



# Civil Litigation Table of Contents

	<b>CLIENT RELATIONS</b>
1.01	Contract - Contingent Fee
1.02	Contract - Hourly Plus Expenses
1.03	Letter Declining Representation
1.04	Notice of Party's Current Address
	<b>CORRESPONDENCE AND GENERAL ADMIN</b>
2.01	Letter to Client (shell)
2.02	Letter to Opposing Counsel (shell)
2.03	Letter to Government Official (clerk, judge, sheriff, constable, etc.) (shell)
	<b>REPRESENTATION</b>
3.01	Designation of Attorney in Charge
3.02	Appearance of Counsel
3.03	Motion for Leave to Substitute Counsel Order - Motion for Leave to Substitute Counsel
3.04	Motion for Leave to Withdraw as Counsel Order - Motion for Leave to Withdraw as Counsel
3.05	Motion for Leave to Withdraw and Substitute Counsel Order - Motion for Leave to Withdraw and Substitute Counsel
	<b>CIVIL CASE INFORMATION SHEET</b>
4.01	Civil Case Information Sheet
4.02	Civil Case Information Sheet - Justice Court
	<b>CITATION AND SERVICE</b>
5.01	Waiver of Citation
5.02	Motion for Substituted Service (TRCP 106) Order - Motion for Substituted Service (TRCP 106)
5.03	Motion for Substituted Service by Publication (TRCP 109a) Order - Motion for Substituted Service (TRCP 109a)
5.04	Motion for Service of Process by Private Process Server Order - Motion for Private Process
	<b>SETTLEMENT</b>
6.01	Defendant's Declaration Invoking Rule 167
6.02	Defendant's Settlement Offer Under Rule 167
6.03	Plaintiff's Settlement Offer Under Rule 167
6.04	Settlement and Mutual Release
	<b>GUARDIAN AD LITEM</b>
7.01	Agreed Motion for Appointment of Guardian Ad Litem Order - Agreed Motion To Appoint Guardian Ad Litem
7.02	Motion for Appointment of Guardian Ad Litem

	Order - Appointing Guardian Ad Litem
7.03	Response to Motion for Appointment of Guardian Ad Litem
	Order - Denying Appointment of Guardian Ad Litem
	<b>JUDGES, ASSOCIATE JUDGES AND MASTERS</b>
8.01	Motion for Referral to Associate Judge
8.02	Objection to Motion for Referral to Associate Judge
	Order - Motion for Referral to Associate Judge
	Order - Denying Motion for Referral to Associate Judge
8.03	Appeal From Associate Judge's Decision
8.04	Motion to Disqualify Judge
8.05	Response to Motion to Disqualify Judge
	Order - Disqualifying Judge
	Order - Referring Motion to Regional Presiding Judge
8.06	Motion to Recuse Judge
8.07	Response to Motion to Recuse
	Order - Recusing Judge
	Order - Referring Motion to Recuse to Regional Presiding Judge
8.08	Objection to Assigned Judge
8.09	Response to Objection to Assigned Judge
	Order - Removing Assigned Judge
8.10	Request for Appointment of Master
8.11	Objection to Appointment of Master
	<b>PLEADINGS (specific causes of action are in later sections)</b>
9.01	Petition (shell)
9.02	Original Answer
9.03	Motion for Leave to File Amended Pleading
9.04	Response to Motion for Leave to File Amended Pleading
	Order - Motion for Leave to File Amended Pleading
9.05	Motion to Strike Amended Pleading
	Order - Motion to Strike Amended Pleading
9.06	Special Exceptions
	Order - Special Exceptions
	<b>GENERIC MOTION AND ORDER (Shells)</b>
10.01	Motion
10.02	Order
10.03	Verification
10.04	Affidavit
	<b>JURISDICTION / SPECIAL APPEARANCE</b>
11.01	Motion to Dismiss for Lack of Jurisdiction
11.02	Response - Motion to Dismiss for Lack of Jurisdiction
	Order - Motion to Dismiss for Lack of Jurisdiction
11.03	Response to Plea to Jurisdiction
	Order - Plea to Jurisdiction
11.04	Defendant's Special Appearance - Personal Jurisdiction
11.05	Response to Special Appearance

