

Texas Litigation

Our automated system encompasses all areas of litigation. We've automated more than 900 procedural forms. It contains the State Bar of Texas' Collections Manual 3rd Ed.¹, selections from the Texas Pattern Jury Charges¹, and also includes substantive pleadings. We've also included agency forms from the EEOC, TWC, and the Department of Motor Vehicles, as well as the Proof of Claim for Bankruptcy, and numerous UCC forms.

ATTORNEY CLIENT RELATIONS

FILE MANAGEMENT DOCUMENTS

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1-010	Summary of Medical Bills (Chart)
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1-012	Summary of Medical Treatment (Chart)
1-013	Summary of Settlement Negotiations

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1-104	Letter Declining Representation (Optional Release)
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1-111	Letter to Client - Relocation of Office
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GENERAL PROCEDURES & PRACTICE

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2-092	Objection to Master's Report, with Order
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 2-164 Notice of Intent to Use Unfiled Discovery
 2-165 Joint Motion for Non-suit & Voluntary Dismissal, with Order
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 2-207 Response to Motion to Equalize Jury Strikes, with Order
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2-210 Memorandum of Law (Shell)
 2-214 Motion to Take Judicial Notice, with Order
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 2-220 Motion to Permit Juror Note Taking, with Order
 2-222 Response to Motion to Permit Juror Note Taking, with Order
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 2-236 Response to Motion to Suppress Deposition, with Order
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 2-406 Objection to Motion - Judgment Non Obstante Veredicto (NOV), with Order
 2-408 Motion for Directed Verdict, with Order
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 2-432 Motion to Reform Judgment, with Order
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 2-445 Motion for Remittitur, with Order
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3-005 Affidavit - Consulting Expert
3-007 Affidavit - Trade Secret
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3-011 Affidavit - Work Product (Non-Attorney)
3-013 Withholding Statement, TRCP 193 3(a)
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3-033 Letter - Department of Public Safety (DPS) - (Requesting Crash Report)
3-034 Letter - Records Custodian - General Request
3-035 Letter - Internal Revenue Service (IRS) - Requesting Tax Information
3-036 Letter - Expert Witness - Initial Contact
3-037 Letter - Expert Witness - Preparation for Deposition or Trial Testimony
3-038 Letter - Attorney - Rule 11 Agreement, Deposition
3-039 Letter - Attorney - Rule 11 Agreement, Discovery
3-040 Letter - Videographer - Set up Deposition
3-041 Letter - Health and Human Services Commission (HHSC)- Medicaid Info
3-042 Application for Copy of Driver Record
3-043 Request for Texas Motor Vehicle Information
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3-102 Response to Requests for Production
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3-202 Response to Request for Inspection of Property
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3-301 Interrogatories (Shell)
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3-304 Response to Interrogatories
3-305 Motion to Compel Answers to Interrogatories, with Order
3-306 Post-Judgment Interrogatories to Defendant
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3-402 Response to Requests for Admissions
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3-407 Motion to Determine Sufficiency of Responses
3-408 Motion to Deem Facts Admitted, with Order
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3-411 Motion to Strike Deemed Admissions, with Order
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3-455 Notice of Oral Deposition of Non-Party Witness

3-460 Notice to Take Deposition Outside of Texas
3-465 Letter of Request, Motion for Deposition Outside of Texas
3-469 Letter Rogatory, Motion for Deposition Outside of Texas
3-472 Motion to Quash Deposition Notice (Party), with Order
3-473 Response to Motion to Quash Deposition Notice (Party), with Order
3-474 Motion to Quash Deposition Notice (Non-Party), with Order
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3-500 Notice of Deposition - Non-stenographic (Party)
3-501 Notice of Deposition - Non-stenographic (Non-Party)
3-502 Notice of Intention to Take Written Deposition
3-503 Motion to Shorten Time for Video Deposition, with Order
3-504 Motion for Telephone Deposition, with Order
3-505 Cross Questions For Written Deposition
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3-507 Motion to Compel Answers to Deposition Questions, with Order
3-508 Motion for Contempt - Failure to attend deposition
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3-510 Response to Motion to Compel (Deposition Question), with Order
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3-635 Motion to Modify Discovery Procedures, with Order
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3-641 Response to Motion to Extend Time to Respond to Discovery, with Order
3-701 Motion for Level 3 Discovery Control Plan
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3-718 Motion for Protective Order, with Order
3-719 Response to Motion for Protective Order
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3-731 Notice of Filing of Business Records

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4-010 Defendant's Original Answer (Counterclaim, Defenses, etc)
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MOTOR VEHICLE ACCIDENT**CORRESPONDENCE - MOTOR VEHICLE ACCIDENT**

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 5-002 Demand for Personal Injury Protection (PIP) Forms
 5-003 Demand Letter - Uninsured Motorist
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 5-035 Demand - Stowers
 5-040 Letter Denying Subrogation Entitlement
 5-045 Letter - Department of Public Safety (DPS)-Request Forms SR 42 & SR 62

DISCOVERY - MOTOR VEHICLE ACCIDENT

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 5-075 Interrogatories - Motor Vehicle Accident
 5-080 Request for Admissions - Motor Vehicle Accident

LITIGATION - MOTOR VEHICLE ACCIDENT

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MEDICAL MALPRACTICE**CORRESPONDENCE - MEDICAL MALPRACTICE**

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 6-017 Authorization for Release of Medical Records - Medical Malpractice

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 6-052 Letter - Provider - Letter of Protection
 6-053 Letter - Emergency Medical Service (EMS) - Records & Bills Request
 6-054 Letter - Hospital - Billing Records Request
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LITIGATION - MEDICAL MALPRACTICE

