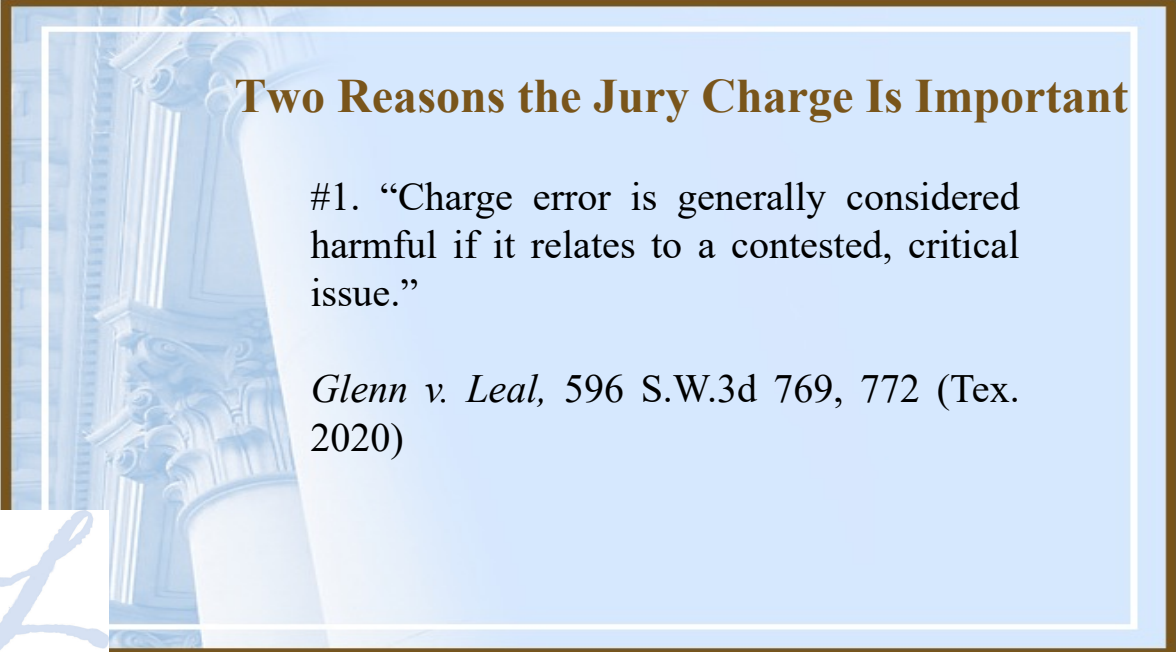


The Court's Charge 2024

Harvey Brown
Lanier Law Firm

The Lanier
Law Firm

1




Two Reasons the Jury Charge Is Important

#1. “Charge error is generally considered harmful if it relates to a contested, critical issue.”

Glenn v. Leal, 596 S.W.3d 769, 772 (Tex. 2020)

2




Two Reasons the Jury Charge Is Important

- #2. When there has been no objection to the charge, the sufficiency of the evidence is measured by the charge's definitions and instructions.
 - Even when the charge gets the law wrong.

3

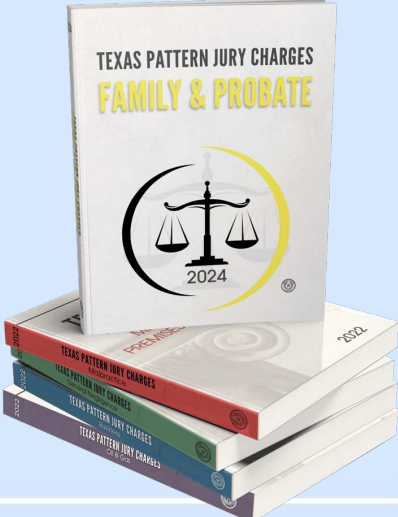
3



Drafting the Charge

Texas Pattern Jury Charges

Infallible and binding? No. Ford Motor Co. v. Ledesma (Tex. 2007)



The image shows a stack of four books titled "TEXAS PATTERN JURY CHARGES". The top book is "FAMILY & PROBATE" and features a scale of justice icon with the year "2024". The other books in the stack have spines with different colors (red, green, blue) and also display the title "TEXAS PATTERN JURY CHARGES".

4

Drafting the Charge

PJC Comments are your friends

9. *Medical care expenses* incurred in the past.

Answer: _____

10. *Medical care expenses* that, in reasonable probability, *Paul Payne* will incur in the future.

Answer: _____

Negligence at PJC 28.3 (2022)

5

Drafting the Charge

PJC Comments are your friends

9. **Reasonable expenses** of necessary *medical care* incurred in the past.

Answer: _____

10. Reasonable expenses of necessary *medical care* that, in reasonable probability, *Paul Payne* will incur in the future.

Answer: _____

Negligence PJC 28.3, Comment (2022)

6

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: The Court's Charge 2024

First appeared as part of the conference materials for the
34th Annual Conference on State and Federal Appeals session
"Jury Charge Update"