

Our automated system encompasses all areas of litigation. We've automated more than 1,150 procedural forms. It contains the State Bar of Texas' Collections Manual 3rd Ed.<sup>1</sup>, selections from the Texas Pattern Jury Charges<sup>1</sup>, 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

1-002	Client Information Sheet - DETAILED
1-003	Notice of Party's Current Address
1-009	Summary of Medical Bills (Manual)
1-010	Summary of Medical Bills (Chart)
1-011	Summary of Medical Treatment (Manual)
1-012	Summary of Medical Treatment (Chart)
1-013	Summary of Settlement Negotiations

### ATTORNEY - CLIENT CORRESPONDENCE

1-103	Letter to New Client - Fees, Expenses, Representation
1-104	Letter Declining Representation (Optional Release)
1-105	Letter to Client - Discovery to Answer
1-111	Letter to Client - Relocation of Office
1-112	Letter to Client - Notify of Deposition & Instructions
1-115	Letter to Client - Transmitting Final Payout
1-116	Letter to Client - Transmitting Court Costs

### ATTORNEY - CLIENT AGREEMENTS

1-151	Contract - Standard Personal Injury with Power of Attorney
1-152	Contract - General Contingent Fee (Short form)
1-153	Contract - Hourly and Expenses with Power of Attorney
1-161	Letter - Disbursement of Settlement Funds

### RELEASES

1-201	Release - General Records
1-202	Release - Medical Records Authorization (HIPAA)
1-203	Release - Medical Records & Discussions (HIPAA)
1-204	Release - Texas Workforce Commission Records
1-205	Release - Psychotherapy Records Authorization (HIPAA)

## GENERAL PROCEDURES & PRACTICE

### GENERAL CORRESPONDENCE

2-001	Letter to Clerk - General Transmittal
2-002	Letter to Court Reporter - General Transmittal
2-003	Letter to Opposing Counsel - General Transmittal
2-004	Letter to Opposing (pro se) Party - General
2-005	Letter to Sheriff - General Transmittal
2-006	Letter to Constable - General Transmittal
2-007	Letter to Private Process Server - General
2-008	Letter to Juror After Jury Duty

### CITATION, PROCESS & SUBPOENA

2-010	Waiver of Citation
2-011	Citation for Personal Service
2-012	Citation for Published Notice
2-013	Notice by Publication
2-014	Order Authorizing Service of Process, TRCP 103
2-015	Motion for Substituted Service, with Order, TRCP 106
2-016	Affidavit for Substituted Service by Publication

2-017	Motion for Substituted Service, with Order, TRCP 109a
2-018	Subpoena & Subpoena Duces Tecum
2-019	Motion to Quash Service, with Order
2-020	Motion to Quash Subpoena Duces Tecum, with Order
2-021	Response to Motion to Quash Subpoena Duces Tecum, with Order
2-022	Motion for Private Process, with Order

### PRE-TRIAL FILINGS AND MOTIONS

2-030	Motion for Docket Control Order
2-031	Docket Control Order
2-032	Demand for Jury Trial
2-034	Motion to Appoint Interpreter, with Order
2-035	Motion to Extend Time, with Order
2-036	Response to Motion to Extend Time, with Order
2-038	Forum Non Conveniens, with Order
2-039	Response to Forum Non Conveniens, with Order
2-040	Motion to Disqualify Attorney, with Order
2-041	Response to Motion to Disqualify Attorney, with Order
2-042	Motion to Disqualify Judge, with Order
2-043	Notice of Motion to Disqualify Judge
2-044	Response to Motion to Disqualify Judge, with Order
2-047	Motion to Recuse, with Order
2-049	Response to Motion to Recuse, with Order
2-051	Objection to Assigned (Visiting) Judge, with Order
2-053	Motion for Gag Order, with Order
2-054	Motion to Compel Electronic Filing, with Order
2-058	Motion for Pretrial Consolidation with Order, TRJA 11
2-059	Response to Motion for Pretrial Consolidation with Order, TRJA 11
2-061	Motion to Consolidate, with Order
2-062	Response to Motion to Consolidate, with Order
2-065	Petition, Deposition before Suit, with Order, TRCP 202
2-066	Response to Petition for TRCP 202 Deposition, with Order
2-073	Motion for Guardian Ad Litem, with Order
2-075	Motion for Separate Trial, with Order
2-076	Response to Motion for Separate Trial, with Order
2-077	Motion for Separate Trial, Exemplary Damages, with Order
2-078	Response, Motion for Separate Trial, Exemplary Damages, with Order
2-079	Motion for Sanctions, with Order, TRCP 13
2-080	Response to Motion for Sanctions, with Order, TRCP13
2-081	Motion for Sanctions, with Order, CPRC sec 10 001
2-082	Response to Motion for Sanctions, with Order, CPRC sec 10 001
2-083	Motion for Sanctions, Failure to Serve, with Order
2-084	Response to Motion for Sanctions, Failure to Serve, with Order
2-088	Request for Appointment of a Master, with Order
2-089	Objection to Appointment of a Master, with Order
2-090	Request for Record of Master's Proceedings
2-091	Objection to Master Appointed, with Order
2-092	Objection to Master's Report, with Order
2-095	Motion to Show Authority to Act, with Order
2-096	Response to Motion to Show Authority to Act, with Order
2-101	Motion to Seal Records, with Order & Temporary Order

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2-102	Response to Motion to Seal Court Records, with Order
2-103	Response to Motion for Temporary Sealing Order, with Order
2-104	Intervenor's Response to Motion to Seal, with Order
2-105	Motion to Reconsider Sealing Order, with Order
2-112	Designation of Attorney in Charge
2-113	Appearance of Counsel
2-114	Motion for Substitution of Counsel, with Order
2-115	Motion for Withdrawal of Counsel, with Order
2-116	Motion to Set for Trial, with Order
2-118	Motion to Abate, with Order (Defendant)
2-119	Response to Motion to Abate, with Order
2-121	Special Appearance with Order - Personal Jurisdiction
2-122	Response to Special Appearance, with Order
2-123	Motion to Transfer Venue, with Order (Plaintiff)
2-124	Response to Motion to Transfer Venue, with Order (Defendant)
2-125	Motion to Transfer Venue, with Order (Defendant)
2-126	Response, Motion to Transfer Venue, with Order (Plaintiff)
2-127	Joint Motion to Transfer Venue, with Order
2-128	Petition in Intervention
2-129	Motion to Strike Intervention, with Order
2-131	Motion to Continue Summary Judgment Hearing, with Order
2-135	Motion for Pre-Trial Conference
2-136	Order, Pre-Trial Conference
2-138	Motion for Preferential Setting, with Order
2-139	Motion for Special Setting, with Order
2-140	Motion to Continue Trial, with Order
2-141	Response to Motion to Continue Trial, with Order
2-142	Motion to Continue Hearing, with Order
2-143	Agreement to Conduct Hearing by Electronic Means, with Order
2-144	Motion to Strike from Jury Docket, with Order
2-145	Response to Motion to Strike from Jury Docket, with Order
2-146	Motion to Strike from Non-Jury Docket, with Order
2-147	Response to Motion to Strike from Non-Jury Docket, with Order
2-148	Withdrawal of Jury Demand, with Order
2-149	Objection to Withdrawal of Jury Demand, with Order
2-150	Motion to Appear Pro Hac Vice
2-151	Motion in Support of Appearance Pro Hac Vice, with Order
2-152	Pauper's Oath