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 6-087 Cost Bond - Health Care Liability Claim
 6-088 Certificate of Escrow Deposit - Health Care Liability Claim
 6-090 Motion to Extend Expert Report Submission Date, with Order
 6-093 Motion to Exclude Expert Witness (Daubert), with Order (Med Mal)
 6-095 Response to Motion to Exclude Expert (Daubert), with Order (Med Mal)
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PREMISES LIABILITY**CORRESPONDENCE - PREMISES LIABILITY**

7-005 Notice Letter to Property Owner

DISCOVERY - PREMISES LIABILITY

7-070 Request for Production - Premises Liability
 7-075 Interrogatories - Premises Liability
 7-080 Request for Admissions - Premises Liability

LITIGATION - PREMISES LIABILITY

7-085 Petition - Premises Liability

PRODUCTS LIABILITY**CORRESPONDENCE - PRODUCTS LIABILITY**

8-005 Letter to Manufacturer Concerning Representation

DISCOVERY - PRODUCTS LIABILITY

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 8-075 Interrogatories - Products Liability
 8-080 Request for Admissions - Products Liability

LITIGATION - PRODUCTS LIABILITY

8-085 Petition - Products Liability

EMPLOYMENT**ATTORNEY-CLIENT RELATIONS**

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 9-003 Memo - Consultation
 9-004 Letter - Explanation of Administrative Process
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 9-007 Letter, Cover - Client Worksheets
 9-008 Worksheet - Loss of Future Earnings
 9-009 Worksheet - Damages Assessment
 9-010 Worksheet - Employment Record
 9-011 Letter - Request Witness List, Chronology, or Document List
 9-012 Letter - Request Review of Witness List

CORRESPONDENCE - EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

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 9-102 Letter - EEOC - Representation
 9-103 Letter - Request for Right To Sue
 9-104 Letter - Request for EEOC Investigative File
 9-105 Letter - Appeal of EEOC's Denial of File Request
 9-106 Letter - Request to Re-Open Investigation
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 9-109 Memo - EEOC - Suggested Charge Language

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 9-202 Letter - TWC - Civ Rights Div - Representation
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 9-204 Form - TWC - Civ Rights Div - Intake
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 9-206 Letter - Request for Right to File Civil Action
 9-207 Letter -TWC - Civ Rights Div - Withdrawal of Counsel

TEXAS WORKFORCE COMMISSION

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 9-302 Proposed Questions for Examination of Employer
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 9-304 Letter - TWC - Evidence for Appeal Tribunal Hearing
 9-305 Request for Witness Subpoena
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 9-307 Petition for Trial De Novo

DEMAND LETTERS - EMPLOYMENT

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 9-402 Demand Letter - Age
 9-403 Demand Letter - Breach of Employment Contract
 9-404 Demand Letter - Fair Labor Standards Act
 9-405 Demand Letter - Family Medical Leave Act
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 9-407 Demand Letter - Retaliation
 9-408 Demand Letter - Religion
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 9-410 Demand Letter - Sexual Harassment
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 9-414 Demand Letter - Multiple Causes of Action

DISCOVERY - EMPLOYMENT

9-501 Interrogatories - Employer
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SETTLEMENT DOCUMENTS

9-601 Letter - Proposed Settlement

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9-602 Tolling Agreement Regarding Settlement Negotiations

LITIGATION - STATE

9-701 Petition - State - Disability
 9-702 Petition - State - Age
 9-706 Petition - State - Race, Color or National Origin
 9-707 Petition - State - Retaliation
 9-708 Petition - State - Religion
 9-709 Petition - State - Sex Discrimination
 9-710 Petition - State - Sexual Harassment
 9-713 Petition - State - Multiple Causes of Action

LITIGATION - FEDERAL

9-801 Petition (Complaint) - Federal - Americans with Disabilities Act (ADA)
 9-802 Petition (Complaint) - Federal - Age
 9-805 Petition (Complaint) - Federal - Family Medical Leave Act
 9-806 Petition (Complaint) - Federal - Race, Color or National Origin
 9-808 Petition (Complaint) - Federal - Religion
 9-809 Petition (Complaint) - Federal - Sex Discrimination
 9-810 Petition (Complaint) - Federal - Sexual Harassment
 9-813 Petition (Complaint) - Federal - Multiple Causes of Action
 9-816 Notice - Federal - Removal
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DECEPTIVE TRADE PRACTICES ACT (DTPA)

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 14-025 Response to Notice of Claim - Reject Claim or Offer Settlement

PLEADINGS - DTPA

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 14-055 Defendant's Original Answer
 14-060 Affidavit Certifying Rejection of Settlement Offer
 14-065 Plea in Abatement
 14-070 Response to Plea in Abatement (with Controverting Affidavit)
 14-075 Motion to Compel Mediation
 14-080 Original Answer of Consumer Defendant to Collection Suit

DISCOVERY - DTPA

14-100 Interrogatories (from DTPA claimant)
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PRACTICE

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 24-0103 Client's Authorization for Attorney to Receive Payments
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FINDING DEBTOR'S ASSETS