	Order on Defendant's Special Appearance
11.06	Motion for Continuance to Conduct Jurisdiction Related Discovery
11.07	Response to Motion for Continuance to Conduct Jurisdiction Related Discovery
	Order - Motion for Continuance to Conduct Jurisdiction Related Discovery
	<b>VENUE</b>
12.01	Motion to Transfer Venue - Improper County or Convenience
12.02	Response to Motion to Transfer Venue - Improper County
	Order - Motion to Transfer Venue - Improper County or Convenience
12.03	Motion to Change Venue - Local Prejudice
12.04	Response to Motion to Change Venue - Local Prejudice
	Order - Motion to Transfer Venue - Local Prejudice
12.05	Agreed Motion to Transfer Venue
	Order - Agreed Motion to Transfer Venue
	<b>JURY DEMAND</b>
13.01	Demand for Jury Trial
13.02	Objection to Jury Demand
13.03	Withdrawal of Jury Demand
	<b>MISCELLANEOUS</b>
14.01	Certificate of Conference
14.02	Motion for Appointment of Interpreter
	Order - Motion for Appointment of Interpreter
	<b>SANCTIONS</b>
15.01	Motion for Sanctions - Rule 13 TRCP
	Order - Imposing Sanctions Under Rule 13
	<b>SUMMARY JUDGMENT, DEFAULT JUDGMENT AND NON-SUIT</b>
16.01	Certificate of Last Known Address
16.02	Affidavit of Military Status
16.03	Motion for Nonsuit
16.04	Response to Motion for Nonsuit
	Order - Motion for Nonsuit
16.05	Motion for Default Judgment
	Order - Motion for Default Judgment
16.06	Plaintiff's Motion for Summary Judgment
16.07	Response to Plaintiff's Motion for Summary Judgment
	Order - Plaintiff's Motion for Summary Judgment
16.08	Plaintiff's Motion for Summary Judgment on Defendant's Counterclaim
16.09	Response to Plaintiff's Motion for Summary Judgment on Defendant's Counterclaim
	Order - Plaintiff's Motion for Summary Judgment on Defendant's Counterclaim
16.10	Defendant's Motion for Summary Judgment
16.11	Response to Defendant's Motion for Summary Judgment
	Order - Defendant's Motion For Summary Judgment
16.12	Motion for Judgment on Agreed Statement of the Facts
	<b>PRETRIAL</b>

17.01	Motion for Pretrial Conference
	Order - Setting Pretrial Conference
17.02	Agreed Motion For Continuance
	Order - Agreed Motion For Continuance
17.03	Motion for Continuance
17.04	Response to Motion for Continuance
	Order - Motion for Continuance
17.05	Motion to Extend Time
17.06	Response to Motion to Extend Time
	Order - Motion to Extend Time
	<b>DOCKETS AND SETTINGS</b>
18.01	Motion to Set for Trial - Jury Docket
	Order - Setting Case on Jury Docket
18.02	Motion to Set for Trial - Nonjury Docket
	Order - Setting Case on Nonjury Docket
18.03	Motion for Special Setting
	Order - Motion for Special Setting
18.04	Motion for Preferential Setting
	Order - Motion for Preferential Setting
18.05	Motion to Strike from Nonjury Docket
18.06	Response to Motion to Strike from Nonjury Docket
	Order - Motion to Strike from Nonjury Docket
18.07	Motion to Withdraw Case from Jury Docket
18.08	Objection to Motion to Withdraw Case from Jury Docket
	Order - Motion to Withdraw Case from Jury Docket
18.09	Motion to Strike Case from Jury Docket
	Order - Motion to Strike Case from the Jury Docket
	<b>JUDICIAL NOTICE</b>
19.01	Motion to Take Judicial Notice (Adjudicative Fact)
19.02	Response to Motion to Take Judicial Notice
	Order - Motion to Take Judicial Notice
19.03	Motion to Take Judicial Notice - Other State or Federal Law
19.04	Response to Motion to Take Judicial Notice - Other State's Law
	Order - Motion to Take Judicial Notice - Other State's Law
19.05	Motion to Take Judicial Notice - Foreign Law
19.06	Response to Motion to Take Judicial Notice - Foreign Law
	Order - Motion to Take Judicial Notice - Foreign Law
	<b>JURY</b>
20.01	Motion to Equalize Jury Strikes
20.02	Response to Motion to Equalize Jury Strikes
	Order - Motion to Equalize Jury Strikes
20.03	Objection to Use of Peremptory Challenges (Batson)
20.04	Response to Objection to Use of Peremptory Challenges (Batson)
	Order - Objection to Use of Peremptory Challenges
	<b>TRIAL PROCEDURE MOTIONS</b>