**DISPOSITIVE MOTIONS**

2-153	Motion for Judgment on Agreed Statement of Facts
2-154	Response to Motion for Non-Suit, with Order
2-155	Motion for Non-Suit, with Order
2-156	Motion to Dismiss, Lack of Subject Matter Jurisdiction, with Order
2-157	Response to Plea to Jurisdiction, with Order
2-158	Motion for No Evidence Summary Judgment, with Order
2-159	Response to No Evidence Summary Judgment, with Order
2-160	Motion for Summary Judgment, with Order
2-161	Response to Summary Judgment, with Order
2-162	Motion to Strike - Summary Judgment Affidavit, with Order
2-163	Special Exceptions, with Order
2-164	Notice of Intent to Use Unfiled Discovery
2-165	Joint Motion for Nonsuit & Voluntary Dismissal, with Order
2-166	Motion to Dismiss, with Order
2-170	Certificate of Conference
2-175	Affidavit in Support of Attorney's Fees

**TRIAL WORK-UP**

2-200	Stipulations of Fact, with Order
2-201	Motion in Limine, with Order
2-202	Response to Motion in Limine, with Order
2-204	Motion to Sever, with Order
2-205	Response to Motion to Sever Claim, with Order
2-206	Motion to Equalize Jury Strikes, with Order
2-207	Response to Motion to Equalize Jury Strikes, with Order
2-208	Motion to Oppose Juror Challenges (Batson), with Order
2-210	Memorandum of Law (Shell)

2-214	Motion to Take Judicial Notice, with Order
2-215	Response to Motion to Take Judicial Notice, with Order
2-220	Motion to Permit Juror Note Taking, with Order
2-222	Response to Motion to Permit Juror Note Taking, with Order
2-225	Motion to Open and Close (Burden of Proof), with Order
2-226	Response to Motion to Open and Close (Burden), with Order
2-228	Motion to Open and Close (Affirmative Defense), with Order
2-229	Response to Motion to Open and Close (Affirmative Defense), with Order
2-235	Motion to Suppress Deposition, with Order
2-236	Response to Motion to Suppress Deposition, with Order
2-238	Motion to Strike Witness, with Order, TRCP 193 6
2-240	Motion to Exclude Expert Witness (Daubert), with Order
2-241	Response to Motion to Exclude Expert Witness (Daubert), with Order
2-351	Motion to Amend Pleading, with Order, TRCP 63
2-353	Objection to Motion to Amend - Before Trial, with Order
2-357	Motion to Strike Amended Pleading, with Order
2-358	Notice of Use at Trial of Self-Authenticated Document

**TRIAL PROCEEDINGS**

2-359	Motion to Amend Pleading, with Order, TRCP 66
2-361	Motion to Amend Pleading, with Order, TRCP 67
2-363	Motion to Amend Pleading After Verdict, with Order
2-365	Objection to Motion to Amend After Trial Commenced, with Order
2-391	Requested Special Jury Charge, with Order
2-393	Objections to the Jury Charge

**POST - TRIAL**

2-401	JUDGMENT - Non-Jury
2-402	JUDGMENT - Jury
2-403	JUDGMENT - Default
2-404	JUDGMENT - Default with Personal Injury Findings
2-405	Motion - Judgment Non Obstante Veredicto (NOV-Notwithstanding Verdict)
2-406	Objection to Motion - Judgment Non Obstante Veredicto (NOV), with Order
2-408	Motion for Directed Verdict, with Order
2-409	Objection to Motion for Directed Verdict, with Order
2-410	Motion for Mistrial, with Order
2-413	Motion for New Trial, with Order
2-415	Response to Motion for New Trial, with Order
2-417	Motion to Reinstate After Dismissal without Prejudice, with Order
2-418	Response to Motion to Reinstate, with Order
2-420	Request for Findings of Fact & Conclusions of Law
2-421	Response to Request for Findings of Fact
2-422	Notice of Past Due Findings of Fact & Conclusions
2-423	Request for Amended or Additional Findings and Conclusion
2-424	Motion for Judgment Nunc Pro Tunc, with Order
2-425	Response to Motion for Judgment Nunc Pro Tunc, with Order
2-427	Motion to Preserve Court Reporter's Notes, with Order
2-430	Motion to Enter Judgment, with Order
2-431	Motion to Sign Judgment, Losing Party, with Order
2-432	Motion to Reform Judgment, with Order
2-434	Motion to Reopen, with Order
2-440	Certificate of Last Known Mailing Address
2-441	Motion to Withdraw Funds, with Order
2-442	Motion for Determination of Lien
2-443	Motion to Return Posted Bond, with Order
2-445	Motion for Remittitur, with Order
2-446	Response to Motion for Remittitur, with Order
2-448	Motion for Default Judgment
2-449	Nonmilitary Affidavit - General litigation

**BILL OF REVIEW**

2-490	Petition for Bill of Review and Order
2-492	Answer, Bill of Review
2-494	Bill of Exception
2-496	Bill of Exception, Bystander

**SETTLEMENT**

2-502	Settlement Agreement & Release
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2-503 Refusal of Settlement Offer

#### **EQUITABLE AND INJUNCTIVE RELIEF**

2-605 Application for Temporary Restraining Order  
2-610 Application for Temporary Injunction  
2-615 Writ of Injunction

### **DISCOVERY**

#### **PRIVILEGES**

3-003 Affidavit - Attorney-Client - Work Product  
3-005 Affidavit - Consulting Expert  
3-007 Affidavit - Trade Secret  
3-009 Affidavit - Undue Burden  
3-011 Affidavit - Work Product (Non-Attorney)  
3-013 Withholding Statement, TRCP 193 3(a)  
3-014 Request for Information Withheld, TRCP 193 3(b)  
3-015 Response to Request Under TRCP 193 3(b)

#### **LETTERS - GENERAL**

3-032 Letter - Records Custodian - Employee Information  
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  
3-044 Request for Copy of Peace Officer's Crash Report  
3-045 Request for Person's Own Statement, TRCP 192 3(h)  
3-046 Request for Copy of Driver's Crash Report

#### **PRODUCTION OF DOCUMENTS & TANGIBLE THINGS**

3-101 Request for Production - General  
3-102 Response to Requests for Production  
3-103 Motion to Compel Production of Documents, with Order  
3-105 Notice - Subpoena Production From Non-party  
3-106 Supplemental or Amended Responses to Request for Production  
3-107 Agreement to Preserve the Confidentiality of Discovery Documents

#### **INSPECTION OF PREMISES**

3-201 Request - Inspection of Premises  
3-202 Response to Request for Inspection of Property  
3-203 Motion for Entry on Property

#### **INTERROGATORIES**

3-301 Interrogatories (Shell)  
3-302 Motion to Serve Additional Interrogatories, with Order  
3-304 Response to Interrogatories  
3-305 Motion to Compel Answers to Interrogatories, with Order  
3-306 Post-Judgment Interrogatories to Defendant  
3-308 Supplemental or Amended Answers to Interrogatories

#### **ADMISSIONS**

3-401 Requests for Admissions (Shell)  
3-402 Response to Requests for Admissions  
3-404 Motion to Compel Responses to Requests for Admissions, with Order  
3-407 Motion to Determine Sufficiency of Responses  
3-408 Motion to Deem Facts Admitted, with Order  
3-409 Response to Motion to Deem Facts Admitted  
3-411 Motion to Strike Deemed Admissions, with Order  
3-412 Response to Motion to Strike Deemed Admissions, with Order