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COMMUNICATING WITH DEBTOR

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24-0402 Demand Letter - Consumer Debt
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 24-0502 Letter Requiring Debtor to Assemble Collateral at Convenient Location
 24-0503 Letter to Debtor Giving Notice of Default and Intent to Accelerate
 24-0504 Letter to Debtor Giving Notice of Acceleration
 24-0505 Notification of Disposition of Collateral
 24-0506 Notice of Our Plan to Sell Property
 24-0507 Newspaper Notice of Public Sale
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 24-0509 Letter to Debtor Giving Notice of Intent to Retain Collateral
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 24-0702 Petition & Application to Foreclose Constitutional Lien - Personality
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 24-0704 Affidavit to Fix Worker's Lien
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 24-0707 Notice of Sale - Worker's Possessory Lien (Vehicle, Boat, Vessel)
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 24-0710 Petition & Application to Foreclose Landlord's Lien
 24-0711 Affidavit & Lien Statement - Commercial Building Landlord's Lien
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 24-0713 Affidavit for Distress Warrant
 24-0714 Order for Issuance of Distress Warrant
 24-0715 Distress Warrant to be Served on Defendant
 24-0716 Officer's Return for Distress Warrant
 24-0717 Application - Emergency Sale of Perishable Property (Distress Warrant)
 24-0718 Affidavit - Emergency Sale of Perishable Property (Distress Warrant)
 24-0719 Order - Emergency Sale of Perishable Property (Distress Warrant)
 24-0720 Notice to Owner of Filing of Lien Affidavit
 24-0721 Notice of Claim to Owner and Original Contractor
 24-0722 Notice to Owner Regarding Liens Against Homestead Property
 24-0723 Contractor's Disclosure Statement for Residential Construction
 24-0724 Contractor's List of Subcontractors and Suppliers
 24-0725 Notice to Original Contractor by Second-Tier Claimant
 24-0726 Notice Regarding Specially Fabricated Materials
 24-0727 Notice of Agreement Providing for Retainage
 24-0728 Affidavit Claiming Mechanic's and Materialman's Lien
 24-0729 Cover Letter Sending Copy of Lien Affidavit
 24-0730 Request for Information to Owner
 24-0731 Request for Information to Original Contractor
 24-0732 Request for Information to Subcontractor
 24-0733 Contractor's Disbursement Disclosure for Residential Construction
 24-0734 Bills Paid Affidavit
 24-0735 Application for Prejudgment Writ of Garnishment
 24-0736 Affidavit for Prejudgment Writ of Garnishment
 24-0737 Order for Issuance of Prejudgment Writ of Garnishment
 24-0738 Writ of Garnishment to be Served on Garnishee
 24-0739 Officer's Return for Prejudgment Writ of Garnishment
 24-0740 Notice of Garnishment
 24-0741 Application & Affidavit for Writ of Sequestration
 24-0742 Order for Issuance of Writ of Sequestration
 24-0743 Writ of Sequestration
 24-0744 Notice of Sequestration
 24-0745 Officer's Return for Writ of Sequestration
 24-0746 Plaintiff's Replevy Bond for Sequestered Property
 24-0747 Application - Emergency Sale - Perishable Property (Sequestration)
 24-0748 Affidavit for Emergency Sale of Perishable Property (after Sequestration)
 24-0749 Order for Emergency Sale of Perishable Property (after Sequestration)

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24-0750	Application for Writ of Attachment
24-0751	Affidavit for Writ of Attachment
24-0752	Order for Issuance of Writ of Attachment
24-0753	Writ of Attachment
24-0754	Notice of Attachment
24-0755	Officer's Return for Writ of Attachment
24-0756	Application for Emergency Sale of Attached Property (after Attachment)
24-0757	Affidavit for Emergency Sale of Attached Property (after Attachment)
24-0758	Order for Emergency Sale of Attached Property (after Attachment)
24-0759	Application & Affidavit - TRO & Temporary Injunction
24-0760	Order for Issuance of TRO & Temporary Injunction
24-0761	Temporary Restraining Order
24-0762	Order for Issuance of Temporary Injunction
24-0763	Temporary Injunction
24-0764	Bond to Defendant for Injunction

CAUSES OF ACTION AND SERVICE OF PROCESS

24-0901	Petition for Suit on Sworn Account
24-0902	Verification for Suit on Sworn Account
24-0903	Petition for Suit on Note
24-0904	Petition for Deficiency Judgment
24-0905	Petition for Suit on Lease of Personal Property
24-0906	Petition for Suit on Revolving Credit Account
24-0907	Petition for Suit on Retail Installment Contract
24-0908	Affidavit (and Proof of Mailing) - Filing of Foreign Judgment
24-0909	Petition for Suit on Foreign Judgment
24-0910	Petition for Suit on Guaranty
24-0911	Petition for Suit on Oral Debt
24-0912	Petition for Suit on Written Contract
24-0913	Petition for Fraudulent Transfer Action
24-0914	Motion for Substituted Service
24-0915	Affidavit in Support of Motion for Substituted Service
24-0916	Order for Substituted Service
24-0917	Letter to Clerk Transmitting Motion for Substituted Service
24-0918	Letter Transmitting Citation for Service on Secretary of State
24-0919	Letter to Secretary of State
24-0920	Affidavit for Citation by Publication
24-0921	Letter to Clerk Requesting Issuance of Citation by Publication
24-0922	Letter to Officer Transmitting Citation to be Served by Publication
24-0923	Letter Requesting Clerk to Issue and Serve Citation by Publication
24-0924	Motion for Appointment of Attorney Ad Litem
24-0925	Order Appointing Attorney Ad Litem
24-0926	Order for Discharge and Compensation of Attorney Ad Litem

