

# Update on the Texas Supreme Court

by  
Justice Jeff Boyd  
and  
Kurt Kuhn

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## Top Cases



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# Summary Judgment

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*FieldTurf USA, Inc. v. Pleasant Grove Indep. Sch. Dist.*  
No. 20-0507 (March 4, 2022)



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*FieldTurf USA, Inc. v. Pleasant Grove Indep. Sch. Dist.*

We agree with the reasoning of these decisions. A trial court's on-the-record, unequivocal oral ruling on an objection to summary judgment evidence qualifies as a ruling under Texas Rule of Appellate Procedure 33.1, regardless of whether it is reduced to writing.

*FieldTurf USA, Inc. v. Pleasant Grove Indep. Sch. Dist.*

Appellate courts do not consult the reporter's record of a summary judgment hearing to determine the trial court's grounds, if any, for its ruling on a summary judgment motion.

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