#### **DEPOSITIONS**

3-450 Notice of Oral Deposition of Party  
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  
3-475 Response Motion to Quash Deposition Notice (Non-Party), with Order  
3-500 Notice of Deposition - Nonstenographic (Party)  
3-501 Notice of Deposition - Nonstenographic (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  
3-506 Motion to Compel Appearance at Deposition, with Order  
3-507 Motion to Compel Answers to Deposition Questions, with Order  
3-508 Motion for Contempt - Failure to attend deposition  
3-509 Response to Motion for Contempt - Missed Deposition  
3-510 Response to Motion to Compel (Deposition Question), with Order  
3-511 Order to Show Cause  
3-512 Judgment of Contempt - Missed Deposition  
3-519 Notice of Delivery of Deposition, Rule 203 3  
3-520 Deposition Officer's Certification

#### **DISCLOSURE**

3-601 Request for Disclosure  
3-602 Response to Request for Disclosure  
3-603 Motion to Compel Responses to Request for Disclosure, with Order

#### **GENERAL MOTIONS**

3-610 Certificate of Written Discovery  
3-611 Response to Motion to Compel (Written Discovery) with Order  
3-613 Motion to Examine the Person, with Order  
3-614 Response to Motion to Examine the Person, with Order  
3-623 Motion to Supplement or Amend Discovery Responses, with Order  
3-635 Motion to Modify Discovery Procedures, with Order  
3-638 Motion for Sanctions, with Order, TRCP 191 3  
3-639 Response to Motion for Sanctions, with Order, TRCP 191 3  
3-640 Motion to Extend Time to Respond to Discovery, with Order  
3-641 Response to Motion to Extend Time to Respond Discovery, with Order  
3-701 Motion for Level 3 Discovery Control Plan  
3-703 Order, Level 3 Discovery Control Plan  
3-718 Motion for Protective Order, with Order  
3-719 Response to Motion for Protective Order  
3-721 Motion for Sanctions, with Order, TRCP 215  
3-722 Response to Motion for Sanctions  
3-723 Motion and Judgment for Contempt (Comprehensive)  
3-724 Response to Motion for Contempt, with Order, (Party)  
3-725 Response to Motion for Contempt, with Order, (Non-Party)  
3-727 Motion to Designate Experts, with Order  
3-728 Motion to Reduce Expert Opinion, with Order  
3-729 Affidavit for Admission of Business Records  
3-730 Affidavit for Cost of Service by Custodian  
3-731 Notice of Filing of Business Records

#### **PLEADINGS - GENERAL**

4-001 Petition (Shell)  
4-010 Defendant's Original Answer (Counterclaim, Defenses, etc)  
4-011 Answer - General Denial

#### **DECLARATORY JUDGMENT**

4-200 Original Petition for Declaratory Judgment  
4-205 Answer, Petition for Declaratory Judgment  
4-210 Application for Supplemental Relief

#### **FOREIGN JUDGMENT**

4-300 Notice of Filing of Foreign Judgment  
4-305 Affidavit of Foreign Judgment  
4-310 Proof of Mailing Notice of Foreign Judgment

**MOTOR VEHICLE ACCIDENTS****CORRESPONDENCE - MOTOR VEHICLE ACCIDENT**

5-001	Demand Letter & Notice of Representation
5-002	Demand for Personal Injury Protection (PIP) Forms
5-003	Demand Letter - Uninsured Motorist
5-004	Demand Letter - Underinsured Motorist
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**

5-070	Request for Production - Motor Vehicle Accident
5-075	Interrogatories - Motor Vehicle Accident
5-080	Request for Admissions - Motor Vehicle Accident

**LITIGATION - MOTOR VEHICLE ACCIDENT**

5-085	Petition - Motor Vehicle Accident
5-086	Petition - Uninsured or Underinsured Motorist

**MEDICAL MALPRACTICE****CORRESPONDENCE - MEDICAL MALPRACTICE**

6-015	Letter - Transmitting Expert Report
6-016	Notice of Claim
6-017	Authorization for Release of Medical Records - Medical Malpractice

**DISCOVERY - MEDICAL MALPRACTICE**

6-050	Letter - Treating Physician (MD) - Request Information
6-051	Letter - Treating Physician (MD) - Request Records
6-052	Letter - Provider - Letter of Protection
6-053	Letter - Emergency Medical Service (EMS) - Records & Bills Request
6-054	Letter - Hospital - Billing Records Request
6-067	Letter - Hospital - Medical Records Request
6-068	Letter - Provider - Notification & Request
6-069	Letter - Provider - Transmitting Funds
6-070	Requests for Production - Medical Malpractice (Plaintiff's)
6-075	Interrogatories - Medical Malpractice (Plaintiff's)
6-080	Request for Admission - Medical Malpractice (Plaintiff's)

**LITIGATION - MEDICAL MALPRACTICE**

6-085	Petition - Medical Malpractice
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)
6-096	Settlement Agreement & Release - (Medical Malpractice)

**PREMISES LIABILITY****CORRESPONDENCE - PREMISES LIABILITY**

7-005	Notice Letter to Property Owner
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**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
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**PRODUCTS LIABILITY****CORRESPONDENCE - PRODUCTS LIABILITY**

8-005	Letter to Manufacturer Concerning Representation
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**DISCOVERY - PRODUCTS LIABILITY**

8-070	Request for Production - Products Liability
8-075	Interrogatories - Products Liability
8-080	Request for Admissions - Products Liability

**LITIGATION - PRODUCTS LIABILITY**

8-085	Petition - Products Liability
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**EMPLOYMENT****ATTORNEY-CLIENT RELATIONS**

9-001	Letter - Engagement
9-002	Worksheet - Client Intake
9-003	Memo - Consultation
9-004	Letter - Explanation of Administrative Process
9-005	Letter - Right to Sue - Agency Time Period Has Expired
9-006	Letter - Right to Sue - Agency Time Period Has Not Expired
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**

9-101	Letter, Cover - EEOC Investigator
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
9-107	Letter, Cover - Withdrawal of Charge
9-108	Letter - Withdrawal of Counsel
9-109	Memo - EEOC - Suggested Charge Language

**CORRESPONDENCE - TEXAS WORKFORCE COMMISSION - CIVIL RIGHTS DIVISION**

9-201	Letter, Cover - TWC - Civ Rights Div - Investigator
9-202	Letter - TWC - Civ Rights Div - Representation
9-203	Letter, Cover - Verified Intake Form
9-204	Form - TWC - Civ Rights Div - Intake
9-205	Form - TWC - Civ Rights Div - Intake (Blank)
9-206	Letter - Request for Right to File Civil Action
9-207	Letter - TWC - Civ Rights Div - Withdrawal of Counsel

**TEXAS WORKFORCE COMMISSION**

9-301	Wage Claim Form
9-302	Proposed Questions for Examination of Employer
9-303	Appeal of TWC Determination
9-304	Letter - TWC - Evidence for Appeal Tribunal Hearing
9-305	Request for Witness Subpoena
9-306	Appeal of TWC Tribunal Decision
9-307	Petition for Trial De Novo

**DEMAND LETTERS - EMPLOYMENT**

9-401	Demand Letter - Disability (ADA)
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
9-406	Demand Letter - Race, Color or National Origin
9-407	Demand Letter - Retaliation
9-408	Demand Letter - Religion
9-409	Demand Letter - Sex Discrimination
9-410	Demand Letter - Sexual Harassment
9-411	Demand Letter - Withholding of Pay
9-412	Demand Letter - Whistleblower
9-413	Demand Letter - Wrongful Discharge for Refusal to Perform Illegal Act
9-414	Demand Letter - Multiple Causes of Action