DISCOVERY

24-1101	Notice of Intention to Take Oral Deposition [with Subpoena Duces Tecum]
24-1102	Subpoena [with Duces Tecum Language]
24-1103	Notice of Intention to Take Deposition on Written Questions [Duces Tecum]
24-1105	Plaintiff's Requests for Disclosure
24-1106	Plaintiff's Request for Admissions - Collections
24-1113	Plaintiff's Written Interrogatories - Collections
24-1120	Plaintiff's Motion to Enlarge Number of Written Interrogatories
24-1121	Order Enlarging Number of Interrogatories
24-1122	Plaintiff's Request for Production of Documents and Tangible Things
24-1123	Plaintiff's Motion to Compel Discovery
24-1124	Order Compelling Discovery
24-1125	Plaintiff's Motion for Sanctions
24-1126	Order Imposing Sanctions

PRE-TRIAL AND TRIAL PROCEDURE

24-1201	Business Records Affidavit - Collections
24-1202	Notice to Other Party of Filing of Business Records Affidavit
24-1203	Affidavit Concerning Cost and Necessity of Services
24-1204	Plaintiff's Response to Motion to Transfer Venue
24-1205	Affidavit Opposing Transfer
24-1206	Order Overruling Motion to Transfer Venue
24-1207	Motion to Take Judicial Notice of Law of Another State
24-1208	Order Taking Judicial Notice of Law of Another State

24-1209	Plaintiff's Motion for Summary Judgment
24-1216	Plaintiff's Summary Judgment Affidavit for Suit on Sworn Account
24-1217	Plaintiff's Summary Judgment Affidavit for Suit on Promissory Note
24-1218	Plaintiff's Summary Judgment Affidavit for Attorney's Fees

JUDGMENT

24-1301	Motion for Entry of Default Judgment - Collections
24-1302	Certificate of Last Known Mailing Address - Collections
24-1303	Non-military Affidavit - Collections
24-1304	Default Judgment
24-1305	Judgment Nihil Dicit
24-1306	Final Summary Judgment
24-1307	Partial Summary Judgment
24-1308	Final Judgment (after trial of some issues)
24-1309	Agreed Judgment
24-1310	Judgment on Foreign Judgment
24-1311	Judgment Based on Trial to the Court
24-1312	Judgment Based on Jury Verdict
24-1313	Judgment Based on Directed Verdict

POST-JUDGMENT PROCEDURE AND REMEDIES

24-1401	Abstract of Judgment
24-1402	Letter to Client Explaining Judgment Lien
24-1403	Release of Judgment Lien
24-1404	Letter to Client Reporting That Judgment Cannot Be Collected
24-1405	Letter to Clerk Requesting Writ of Execution or Order of Sale
24-1406	Affidavit for Immediate Issuance of Writ of Execution
24-1407	Letter to Officer Transmitting Writ of Execution or Order of Sale
24-1408	Application for Writ of Garnishment after Judgment
24-1409	Affidavit for Writ of Garnishment after Judgment
24-1410	Notice of Garnishment (Post-judgment)
24-1411	Judgment in Garnishment
24-1412	Officer's Return for Post-judgment Writ of Garnishment
24-1413	Application for Turnover Relief
24-1414	Order for Turnover Relief
24-1415	Application for Charging Order
24-1416	Charging Order
24-1417	Venditioni Exponas
24-1418	Assignment of Judgment and Judgment Lien
24-1419	Plaintiff's Original Petition to Revive Judgment
24-1420	Judgment Reviving Dormant Judgment

POST-JUDGMENT DISCOVERY

24-1501	Notice of Intention to Take Oral Deposition in Aid of Judgment (Short form)
24-1502	Notice of Intention to Take Oral Deposition in Aid of Judgment (Long form)
24-1503	Subpoena Duces Tecum (Nonparty witness, Post-judgment deposition)
24-1504	Plaintiff's Interrogatories in Aid of Judgment
24-1509	Motion to Compel Answers to Interrogatories in Aid of Judgment
24-1510	Order Compelling Answers to Interrogatories in Aid of Judgment
24-1511	Transmittal Letter to Respondent Following Hearing on Motion to Compel
24-1512	Motion to Hold Respondent in Contempt and for Show-Cause Order
24-1513	Show-Cause Notice
24-1514	Letter to Officer for Show-Cause Notice, Order, & Motion for Service
24-1515	Contempt Judgment
24-1516	Writ of Attachment and Commitment Order
24-1517	Order for Writ of Attachment
24-1518	Writ of Attachment (Post-judgment)

PROBATE AND GUARDIANSHIP

24-1601	Suggestion of Death and Scire Facias
24-1602	Authenticated Claim of Creditor
24-1603	Petition for Suit Against Dependent Personal Representative or Guardian
24-1604	Petition for Suit Against Independent Executor or Administrator
24-1605	Application for Sale of Collateralized Property
24-1606	Order Authorizing Sale of Collateralized Property
24-1607	Application for Foreclosure Sale of Mortgaged Property
24-1608	Order Authorizing Sale of Mortgaged Property
24-1609	Report of Sale of Personal or Real Property

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24-1610 Decree Confirming Sale

BANKRUPTCY

24-1701 Proof of Claim

PATTERN JURY CHARGES

MISCELLANEOUS PATTERN JURY DOCUMENTS

25-002 Request for Questions, Instructions, and Definitions - NOT SBOT
25-004 Shell Charge - NOT SBOT

ADMONITORY INSTRUCTIONS

PJC1.1 Instructions to Jury Panel Before Voir Dire
PJC1.2 Instructions to Jury After Selection
PJC1.3 Charge of the Court
PJC1.4 Additional Instruction for Bifurcated Trial
PJC1.5 Instructions to Jury After Verdict
PJC1.6 Instructions to Jury if Permitted to Separate
PJC1.7 Instruction if Jury Disagrees About Testimony
PJC1.8 Circumstantial Evidence (Optional)
PJC1.9 Instructions to Deadlocked Jury
PJC1.10 Privilege - No Adverse Inference