21.01	Motion to Open and Close
21.02	Response to Motion to Open and Close
	Order - Motion to Open and Close
21.03	Motion for Leave to Amend Pleadings - (Rule 66 - cure defect or omission)
21.04	Response to Motion for Leave to Amend Pleadings (cure defect or omission)
	Order - Motion for Leave to Amend Pleadings
21.05	Motion for Leave to Amend Pleadings - Rule 67 - (conform pleadings to issues)
21.06	Response to Motion for Leave to Amend Pleadings - (Rule 67)
	Order - Motion for Leave to Amend Pleadings
	<b>EXCLUSION OF EVIDENCE</b>
22.01	Motion in Limine
	Order - Motion in Limine
22.02	Motion to Suppress Deposition
22.03	Response to Motion to Suppress Deposition
	Order - Motion to Suppress Deposition
22.04	Motion to Exclude Witness Testimony
22.05	Response to Motion to Exclude Witness Testimony
	Order - Motion to Exclude Witness Testimony
22.06	Motion to Exclude Expert Testimony
22.07	Response to Motion to Exclude Expert Testimony
	Order - Motion to Exclude Expert Testimony
	<b>SUBPOENAS</b>
23.01	Subpoena (Duces Tecum)
23.01	Motion to Quash Subpoena (and for Protective Order)
	Order- Motion to Quash (and for Protective Order)
	<b>***GENERAL DISCOVERY***</b>
	(NOTE: Discovery for specific causes of action can be found in
	later sections for each cause of action)
24.00	Certificate of Written Discovery
	<b>DISCOVERY - Motions</b>
25.01	Motion for Level 3 Discovery Control Plan
	Order - Level 3 Discovery Control Plan
25.02	Motion for Leave to Supplement or Amend Responses
25.03	Response to Motion for Leave to Supplement or Amend Discovery Responses
	Order - Motion for Leave to Supplement or Amend Responses
25.04	Motion to Modify Discovery Control Plan
25.05	Response to Motion to Modify Discovery Control Plan
	Order - Motion to Modify Discovery Control Plan
25.06	Motion to Extend Time to Respond to Discovery
25.07	Response to Motion to Extend Time to Respond to Discovery
	Order - Motion to Extend Time to Respond to Discovery
25.08	Motion to Quash Deposition Notice
25.09	Response to Motion to Quash Deposition Notice
	Order - Motion to Quash Deposition Notice