**DISCOVERY - EMPLOYMENT**

9-501	Interrogatories - Employer
9-502	Requests for Production - Employer
9-503	Interrogatories - Employee
9-504	Requests for Production - Employee

**SETTLEMENT DOCUMENTS**

- 9-601 Letter - Proposed Settlement  
 9-602 Tolling Agreement Regarding Settlement Negotiations

**LITIGATION - STATE**

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

**LITIGATION - FEDERAL**

- 9-801 Petition (Complaint) - Americans with Disabilities Act (ADA)  
 9-802 Petition (Complaint) - Age  
 9-805 Petition (Complaint) - Family Medical Leave Act  
 9-806 Petition (Complaint) - Race, Color or National Origin  
 9-808 Petition (Complaint) - Religion  
 9-809 Petition (Complaint) - Sex Discrimination  
 9-810 Petition (Complaint) - Sexual Harassment  
 9-813 Petition (Complaint) - Multiple Causes of Action  
 9-816 Notice - Removal  
 9-817 Motion - Federal - Remand, with Order  
 9-820 Civil Cover Sheet - Federal - All Districts  
 9-823 Summons - Federal - Civil Case  
 9-824 Notice of Lawsuit - with Waiver of Service  
 9-826 Motion - Pro Hac Vice, with Order

**DECEPTIVE TRADE PRACTICES ACT (DTPA)****CORRESPONDENCE - DTPA**

- 14-010 Notice of Claim - Deceptive Trade Practices Act (DTPA)  
 14-020 Request to Inspect and for Evidence of Defects  
 14-025 Response to Notice of Claim - Reject Claim or Offer Settlement

**PLEADINGS - DTPA**

- 14-050 Plaintiff's Original Petition  
 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)  
 14-105 Requests for Production (from DTPA claimant)  
 14-110 Interrogatories (to DTPA claimant)  
 14-115 Requests for Production (to DTPA claimant)

**POST-TRIAL - DTPA**

- 14-140 Judgment  
 14-145 Motion for Appointment of Receiver (with Order to Show Cause)  
 14-150 Order for Appointment of Receiver

**MISCELLANEOUS - DTPA**

- 14-200 Waiver of DTPA Rights

**CONTRACT LITIGATION****CORRESPONDENCE - CONTRACT LITIGATION**

- 15-005 Demand Letter - Breach of Contract  
 15-010 UCC Demand Letter  
 15-015 UCC Demand Letter - Seller

**DISCOVERY - CONTRACTS LITIGATION**

- 15-070 Request for Production - Contract Litigation  
 15-075 Interrogatories - Contract Litigation  
 15-080 Request for Admissions - Contract Litigation

**LITIGATION - CONTRACTS**

- 15-085 Petition  
 15-090 Defendant's Original Answer  
 15-092 Stipulations of Fact, with Order  
 15-093 Plea in Abatement, with Order  
 15-094 Motion in Limine, with Order  
 15-095 Judgment

**REAL ESTATE LITIGATION****TRESPASS TO TRY TITLE - REAL ESTATE LITIGATION**

- 16-005 Notice and Demand to Vacate the Premises  
 16-085 Petition - Trespass to Try Title  
 16-090 Defendant's Original Answer - Trespass to Try Title  
 16-092 Answer - Plea of Not Guilty  
 16-093 Demand for Abstract  
 16-094 Agreement of Common Source  
 16-095 Judgment - Trespass to Try Title

**QUIET TITLE - REAL ESTATE LITIGATION**

- 16-105 Demand Letter  
 16-185 Petition - Quiet Title  
 16-190 Defendant's Original Answer  
 16-195 Judgment

**PARTITION - REAL ESTATE LITIGATION**

- 16-205 Demand Letter  
 16-285 Petition  
 16-290 Defendant's Original Answer  
 16-292 Decree Ordering Partition and Sale  
 16-295 Writ of Partition  
 16-297 Final Decree Confirming Partition and Sale

**SPECIFIC PERFORMANCE - REAL ESTATE LITIGATION**

- 16-305 Tender of Performance of Purchase Agreement - Seller's  
 16-310 Tender of Performance of Purchase Agreement - Buyer's  
 16-385 Petition - Specific Performance  
 16-390 Defendant's Original Answer - Specific Performance  
 16-395 Judgment Granting or Denying Specific Performance

**DISCOVERY - REAL ESTATE LITIGATION**

- 16-470 Request for Production  
 16-475 Interrogatories  
 16-480 Request for Admissions

**MISCELLANEOUS REAL ESTATE LITIGATION DOCUMENTS**

- 16-505 Disclaimer of Interest in Land  
 16-510 Lis Pendens  
 16-515 Motion to Appoint Surveyor, with Order  
 16-525 Motion to Remove Improvements and Appoint Referee, with Order  
 16-530 Writ of Possession

**COLLECTIONS****PRACTICE**

- 24-0101 Client Information Sheet  
 24-0102 Letter to Client - Acknowledgment of Matter and Confirmation of Terms  
 24-0103 Client's Authorization for Attorney to Receive Payments  
 24-0104 Payment Record  
 24-0105 Letter to Client - Suit Recommended

**FINDING DEBTOR'S ASSETS**

- 24-0301 Letter to Postal Service Requesting Info Concerning Address  
 24-0302 UCC-11 Information Request (NOT SBOT)

**COMMUNICATING WITH DEBTOR**

- 24-0401 Demand Letter - Commercial Debt  
 24-0402 Demand Letter - Consumer Debt  
 24-0403 Notice of Intent to Accelerate  
 24-0404 Notice of Acceleration  
 24-0405 Presuit Letter Agreement

24-0406 Post-judgment Letter Agreement

### **REPOSSESSION**

24-0501 UCC-1 Financing Statement (NOT SBOT)  
 24-0502 Letter Requiring Debtor to Assemble Collateral at Convenient Location  
 24-0503 Notification of Disposition of Collateral  
 24-0504 Notice of Our Plan to Sell Property  
 24-0505 Letter to Debtor Giving Notice of Default and Intent to Accelerate  
 24-0506 Letter to Debtor Giving Notice of Acceleration  
 24-0507 Letter to Debtor Giving Notice of Deficiency After Sale  
 24-0508 Letter Notifying IRS of Intention to Sell Collateral  
 24-0509 Letter to Debtor Giving Notice of Intent to Retain Collateral  
 24-0510 Newspaper Notice of Public Sale

### **PRE-SUIT CONSIDERATIONS**

24-0601 Application to Confirm Arbitration Award

### **CREATION AND ENFORCEMENT OF LIENS**

24-0701 Affidavit to Fix Worker's Lien  
 24-0702 Petition & Application to Foreclose Worker's Lien  
 24-0703 Application & Affidavit - Sequestration Writ - Suit on Worker's Lien  
 24-0704 Notice of Sale - Worker's Possessory Lien (Vehicle, Boat, Vessel)  
 24-0705 First Notice of Sale - Worker's Possessory Lien (Other Property)  
 24-0706 Second Notice of Sale - Worker's Possessory Lien (Other Property)  
 24-0707 Notice to Owner of Filing of Lien Affidavit  
 24-0708 Notice of Claim to Owner and Original Contractor  
 24-0709 Notice to Owner Regarding Liens Against Homestead Property  
 24-0710 Contractor's Disclosure Statement for Residential Construction  
 24-0711 Contractor's List of Subcontractors and Suppliers  
 24-0712 Notice to Original Contractor by Second-Tier Claimant  
 24-0713 Notice Regarding Specially Fabricated Materials  
 24-0714 Notice of Agreement Providing for Retainage  
 24-0715 Affidavit Claiming Mechanic's and Materialman's Lien  
 24-0716 Cover Letter Sending Copy of Lien Affidavit  
 24-0717 Request for Information to Owner  
 24-0718 Request for Information to Original Contractor  
 24-0719 Request for Information to Subcontractor  
 24-0720 Contractor's Disbursement Disclosure for Residential Construction  
 24-0721 Bills Paid Affidavit  
 24-0722 Petition & Application to Foreclose Constitutional Lien - Personalty  
 24-0723 Application & Affidavit - Sequestration Writ - Constitutional - Personalty

