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## Introduction



Hon. David Keltner,  
Jury Charge Extraordinaire





Amanda Taylor,  
“The TCPA Lady”



LAW ELEVATED

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## **Agenda:**

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1. Procedure and practical advice
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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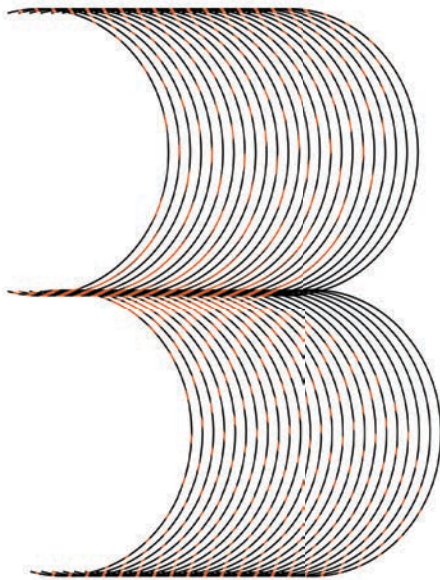
## Start Early!

### 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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Find the full text of this and thousands of other resources from leading experts in dozens of legal practice areas in the [UT Law CLE eLibrary \(utcle.org/elibrary\)](https://utcle.org/elibrary)

Title search: Jury Charge Update 2023

Also available as part of the eCourse

[2023 Appellate Practice Updates: Procedure and Jury Charges](#)

First appeared as part of the conference materials for the  
33<sup>rd</sup> Annual Conference on State and Federal Appeals session  
"Jury Charge Update"