BASIC DEFINITIONS IN NEGLIGENCE ACTIONS

PJC2.1 Negligence and Ordinary Care - Basic Negligence
PJC2.2 High Degree of Care - Basic Negligence
PJC2.3 Child's Degree of Care - Basic Negligence
PJC2.4 Proximate Cause - Basic Negligence

INFERENTIAL REBUTTAL INSTRUCTIONS

PJC3.1 New And Independent Cause - Basic Negligence
PJC3.2 Sole Proximate Cause - Basic Negligence
PJC3.3 Emergency - Basic Negligence
PJC3.4 Unavoidable Accident - Basic Negligence
PJC3.5 Act of God - Basic Negligence

BASIC NEGLIGENCE QUESTIONS

PJC4.1 Question Submission - Negligence & Proximate Cause, Basic Negligence
PJC4.2 Question - Standards of Recovery for Exemplary Damages
PJC4.3 Question - Proportionate Responsibility, Basic Negligence
PJC4.4 Question - Proportionate Responsibility If Contribution Defendant

NEGLIGENCE PER SE

PJC5.1 Question - Negligence Per Se and Common Law Negligence
PJC5.2 Question - Negligence Per Se and Common Law Negligence - Excuse
PJC5.3 Question - Negligence Per Se - Simple Standard - Broad Form
PJC5.4 Question - Negligence Per Se - Complex Standard
PJC5.5 Question - Statutory Dramshop Liability
PJC5.6 Question - Defense to Respondeat Superior Under Dramshop

INTENTIONAL PERSONAL TORTS

PJC6.1 Question - False Imprisonment
PJC6.2 False Imprisonment - Unlawful Detention by Threat
PJC6.3 False Imprisonment - Defense of Privilege, Prevent Theft
PJC6.4 Question - Malicious Prosecution
PJC6.5 Question - Intentional Infliction of Emotional Distress
PJC6.6 Question - Assault and Battery

AGENCY AND SPECIAL RELATIONSHIPS

PJC7.1 Question - Employee
PJC7.2 Question - Borrowed Employee - Liability of Borrowing Employer
PJC7.3 Question - Borrowed Employee - Lending Employer's Rebuttal Instruction
PJC7.4 Question - Borrowed Employee - Disjunctive Submission of Liability
PJC7.5 Question - Employment as Defense Under Worker's Compensation Act
PJC7.6 Question - Scope of Employment
PJC7.7 Deviation
PJC7.8 Independent Contractor
PJC7.9 Independent Contractor by Written Agreement
PJC7.10 Question - Respondeat Superior - Nonemployee
PJC7.11 Question - Joint Enterprise
PJC7.12 Question - Negligent Entrustment - Driver

PJC7.13 Question - Negligent Entrustment - Defective Vehicle
PJC7.14 Question - Imputing Gross Negligence or Malice to a Corporation
PJC7.15 Question - Vice - Principal of a Corporation

PERSONAL INJURY DAMAGES

PJC8.1 Instruction Conditioning Damages Questions on Liability - Personal Injury
PJC8.1.5 Instruction - Personal Injury Damages - Income Taxes - Personal Injury
PJC8.2 Question - Personal Injury Damages - Personal Injury
PJC8.3 Question - Injury of Spouse - Personal Injury
PJC8.4 Question - Injury of Minor Child - Personal Injury
PJC8.5 Question - Parents' Loss of Services of Minor Child - Personal Injury
PJC8.6 Question - Exemplary Damages - Personal Injury
PJC8.7 Exclusionary Instruction for Other Condition - Personal Injury
PJC8.8 Instruction - Preexisting Condition That Is Aggravated - Personal Injury
PJC8.9 Exclusionary Instruction for Failure to Mitigate - Personal Injury
PJC8.10 Question - Child's Loss of Consortium - Parent's Injury - Personal Injury
PJC8.11 Question - Child's Loss of Consortium - Damages - Personal Injury

WRONGFUL DEATH DAMAGES

PJC9.1 Instruction Conditioning Damages Question on Liability - Wrongful Death
PJC9.1.5 Instruction on Damages Subject to Income Taxes - Wrongful Death
PJC9.2 Question - Claim of Surviving Spouse - Wrongful Death
PJC9.3 Question - Claim of Surviving Child - Wrongful Death
PJC9.4 Question - Claim of Surviving Parents of Minor Child - Wrongful Death
PJC9.5 Question - Claim of Surviving Parents of Adult Child - Wrongful Death
PJC9.6 Question - Exemplary Damages - Wrongful Death
PJC9.7 Question - Apportionment of Exemplary Damages - Wrongful Death

SURVIVAL DAMAGES

PJC10.1 Instruction Conditioning Damages Questions on Liability - Survival
PJC10.1.5 Instruction on Damages Subject to Income Tax - Survival Damages
PJC10.2 Question - Compensatory Damages - Survival
PJC10.3 Question - Exemplary Damages - Survival

PROPERTY DAMAGES

PJC11.1 Instruction Conditioning Damages Questions on Liability - Property
PJC11.1.5 Instruction on Damages Subject to Income Tax - Property Damages
PJC11.2 Question - Market Value Before and After Occurrence
PJC11.3 Question - Cost of Repairs and Loss of Use of Vehicle - Property