### **PRE-JUDGMENT REMEDIES**

24-0801 Application for Prejudgment Writ of Garnishment  
 24-0802 Affidavit for Prejudgment Writ of Garnishment  
 24-0803 Order for Issuance of Prejudgment Writ of Garnishment  
 24-0804 Bond to Defendant  
 24-0805 Writ of Garnishment to be Served on Garnishee  
 24-0806 Officer's Return for Prejudgment Writ of Garnishment  
 24-0807 Notice of Garnishment  
 24-0808 Application & Affidavit for Writ of Sequestration  
 24-0809 Order for Issuance of Writ of Sequestration  
 24-0810 Writ of Sequestration  
 24-0811 Notice of Sequestration  
 24-0812 Officer's Return for Writ of Sequestration  
 24-0813 Plaintiff's Replevy Bond for Sequestered Property  
 24-0814 Application - Emergency Sale - Perishable Property (Sequestration)  
 24-0815 Affidavit for Emergency Sale of Perishable Property (after Sequestration)  
 24-0816 Order for Emergency Sale of Perishable Property (after Sequestration)  
 24-0817 Application for Writ of Attachment  
 24-0818 Affidavit for Writ of Attachment  
 24-0819 Order for Issuance of Writ of Attachment  
 24-0820 Writ of Attachment  
 24-0821 Notice of Attachment  
 24-0822 Officer's Return for Writ of Attachment  
 24-0823 Application for Emergency Sale of Attached Property (after Attachment)  
 24-0824 Affidavit for Emergency Sale of Attached Property (after Attachment)  
 24-0825 Order for Emergency Sale of Attached Property (after Attachment)

24-0826 Application & Affidavit - TRO & Temporary Injunction  
 24-0827 Order for Issuance of TRO & Temporary Injunction  
 24-0828 Temporary Restraining Order  
 24-0829 Order for Issuance of Temporary Injunction  
 24-0830 Temporary Injunction  
 24-0831 Bond to Defendant for Injunction

### **CAUSES OF ACTION**

24-1401 Petition for Suit on Sworn Account  
 24-1402 Verification for Suit on Sworn Account  
 24-1403 Petition for Suit on Written Contract  
 24-1404 Petition for Suit on Oral Debt  
 24-1405 Petition for Suit on Revolving Credit Account  
 24-1406 Petition for Suit on Retail Installment Contract  
 24-1407 Petition for Suit on Note  
 24-1408 Petition for Suit on Lease of Personal Property  
 24-1409 Petition for Deficiency Judgment  
 24-1410 Petition for Fraudulent Transfer Action  
 24-1411 Petition for Suit on Guaranty  
 24-1412 Affidavit and Proof of Mailing - Filing of Foreign Judgment  
 24-1413 Petition for Suit on Foreign Judgment

### **SERVICE OF PROCESS**

24-1601 Motion for Substituted Service  
 24-1602 Affidavit in Support of Motion for Substituted Service  
 24-1603 Order for Substituted Service  
 24-1604 Letter to Clerk Transmitting Motion for Substituted Service  
 24-1605 Letter Transmitting Citation for Service on Secretary of State  
 24-1606 Letter to Secretary of State  
 24-1607 Affidavit for Citation by Publication  
 24-1608 Letter to Clerk Requesting Issuance of Citation by Publication  
 24-1609 Letter to Officer Transmitting Citation to be Served by Publication  
 24-1610 Letter Requesting Clerk to Issue and Serve Citation by Publication  
 24-1611 Motion for Appointment of Attorney Ad Litem  
 24-1612 Order Appointing Attorney Ad Litem  
 24-1613 Order for Discharge and Compensation of Attorney Ad Litem

### **DISCOVERY**

24-1801 Notice to Nonparty of Request for Financial Records  
 24-1802 Motion to Inspect Financial Records of Nonparty  
 24-1803 Notice of Intention to Take Oral Deposition [with Subpoena Duces Tecum]  
 24-1804 Subpoena [with Duces Tecum Language]  
 24-1805 Notice of Intention to Take Deposition on Written Questions [Duces Tecum]  
 24-1807 Plaintiff's Request for Admissions - Collections  
 24-1814 Plaintiff's Written Interrogatories - Collections  
 24-1821 Plaintiff's Motion to Enlarge Number of Written Interrogatories  
 24-1822 Order Enlarging Number of Interrogatories  
 24-1823 Plaintiff's Requests for Disclosure  
 24-1824 Plaintiff's Request for Production of Documents and Tangible Things  
 24-1825 Plaintiff's Motion to Compel Discovery  
 24-1826 Order Compelling Discovery  
 24-1827 Plaintiff's Motion for Sanctions  
 24-1828 Order Imposing Sanctions

### **PRE-TRIAL AND TRIAL PROCEDURE**

24-1901 Business Records Affidavit - Collections  
 24-1902 Notice to Other Party of Filing of Business Records Affidavit  
 24-1903 Affidavit Concerning Cost and Necessity of Services  
 24-1904 Plaintiff's Response to Motion to Transfer Venue  
 24-1905 Affidavit Opposing Transfer  
 24-1906 Order Overruling Motion to Transfer Venue  
 24-1907 Motion to Take Judicial Notice of Law of Another State  
 24-1908 Order Taking Judicial Notice of Law of Another State  
 24-1909 Plaintiff's Motion for Summary Judgment  
 24-1916 Plaintiff's Summary Judgment Affidavit for Suit on Sworn Account  
 24-1917 Plaintiff's Summary Judgment Affidavit for Suit on Promissory Note  
 24-1918 Plaintiff's Summary Judgment Affidavit for Attorney's Fees

**JUDGMENT**

24-2001	Motion for Entry of Default Judgment - Collections
24-2002	Certificate of Last Known Mailing Address - Collections
24-2003	Nonmilitary Affidavit - Collections
24-2004	Default Judgment
24-2005	Judgment Nihil Dicit
24-2006	Final Summary Judgment
24-2007	Partial Summary Judgment
24-2008	Final Judgment (after trial of some issues)
24-2009	Agreed Judgment
24-2010	Judgment on Foreign Judgment
24-2011	Judgment Based on Trial to the Court
24-2012	Judgment Based on Jury Verdict
24-2013	Judgment Based on Directed Verdict

