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UT Law – State & Federal Appeals


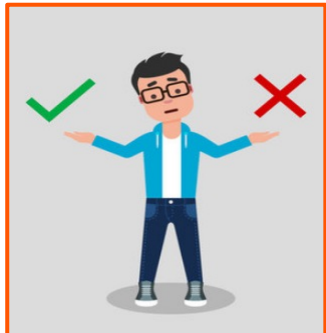

# Jury Charge Update 2023

**Amanda G. Taylor**

LAW ELEVATED

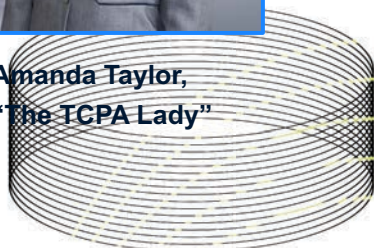
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## Introduction



**Hon. David Keltner,**  
Jury Charge Extraordinaire

**Amanda Taylor,**  
“The TCPA Lady”



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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

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## **Procedure and Practical Advice**

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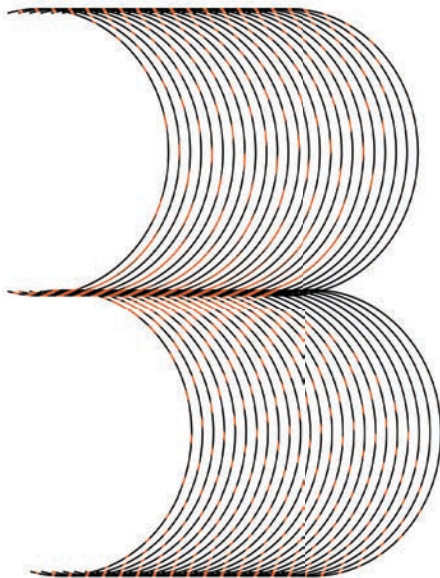
## Start Early!

### 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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[2023 eConference on State and Federal Appeals](#)

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"