MEDICAL MALPRACTICE - ADMONITORY INSTRUCTIONS

PJC40.1 Instructions to Jury Panel Before Voir Dire - Medical Malpractice
PJC40.2 Instructions to Jury after Jury Selection
PJC40.3 Charge of the Court - Medical Malpractice
PJC40.4 Additional Instruction for Bifurcated Trial - Medical Malpractice
PJC40.5 Instructions to Jury After Verdict - Medical Malpractice
PJC40.6 Instruction to Jury If Permitted to Separate - Medical Malpractice
PJC40.7 Instruction If Jury Disagrees about Testimony - Medical Malpractice
PJC40.8 Circumstantial Evidence (Optional) - Medical Malpractice
PJC40.9 Instructions to Deadlocked Jury - Malpractice
PJC40.10 Privilege - No Adverse Inference - Medical Malpractice

MEDICAL MALPRACTICE - DEFINITIONS, INSTRUCTIONS, PRELIMINARY QUESTIONS

PJC50.1 Physician's Degree of Care; Proximate Cause - Medical Malpractice
PJC50.2 Hospital's Degree of Care; Proximate Cause - Medical Malpractice
PJC50.3 Health Care Personnel Degree of Care; Proximate Cause - Med Malpractice
PJC50.4 New and Independent Cause - Medical Malpractice
PJC50.5 Sole Proximate Cause - Medical Malpractice
PJC50.6 Physician - Patient Relationship - Medical Malpractice
PJC50.7 Evidence of Bad Result

MEDICAL MALPRACTICE - THEORIES OF DIRECT LIABILITY

PJC51.3 Question - Negligence of Physician, Hospital, or Other Provider - Med Mal
PJC51.4 Question - Proportionate Responsibility - Medical Malpractice
PJC51.5 Question - Proportionate Responsibility - Joinder of Contribution Defendant
PJC51.6 Question - Proportionate Responsibility, Derivative Claimant - Med Mal
PJC51.7 Question - Abandonment of Patient by Physician - Medical Malpractice
PJC51.9 Question - Informed Consent, Common Law - Medical Malpractice
PJC51.10 Question - Informed Consent (Statutory) - Procedure not on list A or B

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- PJC51.11 Question - Informed Consent (Statutory) - List A Procedure - No Disclosure
 PJC51.12 Question - Informed Consent - List A Procedure - Not Statutory Form
 PJC51.13 Question - Informed Consent (Statutory) - List A - Reason for No Disclosure
 PJC51.14 Question - Informed Consent - List A - Issue on Validity of Disclosure
 PJC51.15 Question - Battery - Medical Malpractice
 PJC51.16 Question - Express Warranty - Medical Malpractice
 PJC51.18a Question - Emergency Care (Statutory) - Outside hospital or other facility
 PJC51.18b Question - Emergency Care (Statutory) - Inside hospital or other facility
 PJC51.18c Question - Emergency Care (Statutory) - Care after Treatment Emergency Room
 PJC51.19 Question - Malicious Credentialing Claim against a Hospital

MEDICAL MALPRACTICE - THEORIES OF VICARIOUS LIABILITY

- PJC52.1 Borrowed Employee - Medical - Liability for Borrowing Employer
 PJC52.2 Borrowed Employee - Medical - Lending Employer's Rebuttal Instruction
 PJC52.3 Employee - Disjunctive Submission - Lending or Borrowing Employer
 PJC52.4 Ostensible Agency - Question and Instruction

NON-MEDICAL MALPRACTICE - DEFINITIONS AND INSTRUCTIONS

- PJC60.1 Non-medical Professional's Degree of Care; Proximate Cause
 PJC60.2 New and Independent Cause - Non-medical Professional
 PJC60.3 Sole Proximate Cause - Non-medical Professional

NON-MEDICAL PROFESSIONAL MALPRACTICE - THEORIES OF RECOVERY

- PJC61.3 Question - Non-medical Professional Relationship - Existence in Dispute
 PJC61.4 Question - Negligent Misrepresentation - Non-medical
 PJC61.5 Question - Negligence of Non-medical Professional
 PJC61.6 Question - Proportionate Responsibility - Non-medical Professional
 PJC61.7 Question - Proportionate Responsibility - Contribution Defendant Joinder
 PJC61.8 Question - Proportionate Responsibility - Derivative Claim - Non-medical

PREMISES LIABILITY - DEFINITIONS AND INSTRUCTIONS

- PJC65.2 Negligence and Ordinary Care Other Than Owners or Occupiers - Premises Liab
 PJC65.3 Child's Degree of Care - Premises Liability
 PJC65.4 Proximate Cause - Premises Liability
 PJC65.5 New and Independent Cause - Premises Liability
 PJC65.6 Sole Proximate Cause - Premises
 PJC65.7 Unavoidable Accident
 PJC65.8 Act of God
 PJC65.9 Emergency - Premises Liability

PREMISES LIABILITY - THEORIES OF RECOVERY

- PJC66.3 Question - Negligent Activity or Defect - Right to Control - Premises Liab
 PJC66.4 Question - Plaintiff is Invitee - Premises Liability
 PJC66.5 Question - Plaintiff is Licensee - Premises Liability
 PJC66.6 Question - Plaintiff's Status in Dispute - Premises Liability
 PJC66.7 Question- Disjunctive Submission of Invitee-Licensee for Alternate Theories
 PJC66.8 Question - Plaintiff-Licensee Injured by Gross Negligence - Prem Liability
 PJC66.9 Question - Plaintiff is Trespasser - Premises Liability
 PJC66.10 Question - Attractive Nuisance - Premises Liability
 PJC66.11 Question - Proportionate Responsibility - Premises Liability
 PJC66.12 Question - Proportionate - Joinder of Contribution Defendant - Premises
 PJC66.13 Question - Proportionate Responsibility - Derivative Claimant - Premises
 PJC66.14 Question - Property Owner's Liability to Contractors, Subcontractors