**POST-JUDGMENT DISCOVERY**

24-2601	Notice of Intention to Take Oral Deposition in Aid of Judgment (Short form)
24-2602	Notice of Intention to Take Oral Deposition in Aid of Judgment (Long form)
24-2603	Subpoena Duces Tecum (Nonparty witness, Post-judgment deposition)
24-2604	Plaintiff's Interrogatories in Aid of Judgment
24-2609	Motion to Compel Answers to Interrogatories in Aid of Judgment
24-2610	Order Compelling Answers to Interrogatories in Aid of Judgment
24-2611	Transmittal Letter to Respondent Following Hearing on Motion to Compel
24-2612	Motion to Hold Respondent in Contempt and for Show-Cause Order
24-2613	Show-Cause Notice
24-2614	Letter to Officer for Show-Cause Notice, Order, & Motion for Service
24-2615	Contempt Judgment
24-2616	Writ of Attachment and Commitment Order
24-2617	Order for Writ of Attachment
24-2618	Writ of Attachment (Post-judgment)

**POST-JUDGMENT PROCEDURE AND REMEDIES**

24-2701	Abstract of Judgment
24-2702	Letter to Client Explaining Judgment Lien
24-2703	Release of Judgment Lien
24-2704	Letter to Client Reporting That Judgment Cannot Be Collected
24-2705	Letter to Clerk Requesting Writ of Execution or Order of Sale
24-2706	Affidavit for Immediate Issuance of Writ of Execution
24-2707	Letter to Officer Transmitting Writ of Execution or Order of Sale
24-2708	Plaintiff's Original Petition to Revive Judgment
24-2709	Judgment Reviving Dormant Judgment
24-2710	Venditioni Exponas
24-2711	Application for Writ of Garnishment after Judgment
24-2712	Affidavit for Writ of Garnishment after Judgment
24-2713	Notice of Garnishment (Post-judgment)
24-2714	Officer's Return for Post-judgment Writ of Garnishment
24-2715	Judgment in Garnishment
24-2716	Application for Turnover Relief
24-2717	Order for Turnover Relief
24-2718	Motion for Post-judgment Receivership
24-2719	Order Appointing Receiver
24-2720	Bond of Receiver
24-2721	Oath of Receiver
24-2722	Order Approving Receiver's Fees
24-2723	Application for Charging Order
24-2724	Charging Order
24-2725	Assignment of Judgment and Judgment Lien
24-2726	Homestead Affidavit as Release of Judgment Lien

**LANDLORD-TENANT LAW**

24-2801	Petition & Application to Foreclose Landlord's Lien
24-2802	Affidavit & Lien Statement - Commercial Building Landlord's Lien
24-2803	Application for Distress Warrant
24-2804	Affidavit for Distress Warrant
24-2805	Order for Issuance of Distress Warrant
24-2806	Bond to Defendant for Distress Warrant
24-2807	Distress Warrant to be Served on Defendant

24-2808	Officer's Return for Distress Warrant
24-2809	Application - Emergency Sale of Perishable Property (Distress Warrant)
24-2810	Affidavit - Emergency Sale of Perishable Property (Distress Warrant)
24-2811	Order - Emergency Sale of Perishable Property (Distress Warrant)

**PROBATE AND GUARDIANSHIP**

24-2901	Authenticated Claim of Creditor
24-2902	Petition for Suit Against Dependent Personal Representative or Guardian
24-2903	Application for Sale of Collateralized Property
24-2904	Order Authorizing Sale of Collateralized Property
24-2905	Application for Foreclosure Sale of Mortgaged Property
24-2906	Order Authorizing Sale of Mortgaged Property
24-2907	Report of Sale of Personal or Real Property
24-2908	Decree Confirming Sale
24-2909	Petition for Suit Against Independent Executor or Administrator
24-2910	Suggestion of Death and Scire Facias

**BANKRUPTCY**

24-3501	Checklist - Bankruptcy
24-3504	Notice of Appearance - Bankruptcy
24-3505	Suggestion of Bankruptcy
24-3506	Proof of Claim (NOT SBOT)
24-3507	Motion to Allow Late Filing of Proof of Claim - Creditor's
24-3508	Order Granting Creditor's Motion to Allow Late Filing of Proof of Claim
24-3509	Reaffirmation Agreement (NOT SBOT)
24-3510	Motion for Relief from Automatic Stay
24-3511	Affidavit in Support of Motion for Relief from Automatic Stay
24-3512	Order Granting Motion for Relief from Automatic Stay
24-3513	Agreed Order Providing for Adequate Protection of Collateral
24-3514	Objection to Confirmation of Debtor's Chapter 13 Plan by Secured Creditor
24-3515	Objection to Confirmation of Debtor's Chapter 13 Plan by Unsecured Creditor
24-3516	Objection to Discharge of Debtor
24-3517	Objection to Discharge of a Specific Debt
24-3519	Motion to Compel Assumption or Rejection of Lease and Payment of Admin
24-3520	Order Granting Motion to Compel Assumption or Rejection of Lease

**PATTERN JURY CHARGES****MISCELLANEOUS PATTERN JURY DOCUMENTS**

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

**ADMINISTRATIVE 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
PJC1.11	Instructions on Juror's Note Taking
PJC1.12	Parallel Theories on Damages
PJC1.13	Instructions on Jurors' Use of Electronic Technology

**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**

- PJC10.1 Question - Employee  
 PJC10.2 Question - Borrowed Employee - Liability of Borrowing Employer  
 PJC10.3 Question - Borrowed Employee - Lending Employer's Rebuttal Instruction  
 PJC10.4 Question - Borrowed Employee - Disjunctive Submission of Liability  
 PJC10.5 Question - Employment as Defense Under Worker's Compensation Act  
 PJC10.6 Question - Scope of Employment  
 PJC10.7 Deviation  
 PJC10.8 Independent Contractor  
 PJC10.9 Independent Contractor by Written Agreement  
 PJC10.10 Question - Respondeat Superior - Nonemployee  
 PJC10.11 Question - Joint Enterprise  
 PJC10.12 Question - Negligent Entrustment - Driver  
 PJC10.13 Question - Negligent Entrustment - Defective Vehicle  
 PJC10.14 Question - Imputing Gross Negligence or Malice to a Corporation

**DEFENSES**

- PJC14.1 Limitations - Tolling by Diligence in Service

**PERSONAL INJURY DAMAGES**

- PJC15.1 Instruction Conditioning Damages Questions on Liability - Personal Injury  
 PJC15.2 Instruction - Personal Injury Damages - Income Taxes - Personal Injury  
 PJC15.3 Question - Personal Injury Damages - Personal Injury  
 PJC15.4 Question - Injury of Spouse - Personal Injury  
 PJC15.5 Question - Injury of Minor Child - Personal Injury  
 PJC15.6 Question - Parents' Loss of Services of Minor Child - Personal Injury  
 PJC15.7 Question - Exemplary Damages - Personal Injury  
 PJC15.8 Exclusionary Instruction for Other Condition - Personal Injury  
 PJC15.9 Instruction - Preexisting Condition That Is Aggravated - Personal Injury  
 PJC15.10 Exclusionary Instruction for Failure to Mitigate - Personal Injury  
 PJC15.11 Question - Child's Loss of Consortium - Parent's Injury - Personal Injury  
 PJC15.12 Question - Child's Loss of Consortium - Damages - Personal Injury

**WRONGFUL DEATH DAMAGES**

- PJC16.1 Instruction Conditioning Damages Question on Liability - Wrongful Death  
 PJC16.2 Instruction on Damages Subject to Income Taxes - Wrongful Death  
 PJC16.3 Question - Claim of Surviving Spouse - Wrongful Death  
 PJC16.4 Question - Claim of Surviving Child - Wrongful Death  
 PJC16.5 Question - Claim of Surviving Parents of Minor Child - Wrongful Death  
 PJC16.6 Question - Claim of Surviving Parents of Adult Child - Wrongful Death  
 PJC16.7 Question - Exemplary Damages - Wrongful Death  
 PJC16.8 Question - Apportionment of Exemplary Damages - Wrongful Death

