufficient information to determine whether service through a court coordinator might be proper in other circumstances, such as when an email address is not registered with the EFM or for documents not filed electronically.

In summary, when a document is filed electronically under Texas Rule of Civil Procedure 21 and the recipient's email address is on file with the electronic filing manager, service must occur through the EFM as mandated by Rule 21a(a)(1). Service via email through the court coordinator would not satisfy this requirement and would therefore be improper in such circumstances.

### Legal Authorities

[Echartea v. Flores](#)

#### Texas Court of Appeals

##### Extract

*Texas Rule of Civil Procedure 21a(a)(1) governs providing notice for documents other than citation. The rule provides that a document 'must be served electronically through the electronic filing manager if the email address of the party or attorney to be served is on file with the electronic filing manager.'*

##### Summary

Under Texas Rule of Civil Procedure 21a(a)(1), documents must be served electronically through the electronic filing manager if the email address is on file. This supports the proposition that service via email through the court coordinator is not proper, as the rule specifies the use of the electronic filing manager for service.

[Galvin v. Wendel, 13-23-00469-CV \(Tex. App. Aug 29, 2024\)](#)

#### Texas Court of Appeals

##### Extract

*A document filed electronically under Texas Rule of Civil Procedure 21 'must be served electronically through the electronic filing manager if the email address of the party or attorney to be served is on file with the electronic filing manager.' Id. R. 21a(a)(1)... 'Electronic service is complete on transmission of the document to the serving party's electronic filing service provider. The electronic filing manager will send confirmation of service to the serving party.' Tex.R.Civ.P. 21a(b)(3)... 'The current version of Rule 21a was designed to avoid confusion and disputes over service, including disputes over whether service was sent to the correct email address.'*

##### Summary

Documents filed electronically must be served through the electronic filing manager if the email address is on file. This requirement is designed to ensure proper service and avoid disputes, indicating that service through other means, such as email via the court coordinator, would not meet the rule's requirements.

[De La Fuente Longoria v. Garcia](#)

#### Texas Court of Appeals

##### Extract

*"A document filed electronically under Rule 21 must be served electronically through the electronic filing manager if the email address of the party or attorney to be served is on file with the electronic filing manager." Id. R. 21a(a)(1).*

##### Summary

Documents filed electronically under Rule 21 must be served through the electronic filing manager if the email address is on file. This implies that service through other means, such as email through the court coordinator, would not comply with the rule if the email address is available in the electronic filing manager. The rule aims to standardize and clarify the process of electronic service to avoid confusion and disputes.

[Clarke v. The Frost Nat'l Bank, 08-23-00310-CV \(Tex. App. Jun 26, 2024\)](#)

#### Texas Court of Appeals

##### Extract

*A document filed electronically under Rule 21 must be served electronically through the electronic filing manager if the email address of the party or attorney to be served is on file with the electronic filing manager.*

##### Summary

The Texas Rule of Civil Procedure 21a mandates that documents filed electronically must be served through the electronic filing manager if the recipient's email is registered with the system. This implies that service through other means, such as email via the court coordinator, would not comply with the rule when the email is on file with the EFM.

[Rouhana v. Ramirez, 556 S.W.3d 472 \(Tex. App. 2018\)](#)

#### Texas Court of Appeals

##### Extract

*Rule 21a(a)(1) is designed to avoid the problems raised by the facts here. It provides that a document 'must be served electronically through the electronic filing manager if the email address of the party or attorney to be served is on file with the electronic filing manager.' TEX.R.CIV.P. 21a(a)(1).*

##### Summary

Rule 21a(a)(1) mandates that if an email address is on file with the electronic filing manager, service must be conducted through the EFM. This requirement is designed to ensure proper service and avoid issues related to improper service methods. The passage emphasizes the necessity of using the EFM for electronic service when an email address is available, which supports the proposition that service via email through the court coordinator is not proper if the EFM can be used.

[Echartea v. Flores, 691 S.W.3d 774 \(Tex. App. 2024\)](#)

#### Texas Court of Appeals

##### Extract

*Texas Rule of Civil Procedure 21a(a)(1) governs providing notice for documents other than citation. The rule provides that a document 'must be served electronically through the electronic filing manager if the email address of the party or attorney to be served is on file with the electronic filing manager.' Tex. R. Civ. P. 21a(a)(1).*

##### Summary

Under Texas Rule of Civil Procedure 21a(a)(1), documents must be served electronically through the electronic filing manager if the email address is on file. This supports the proposition that service via email through the court coordinator is not proper if the email address is on file with the EFM, as the rule mandates service through the EFM in such cases.