	<b>DISCOVERY - Objections and Enforcement</b>
26.01	Objection to Request for Disclosure
26.02	Objection to Interrogatories
26.03	Objection to Request for Admissions
26.04	Objection to Request for Production
26.05	Objection to Request for Entry Upon Real Property
26.06	Objection to Notice of Deposition
26.07	Motion for Protective Order
	Protective Order
26.08	Response to Motion for Protective Order
	Order Denying Motion for Protective Order
26.09	Motion to Compel Responses to Interrogatories
26.10	Response to Motion to Compel Responses to Interrogatories
	Order - Motion to Compel Responses to Interrogatories
26.11	Motion to Compel Response to Requests for Disclosure
26.12	Response to Motion to Compel Responses to Requests for Disclosure
	Order - Motion to Compel Response to Requests for Disclosure
26.13	Motion to Compel Response to Requests for Admissions
26.14	Response to Motion to Compel Responses to Requests for Admissions
	Order - Motion to Compel Response to Requests for Admissions
26.15	Motion to Compel Response to Requests for Production
26.16	Response to Motion to Compel Responses to Requests for Production
	Order - Motion to Compel Response to Requests for Production
26.17	Motion to Compel Answers to Deposition Questions
26.18	Response to Motion to Compel Answers to Deposition Questions
	Order - Motion to Compel Answers to Deposition Questions
26.19	Motion to Compel Appearance at Deposition
26.20	Response to Motion to Compel Appearance at Deposition
	Order - Motion to Compel Appearance at Depositions
26.21	Motion for Contempt - Failure to Attend Deposition
	Order to Show Cause - Contempt for Failure to Attend Deposition
26.22	Response to Motion for Contempt - Missed Deposition
26.23	Judgment of Contempt - Failure to Attend Deposition
26.24	Motion to Deem Facts Admitted
	Order - Deeming Facts Admitted
26.25	Response to Motion to Deem Facts Admitted
	<b>DISCOVERY - Records and Documents</b>
27.01	Notice of Filing of Business Records Through Affidavit
27.02	Affidavit Authenticating Business Records
27.03	Notice of Intent to Use Self-Authenticated Document
27.04	Notice Requesting Production of Documents
	<b>DISCOVERY - Inspection of Premises (Generic)</b>
28.01	Request for Entry on Property
28.02	Response to Request for Entry On Property
	Order - Request for Entry on Property
28.03	Motion for Permission to Enter Property of a Nonparty

28.04	Response to Motion for Permission to Enter Property of a Nonparty
	Order - Motion for Permission to Enter Property of a Nonparty
	<b>DISCOVERY - Request for Production (Generic)</b>
29.01	Request for Production Generic)
29.02	Response to Request for Production (Generic)
29.03	Supplemental or Amended Response to Request for Production
	<b>DISCOVERY - Interrogatories (Generic)</b>
30.01	Interrogatories
30.02	Responses to Interrogatories
30.03	Supplemental or Amended Answers to Interrogatories
30.04	Motion for Leave to Serve Additional Interrogatories
	Order - Granting Leave to Serve Additional Interrogatories
	<b>DISCOVERY - Admissions (Generic)</b>
31.01	Request for Admissions (Shell)
31.02	Response to Request for Admissions
31.03	Motion to Withdraw or Amend Admission of Fact
	Order - Granting Motion to Withdraw or Amend Admission of Fact
	<b>DISCOVERY - Disclosure (Generic)</b>
32.01	Request for Disclosure
32.02	Response to Request for Disclosure
	<b>DISCOVERY - Depositions</b>
33.01	Notice of Intent to Take Oral Deposition
33.02	Notice of Intention to Take Deposition on Written Questions
33.03	Cross Questions for Written Deposition
	<b>***SPECIFIC CAUSES OF ACTION***</b>
	(NOTE: The forms under each cause of action are specific to that
	specific cause of action)
	<b>BREACH OF CONTRACT</b>
34.01	Letter Canceling Contract for Breach
34.02	Original Petition - Breach of Contract
34.03	Original Answer - Breach of Contract
34.04	Request for Production (Breach of Contract)
34.05	Plaintiff's Interrogatories (Breach of Contract)
34.06	Defendant's Interrogatories
34.07	Plaintiff's Request for Admissions
34.08	Defendant's Request for Admissions
	<b>MEDICAL MALPRACTICE</b>
35.01	Notice of Health Care Liability Claim
35.02	Authorization for Release of Protected Health Information
35.03	Original Petition - Medical Malpractice
35.04	Original Answer - Medical Malpractice