PRODUCTS LIABILITY - DEFINITIONS, INSTRUCTIONS, PRELIMINARY QUESTIONS

- PJC70.1 Producing Cause - Products Liability
 PJC70.2 Proximate Cause - Products Liability
 PJC70.3 New and Independent Cause - Products Liability
 PJC70.4 Sole Cause - Products Liability
 PJC70.5 Question - Seller of a Product - Products Liability
 PJC70.6 Substantial Change in Condition or Alteration by Affirmative Conduct

PRODUCTS LIABILITY - THEORIES OF RECOVERY

- PJC71.3 Question - Manufacturing Defect or Impure Product - Products Liability
 PJC71.4 Question - Design Defect - Products Liability
 PJC71.5 Question - Marketing Defect - No or Inadequate Warning or Instruction
 PJC71.6 Question - Misrepresentation (Section 402B) - Products Liability
 PJC71.7 Question - Negligent Undertaking
 PJC71.8 Question - Breach of Implied Warranty of Merchantability UCC 2 314(b)(3)
 PJC71.9 Question - Breach Implied Merchantability Warranty UCC 2 314(b)(1-2)(4-6)

- PJC71.10 Question - Breach Implied Warranty-Particular Purpose Fitness UCC 2 315
 PJC71.11 Question - Breach of Express Warranty (UCC 2 313)
 PJC71.12 Question - Proportionate Responsibility - Products Liability
 PJC71.13 Question - Proportionate Responsibility Joinder of Defendant - Products
 PJC71.14 Question - Proportionate Responsibility - Derivative Claimant - Products

DAMAGES - MALPRACTICE, PREMISES PRODUCTS LIABILITY

- PJC80.1 Instruction Conditioning Damages on Liability - Personal Injury
 PJC80.2 Instruction - Personal Injury Damages - Income Taxes
 PJC80.3 Question - Personal Injury Damages
 PJC80.4 Question - Injury of Spouse - Personal Injury - Malpractice, Premises, Products
 PJC80.5 Question - Injury of Minor Child - Personal Injury - Malpractice, Premise, Prod
 PJC80.6 Question - Parents' Loss of Services of Minor Child
 PJC80.7 Exclusionary Instruction for Other Condition
 PJC80.8 Instruction - Preexisting Condition That Is Aggravated
 PJC80.9 Exclusionary Instruction for Failure to Mitigate
 PJC80.10 Question - Percentage Question Concerning Failure to Mitigate
 PJC80.11 Instruction Concerning Damages Limit in Health Care Suit
 PJC80.12 Question - Child's Loss of Consortium - Parent's Injury
 PJC80.13 Question - Child's Loss of Consortium - Damages

WRONGFUL DEATH DAMAGES - MALPRACTICE, PREMISES, PRODUCTS

- PJC81.1 Instruction Conditioning Damages on Liability - Wrongful Death
 PJC81.2 Instruction on Damages Subject to Taxes - Wrongful Death
 PJC81.3 Question - Claim of Surviving Spouse - Wrongful Death - Malpractice, Premises, Product
 PJC81.4 Question - Claim of Surviving Child - Wrongful Death - Malpractice, Premises, Product
 PJC81.5 Question - Claim of Parents of Minor Child - Wrongful Death
 PJC81.6 Question - Claim of Parents of Adult Child - Wrongful Death
 PJC81.7 Instruction Concerning Damages Limit in Health Care Suit - Wrongful Death

SURVIVAL DAMAGES - MALPRACTICE, PREMISES, PRODUCTS

- PJC82.1 Instruction Conditioning Damages on Liability - Survival
 PJC82.2 Instruction on Damages Subject to Income Tax - Survival
 PJC82.3 Question - Compensatory Damages - Survival - Malpractice, Premises, Products
 PJC82.4 Instruction Concerning Damages in Health Care Suit - Survival

PROPERTY DAMAGES - MALPRACTICE, PREMISES, PRODUCTS

- PJC83.1 Instruction Conditioning Damages on Liability - Property
 PJC83.2 Instruction on Damages Subject to Tax - Property Damages
 PJC83.3 Question - Market Value Before and After Occurrence - Malpractice, Premises, Product
 PJC83.4 Question - Cost of Repairs and Loss of Use - Property

ECONOMIC DAMAGES - MALPRACTICE, PREMISES, PRODUCTS

- PJC84.1 Instruction Conditioning Damage on Liability - Economic
 PJC84.2 Instruction on Damages Subject to Tax - Economic Damages
 PJC84.3 Non-medical Professional Malpractice Economic Damages
 PJC84.4 Question and Instruction on Monetary Loss Caused by Neg Misrepresentation

EXEMPLARY DAMAGES - MALPRACTICE, PREMISES, PRODUCTS

- PJC85.1 Standards for Recovery of Exemplary Damages
 PJC85.2 Question - Imputing Gross Neg or Malice to a Corporation - Mal, Prem, Prod
 PJC85.3 Question - Determining Amount of Exemplary Damages
 PJC85.4 Question - Apportioning Exemplary Damages
 PJC85.5 Question and Instruction - Forgery as a Ground for Removing Limitation
 PJC85.6 Question and Instruction - Commercial Bribery as a Ground for Exemplary
 PJC85.7 Question and Instructions - Misapplication of Fiduciary Property as Ground
 PJC85.8 Question and Instruction - Securing Execution of Document by Deception
 PJC85.9 Question and Instruction - Fraudulent Destruction as Ground
 PJC85.10 Question and Instruction - Theft as a Ground for Removing Limitation

