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**Jury Charge Extraordinaire** 



Hon. David Keltner,



Amanda Taylor, "he TCPA Lady"

LAW ELEVATED

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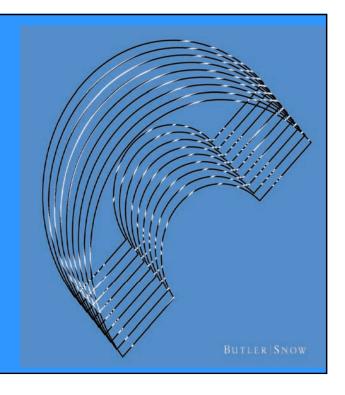
## Agenda:

- 1. Procedure and practical advis-
- 2. Preservation of error
- 3. Broad form vs. granulated submissions
- 4. Appellate review
  - \* Recent holdings
  - \* Tips from the bench

BUTLER SNOW

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# **Procedure and Practical Advice**



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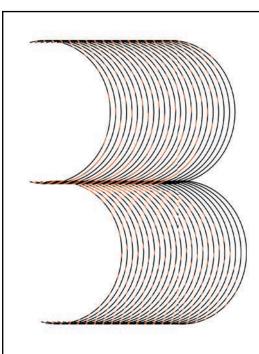
### **Start Early!**

#### **Benefits:**

- 1. Pleadings
  - TRAP 278
  - Hall v. Hall (Tyler 2023)
- 1. Discovery
- 2. Pre-trial motions
- 3. Success at trial



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#### **Pre-trial Conference**

- Charge is appropriate for discussion per Rule 166a(k)
- Proposed charge: Most courts require you to file pretrial
- Consider the charge when making time allotments!

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Title search: Jury Charge Update 2023

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