**SURVIVAL DAMAGES**

- PJC17.1 Instruction Conditioning Damages Questions on Liability - Survival  
 PJC17.2 Instruction on Damages Subject to Income Tax - Survival Damages  
 PJC17.3 Question - Compensatory Damages - Survival

- PJC17.4 Question - Exemplary Damages - Survival

**PROPERTY DAMAGES**

- PJC18.1 Instruction Conditioning Damages Questions on Liability - Property  
 PJC18.2 Instruction on Damages Subject to Income Tax - Property Damages  
 PJC18.3 Question - Market Value Before and After Occurrence  
 PJC18.4 Question - Cost of Repairs and Loss of Use of Vehicle - Property

**MEDICAL MALPRACTICE - ADMONITORY INSTRUCTIONS**

- PJC40.1 Instructions to Jury Panel Before Voir Dire  
 PJC40.2 Instructions to Jury after Jury Selection  
 PJC40.3 Charge of the Court  
 PJC40.4 Additional Instruction for Bifurcated Trial  
 PJC40.5 Instructions to Jury After Verdict  
 PJC40.6 Instruction to Jury If Permitted to Separate  
 PJC40.7 Instruction If Jury Disagrees about Testimony  
 PJC40.8 Circumstantial Evidence (Optional)  
 PJC40.9 Instructions to Deadlocked Jury  
 PJC40.10 Privilege - No Adverse Inference  
 PJC40.11 Instructions on Jurors' Note Taking  
 PJC40.12 Parallel Theories on Damages  
 PJC40.13 Instructions on Jurors' Use of Electronic Technology

**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  
 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  
 PJC51.4 Question - Proportionate Responsibility  
 PJC51.5 Question - Proportionate Responsibility - Joinder of Contribution Defendant  
 PJC51.6 Question - Proportionate Responsibility, Derivative Claimant  
 PJC51.7 Question - Abandonment of Patient by Physician  
 PJC51.9 Question - Informed Consent, Common Law  
 PJC51.10 Question - Informed Consent (Statutory) - Procedure not on list A or B  
 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  
 PJC51.16 Question - Express Warranty  
 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

**NONMEDICAL MALPRACTICE - DEFINITIONS AND INSTRUCTIONS**

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

**NONMEDICAL PROFESSIONAL MALPRACTICE - THEORIES OF RECOVERY**

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

**PREMISES LIABILITY - DEFINITIONS AND INSTRUCTIONS**

PJC65.2	Negligence and Ordinary Care Other Than Owners or Occupiers
PJC65.3	Child's Degree of Care
PJC65.4	Proximate Cause
PJC65.5	New and Independent Cause
PJC65.6	Sole Proximate Cause
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 Liab
PJC66.4	Question - Plaintiff is Invitee
PJC66.5	Question - Plaintiff is Licensee
PJC66.6	Question - Plaintiff's Status in Dispute
PJC66.7	Question - Disjunctive Submission of Invitee-Licensee for Alternate Theories
PJC66.8	Question - Plaintiff-Licensee Injured by Gross Negligence
PJC66.9	Question - Plaintiff is Trespasser
PJC66.10	Question - Attractive Nuisance or Artificial Condition
PJC66.11	Question - Proportionate Responsibility
PJC66.12	Question - Proportionate - Joinder of Contribution Defendant
PJC66.13	Question - Proportionate Responsibility - Derivative Claimant
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
PJC71.4	Question - Design Defect
PJC71.5	Question - Marketing Defect - No or Inadequate Warning or Instruction
PJC71.6	Question - Misrepresentation (Section 402B)
PJC71.7	Question - Negligence in Products Cases
PJC71.8	Question - Negligent Undertaking
PJC71.9	Question - Breach of Implied Warranty of Merchantability UCC 2 314(b)(3)
PJC71.10	Question - Breach Implied Warranty Merchantability UCC 2 314(b)(1)(2)(4)(6)
PJC71.11	Question - Breach Implied Warranty-Particular Purpose Fitness UCC 2 315
PJC71.12	Question - Breach of Express Warranty (UCC 2 313)
PJC71.13	Question - Proportionate Responsibility
PJC71.14	Question - Proportionate Responsibility Joinder of Defendant
PJC71.15	Question - Proportionate Responsibility - Derivative Claimant

**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 - Malprac, Premises, Products
PJC80.5	Question - Injury of Minor Child - Personal Injury - Malprac, 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	Instruction Concerning Damages Limit in Health Care Suit
PJC80.11	Question - Child's Loss of Consortium - Parent's Injury
PJC80.12	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 - Malprac, Prem, Prod
PJC81.4	Question - Claim of Surviving Child - Wrongful Death - Malprac, Prem, Prod
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 - Malprac, 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 - Malprac, Prem, Prod
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	Nonmedical Professional Malpractice Economic Damages
PJC84.5	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

**ADMINISTRATIVE 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
PJC100.9	Instructions to Deadlocked Jury - Business
PJC100.10	Privilege - No Adverse Inference - Business
PJC100.11	Instructions on Jurors' Note-Taking
PJC100.12	Parallel Theories on Damages
PJC100.13	Instructions on Jurors' Use of Electronic Technology - Business
PJC100.14	Proximate Cause

**CONTRACTS**

PJC101.1	Question - Existence
PJC101.2	Question - Compliance
PJC101.3	Instruction - Formation of Agreement
PJC101.4	Instruction - Authority
PJC101.5	Instruction - Ratification
PJC101.8	Instruction - Ambiguous Provisions
PJC101.10	Instruction - Time of Compliance
PJC101.11	Instruction - Offer and Acceptance
PJC101.12	Instruction - Withdrawal or Revocation of Offer
PJC101.13	Instruction - Price
PJC101.21	Question - Defenses
PJC101.22	Instruction - Material Breach (Failure of Consideration)
PJC101.23	Instruction - Anticipatory Repudiation
PJC101.24	Instruction - Waiver
PJC101.25	Instruction - Equitable Estoppel
PJC101.26	Instruction - Duress
PJC101.27	Instruction - Undue Influence
PJC101.28	Instruction - Mutual Mistake of Fact
PJC101.29	Instruction - Mutual Mistake - Scrivener's Error
PJC101.30	Instruction - Novation
PJC101.31	Instruction - Modification
PJC101.32	Instruction - Accord and Satisfaction

PJC101.33 Instruction - Mental Capacity  
 PJC101.41 Question - Promissory Estoppel  
 PJC101.42 Question and Instruction - Quantum Meruit

#### **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 with Burden on Fiduciary  
 PJC104.3 Question and Instruction - Breach of Fiduciary Duty with Burden on Bene

#### **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  
 PJC105.12 Question and Instruction on Violation of Tx Securities Act - Factual Misrep  
 PJC105.13 Instruction on Violation of Tx Securities Act - Material Fact  
 PJC105.14 Question on Defense to Violation of Tx Securities Act - Fact Misrep  
 PJC105.15 Question on Defenses to Violation of Tx Securities Act - Buyer  
 PJC105.17 Question on Defense to Control-Person Liability  
 PJC105.18 Question and Instructions on Violation of Tx Securities Act - Aiding Violat  
 PJC105.19 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 and Instruction on 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  
 PJC107.15 Instruction - Sex Discrimination  
 PJC107.16 Instruction - Religious Observance or Practice  
 PJC107.17 Question and Instruction - Def of Undue Hrdshp to Accom Rel Obs or Prac  
 PJC107.18 Question - Limiting Relief in Unlawful Employment Practices  
 PJC107.19 Question and Instruction - Bona Fide Occupational Qualification Defense  
 PJC107.20 Question - Harassment  
 PJC107.21 Instruction - Sexual Harassment by Supervisor with Emp Act (Quid Pro Quo)  
 PJC107.22 Instruction - Harassment by Nonsupervisory Employee (Hostile Env)  
 PJC107.23 Instruction - Harassment by Supervisory Employee w/o Emp Act (Hostile Env)  
 PJC107.24 Question - Affirm Def to Harass Where No Tangible Employ Act Occurred