ADMONITORY INSTRUCTIONS - BUSINESS

- PJC100.1 Instructions to Jury Panel Before Voir Dire - Business
 PJC100.2 Instructions to Jury After Selection - Business
 PJC100.3 Charge of the Court - Business
 PJC100.4 Additional Instruction for Bifurcated Trial - Business
 PJC100.5 Instructions to Jury After Verdict - Business
 PJC100.6 Instructions to Jury if Permitted to Separate - Business
 PJC100.7 Instruction if Jury Disagrees About Testimony - Business
 PJC100.8 Circumstantial Evidence (Optional) - Business

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PJC100.9 Proximate Cause
 PJC100.10 Instructions to Deadlocked Jury - Business
 PJC100.11 Instructions on Jurors' Note-Taking
 PJC100.12 Privilege - No Adverse Inference - Business

DTPA - INSURANCE CODE

PJC102.1 Question - False, Misleading or Deceptive Act or Practice, 17 46(b)
 PJC102.2 Description of Goods or Services or Affiliation of Persons, 17 46(b)(5)
 PJC102.3 Quality of Goods or Services, 17 46(b)(7)
 PJC102.4 Misrepresented and Unlawful Agreements, 17 46(b)(12)
 PJC102.5 Failure to Disclose Information, 17 46(b)(24)
 PJC102.6 Other 'Laundry List' Violations, 17 46(b)
 PJC102.7 Question - Unconscionable Action or Course, 17 50(a)(3) and 17 45(5)
 PJC102.8 Question - Warranty, 17 50(a)(2)
 PJC102.9 Express Warranty - Goods or Services; Superior Knowledge, 17 50(a)(2)
 PJC102.10 Implied Warranty of Merchantability - Goods, 17 50(a)(2)
 PJC102.11 Implied Warranty of Fitness for Particular Purpose, 17 50(a)(2)
 PJC102.12 Implied Warranty of Good and Workmanlike Performance, 17 50(a)(2)
 PJC102.13 Implied Warranty of Habitability, 17 50(a)(2)
 PJC102.14 Question - Chapter 541, Texas Insurance Code
 PJC102.16 Misrepresentation or False Advertising of Policy, Section 541.051(1)
 PJC102.17 False Information or Advertising - Insurance, Section 541.052
 PJC102.18 Unfair Insurance Settlement Practices, Section 541.060
 PJC102.19 Misrepresentation - Insurance, Section 541.061
 PJC102.21 Question - Knowing or Intentional Conduct
 PJC102.23 Question - Statute of Limitations, DTPA 17 565; Section 541.162

GOOD FAITH AND FAIR DEALING

PJC103.1 Good Faith and Fair Dealing - Insurance Claim Denial or Delay in Payment

FIDUCIARY DUTY

PJC104.1 Question & Instruction - Existence of Relationship of Trust & Confidence
 PJC104.2 Question and Instruction - Breach of Fiduciary Duty

FRAUD AND NEGLIGENT MISREPRESENTATION

PJC105.1 Question - Common Law Fraud
 PJC105.2 Common Law Fraud - Intentional Misrepresentation
 PJC105.3 Misrepresentation - Intentional
 PJC105.4 Common Law Fraud - Failure to Disclose When There Is Duty to Disclose
 PJC105.5 Question - Statute of Limitations - Common Law Fraud
 PJC105.7 Question - Statutory Fraud (Real Estate or Stock Transaction)
 PJC105.8 Statutory Fraud - Factual Misrepresentation
 PJC105.9 Statutory Fraud - False Promise
 PJC105.10 Question and Instruction on Benefitting from Statutory Fraud
 PJC105.11 Question and Instruction on Actual Awareness of Statutory Fraud
 PJC105.16 Question - Negligent Misrepresentation

INTERFERENCE WITH EXISTING AND PROSPECTIVE CONTRACT

PJC106.1 Question and Instruction - Intentional Interference with Existing Contract
 PJC106.3 Question - Defense of Legal Justification

EMPLOYMENT

PJC107.2 Instruction - Good Cause as Defense to Early Discharge
 PJC107.3 Question - Wrongful Discharge for Refusing to Perform an Illegal Act
 PJC107.4 Question and Instruction - Retaliation under Texas Whistleblower Act
 PJC107.5 Question and Instruction - Retaliation for Seeking Workers' Comp Benefits
 PJC107.6 Question and Instruction - Unlawful Employment Practices
 PJC107.7 Question - After-Acquired Evidence of Employee Misconduct
 PJC107.8 Instruction - Damages Reduct for After-Acquired Evid of Employee Misconduct
 PJC107.9 Question - Retaliation
 PJC107.10 Instruction - Constructive Discharge
 PJC107.11 Instruction - Disability
 PJC107.12 Instruction - Failure to Make Reasonable Workplace Accommodation
 PJC107.13 Question and Instruction - Undue Hardship Defense
 PJC107.14 Question - Good-Faith Effort to Make Reasonable Workplace Accommodation
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- 30-500 Mediation Information Sheet
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MANDAMUS & APPEAL

CORRESPONDENCE - MANDAMUS & APPEAL

- 31-001 Letter - Court Reporter - Request Reporter's Record
- 31-002 Letter - Clerk, Designate Matters in Clerk's Record

LITIGATION - MANDAMUS & APPEAL

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- 31-011 Docketing Statement
- 31-021 Petition for Writ of Mandamus
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- 31-040 Certificate of Parties and Attorneys - Recusal Facts