35.05	Plaintiff's Requests for Production
35.06	Defendant's Requests for Production
35.07	Plaintiff's Interrogatories (Med Mal)
35.08	Defendant's Interrogatories
35.09	Plaintiff's Request for Admissions
35.10	Defendant's Request for Admissions
	<b>PREMISES LIABILITY</b>
36.01	Original Petition - Premises Liability
36.02	Original Answer - Premises Liability
36.03	Plaintiff's Requests for Production
36.04	Defendant's Requests for Production
36.05	Plaintiff's Interrogatories (Premises Liability)
36.06	Defendant's Interrogatories
36.07	Plaintiff's Request for Admissions
36.08	Defendant's Request for Admissions
	<b>PRODUCTS LIABILITY</b>
37.01	Original Petition - Products Liability
37.02	Original Answer - Products Liability
37.03	Plaintiff's Request for Production
37.04	Defendant's Requests for Production
37.05	Plaintiff's Interrogatories (Products Liability)
37.06	Defendant's Interrogatories
37.07	Plaintiff's Request for Admissions
37.08	Defendant's Request for Admissions
	<b>MOTOR VEHICLE ACCIDENTS</b>
38.01	Original Petition - Motor Vehicle Accident
38.02	Original Answer - Motor Vehicle Accident
38.03	Request for Production (Motor Vehicles)
38.04	Plaintiff's Interrogatories (Motor Vehicle)
38.05	Defendant's Interrogatories
38.06	Plaintiff's Request for Admissions
38.07	Defendant's Request for Admissions
	<b>DECEPTIVE TRADE PRACTICES (DTPA)</b>
39.01	Notice of Claim - DTPA (Demand Letter)
39.02	Original Petition - DTPA
39.03	Original Answer - DTPA
39.04	Plaintiff's Requests for Production
39.05	Defendant's Requests for Production
39.06	Plaintiff's Interrogatories (DTPA)
39.07	Defendant's Interrogatories
39.08	Plaintiff's Request for Admissions
39.09	Defendant's Request for Admissions
	<b>COLLECTIONS</b>
40.01	Demand Letter - Consumer Debt



40.02	Demand Letter - Commercial Debt
	<b>FINDINGS OF FACT</b>
41.01	Request for Findings of Fact and Conclusions of Law
41.02	Response to Request for Findings of Fact
41.03	Notice of Past Due Findings of Fact and Conclusions of Law
41.04	Request for Amended or Additional Findings of Fact and Conclusions of Law
	<b>POST TRIAL</b>
42.01	Motion to Set Aside Default Judgment
	Order - Motion to Set Aside Default Judgment
42.02	Motion to Set Aside Judgment - Military Service
	Order - Motion to Set Aside Judgment - Military Service
42.03	Motion for New Trial - After Jury Trial
42.04	Motion for New Trial - After Nonjury Trial
42.05	Motion for New Trial - After Default Judgment
	Order - Motion for New Trial
42.06	Motion for Judgment Nunc Pro Tunc
	Order Granting Judgment Nunc Pro Tunc
42.07	Motion to Modify Judgment
	Order Modifying Judgment
42.08	Motion for Withdrawal of Exhibits
	Order - Withdrawal of Exhibits
	<b>APPEAL</b>
43.01	Notice of Appeal
43.02	Request for Preparation of Reporter's Record
43.03	Request for Preparation of Clerk's Record
43.04	Letter to District Clerk Transmitting Written Designation for Filing
43.05	Designation of Additional Items to be Included in Clerk's Record