#### **PIERCING THE CORPORATE VEIL**

PJC108.1 Question - Piercing the Corporate Veil  
 PJC108.2 Instruction on Alter Ego  
 PJC108.3 Instruction on Sham to Perpetrate a Fraud  
 PJC108.4 Instruction on Evasion of Existing Legal Obligation  
 PJC108.5 Instruction on Circumvention of a Statute  
 PJC108.6 Instruction on Protection of Crime or Justification of Wrong  
 PJC108.7 Instruction on Monopoly

#### **CIVIL CONSPIRACY**

PJC109.1 Question and Instruction on Conspiracy

#### **DEFAMATION AND BUSINESS DISPARAGEMENT**

PJC110.2 Question and Instruction on Publication  
 PJC110.3 Question and Instructions on Defamatory  
 PJC110.4 Question and Instruction on Falsity  
 PJC110.5 Question and Instruction on Negligence  
 PJC110.6 Question and Instructions on Actual Malice  
 PJC110.8 Question and Instructions on Defense of Substantial Truth  
 PJC110.9 Question and Instructions on Defamatory False Impression  
 PJC110.10 Question and Instruction on Negligence (Defamatory False Impression)  
 PJC110.11 Question and Instructions on Actual Malice (Defamatory False Impression)  
 PJC110.12 Question on Defamatory Parody or Satire  
 PJC110.13 Question and Instruction on Negligence (Defamatory Parody or Satire)  
 PJC110.14 Question and Instruction on Actual Malice (Defamatory Parody or Satire)  
 PJC110.15 Business Disparagement

#### **DAMAGES - BUSINESS, CONSUMER, INSURANCE, EMPLOYMENT**

PJC115.1 Predicate - Instruction Conditioning Damages Question on Liability  
 PJC115.1.5 Instruction on Whether Compensatory Damages are Subject to Income Tax  
 PJC115.2 Question - Contract Damages  
 PJC115.3 Sample Instructions - Direct and Incidental Damages - Contracts  
 PJC115.4 Instruction on Consequential Damages - Contracts  
 PJC115.5 Question - Promissory Estoppel - Reliance Damages  
 PJC115.6 Question - Quantum Meruit Recovery  
 PJC115.7 Defensive Instruction on Mitigation - Contract Damages  
 PJC115.8 Question - Deceptive Trade Practices Damages  
 PJC115.9 Sample Instructions - Deceptive Trade Practice Damages  
 PJC115.11 Question - Additional Damages - Deceptive Trade Practices  
 PJC115.13 Question - Actual Damages under Insurance Code Chapter 541  
 PJC115.14 Question - Actual Damages for Breach of Duty, Good Faith & Fair Dealing  
 PJC115.16 Question - Profit Disgorgement - Amount of Profit  
 PJC115.17 Question - Fee Forfeiture - Amount of Fee  
 PJC115.18 Question - Actual Damages for Breach of Fiduciary Duty  
 PJC115.19 Question - Direct Damages Resulting from Fraud  
 PJC115.20 Question - Consequential Damages Caused by Fraud  
 PJC115.21 Question - Monetary Loss Caused by Negligent Misrepresentation  
 PJC115.22 Question - Damages, Interference with Contract  
 PJC115.24 Sample Instructions - Direct & Incidental Damages - Breach of Employment  
 PJC115.25 Defensive Instruction on Mitigation - Breach of Employment Agreement  
 PJC115.26 Question & Instruction - Wrongful Discharge Damages - Perform Illegal Act  
 PJC115.27 Question & Instruction - Damages for Retaliation Texas Whistleblower Act  
 PJC115.28 Damages - Retaliation for Seeking Workers' Compensation Benefits  
 PJC115.29 Exemplary Damages - Retaliation for Seeking Workers' Compensation  
 PJC115.30 Damages - Unlawful Employment Practices  
 PJC115.31 Predicate & Instruction - Exemplary Damages - Unlawful Employment Practice

PJC115.32 Question - Employer Liability - Exemplary Damages for Conduct of Supervisor  
 PJC115.33 Question and Instructions - Defamation General Damages  
 PJC115.34 Question and Instructions - Defamation Special Damages  
 PJC115.35 Proportionate Responsibility  
 PJC115.36 Predicate and Instruction on Award of Exemplary Damages  
 PJC115.37 Question and Instruction on Exemplary Damages  
 PJC115.38 Question and Instruction for Imputing Liability for Exemplary Damages  
 PJC115.39 Question - Securing Execution of Document by Deception  
 PJC115.40 Question - Destruction, Removal, Alteration, or Concealment of Writing  
 PJC115.41 Question - Forgery as Ground for Removing Limit on Exemplary Damages  
 PJC115.42 Question - Theft Ground for Removing Limitation on Exemplary Damages  
 PJC115.43 Question - Commercial (Fiduciary) Bribery - Remove Exemplary Limit  
 PJC115.44 Question - Misapplication of Fiduciary Property - Remove Exemplary Limit  
 PJC115.45 Question - Other Conduct Removing Limit on Exemplary Damages  
 PJC115.46 Question on Attorney's Fees

#### **ALTERNATIVE DISPUTE RESOLUTION**

30-100 Motion for Mediation, with Order  
 30-200 Court's Notice Intent to Refer to Alternative Dispute Resolution (ADR)  
 30-300 Motion to Refer to Alternative Dispute Resolution (Detailed), with Order  
 30-305 Motion to Refer to Alternative Dispute Resolution (Simple), with Order  
 30-350 Objection to Motion to Refer to Alternative Dispute Resolution, with Order  
 30-400 Objection to Court's Referral to Alternative Dispute Resolution, with Order  
 30-448 Order on Motion to Refer - Mediation  
 30-449 Agreed Order on Motion to Refer - Mediation  
 30-450 Order on Motion to Refer - Moderated Settlement  
 30-451 Agreed Order on Motion to Refer - Moderated Settlement  
 30-452 Order on Motion to Refer - Summary Trial  
 30-453 Agreed Order on Motion to Refer - Summary Trial  
 30-454 Agreed Order on Motion to Refer - Mini Trial  
 30-500 Mediation Information Sheet  
 30-600 Motion to Compel Arbitration, with Order  
 30-605 Objection to Motion to Compel Arbitration, with Order

## **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**

31-010 Designation of Matters In Clerk's Record  
 31-011 Docketing Statement  
 31-021 Petition for Writ of Mandamus  
 31-022 Mandamus - Appellate Brief Cover Sheet  
 31-035 Notice of Appeal  
 31-040 Certificate of Parties and Attorneys - Recusal Facts  
 31-050 Motion and Order for Interlocutory Appeal on Controlling Question of Law  
 31-055 Petition for Review of Interlocutory Order

## **ALL COUNTIES**

100-1 Civil Case Information Sheet  
 100-10 Unsworn Declaration