Rodriguez Personal Injury: Motor Vehicle Collisions

	0. Intake & Case Evaluation
0.01	Personal Injury Client Intake Form
	Printable Blank Personal Injury Client Intake Form
	1. Retainer & Fee Agreements
1.01	Contract - Contingent Fee
1.02	Personal Injury Retainer Agreement
1.03	Personal Injury Referral and Fee Sharing Agreement
1.04	Limited Scope Representation
1.05	Letter Declining Representation
1.06	Letter Releasing Representation
1.07	Demand Letter for Attorney Fees
1.08	Affidavit of Attorney Fees
	2. Investigation
2.01	CR-3 Peace Officer's Crash Report (Blank)
2.02	CR-3 Code Sheet
2.03	Public Information Request (Texas)
2.04	Federal FOIA Request
	3. Medical Records, Authorizations & Provider Correspondence
3.01	Texas Attorney General HIPAA Authorization Form (Official Form)
3.02	Authorization for Release of Protected Health Information
3.03	Cover Letter to Medical Provider Requesting Records With HIPAA Authorization
3.04	Letter - Information Request of Treating Physician
3.05	Letter - Records Request of Treating Physician
3.06	Letter - Medical Records Request to Hospital
3.07	Letter - Billing Records Request to Hospital
3.08	Letter - Records Request to EMS
3.09	Letter - Follow Up on Records Request
3.10	Letter - of Protection
3.11	Letter - Transmitting Funds to Provider
3.12	Letter - Request for Reduction of Bill to Provider
3.15	Business Records Affidavit
3.16	Medical Records Affidavit
3.17	Notice of Filing of Medical and Billing Records Affidavit
3.18	Medical Expense Affidavit Under TCPRC 18.001
3.19	Affidavit Concerning Cost and Necessity of Services - TCPRC 18.002(a)
3.20	Affidavit Concerning Cost and Necessity of Services - TCPRC 18.002(b)
	4. Pre-Suit Insurance Demands & Claims
4.01	Letter of Representation to At-Fault Driver
4.02	Letter of Representation to Liability Insurance Company
4.03	Letter of Representation and Settlement Offer

4.04	Personal Injury Protection Demand Letter
4.05	Uninsured Motorist Demand Letter
4.06	Underinsured Motorist Demand Letter
4.07	Liability Carrier Demand Letter
4.08	Stowers Demand Letter
4.09	Response to Stowers Demand
	5. Client & General Correspondence
5.01	Client Letter - Shell
5.02	Client Letter - Scope and Cost of Representation
5.03	Client Letter - Change of Firm Address
5.04	Client Letter - Instructions for Upcoming Deposition
5.05	Preparation Instructions for Deposition
5.06	Client Letter - for Initial Disclosures
5.07	Letter to Opposing Counsel (shell)
5.08	Letter to Government Official - clerk, judge, sheriff, constable (shell)
5.09	Letter to Clerk - Transmittal
5.10	Letter of Initial Contact to Expert Witness
5.11	Letter to Expert Witness for Preparation of Deposition and Trial Testimony
	6. Attorney Representation & Appearance
6.01	Designation of Attorney in Charge
6.02	Appearance of Counsel
6.03	Appearance of Co-Counsel
6.04	Co-Counsel Agreement
6.05	[Agreed] Motion for Leave to Substitute Counsel
6.06	Order on Motion for Leave to Substitute Counsel
6.07	Motion for Leave to Withdraw as Counsel
6.08	Order on Motion for Leave to Withdraw as Counsel
6.09	Motion for Leave to Withdraw and Substitute Counsel
6.10	Order on Motion for Leave to Withdraw and Substitute Counsel
6.11	Attorney Vacation Letter
	7. Commencing Suit - Pleadings, Jury Demand, & Preserving Evidence
7.01	Civil Case Information Sheet
7.02	Civil Case Information Sheet - Justice Court
7.03	Plaintiff's Original Petition
7.04	Plaintiff's Original Petition - Uninsured or Underinsured Motorist
7.06	Demand for Jury Trial
7.07	Objection to Jury Demand
7.08	Withdrawal of Jury Demand
7.11	Preservation Letter - Commercial Vehicle
7.12	Letter to Opposing Party/Counsel - Preservation of Evidence
7.13	Application for TRO, and Injunctive Relief for Preservation of Evidence
7.14	Affidavit in Support of Application for TRO, & TIR to Preserve Evidence
7.15	TRO for Preservation of Evidence [and Order Setting Hearing]
7.16	Order Granting Temp Injunction for Preservation of Evidence and Order Setting Hearing
	8. Citation & Service

8.01	Waiver of Citation
8.02	Order Authorizing Service of Citation (TRCP 103)
8.03	Motion for Substituted Service (TRCP 106)
8.04	Affidavit in Support of Motion for Substituted Service (TRCP 106)
8.05	Order on Motion for Substituted Service (TRCP 106)
8.06	Motion for Other Substituted Service (TRCP 109a)
8.07	Affidavit in Support of Motion for Other Substituted Service (TRCP 109a)
8.08	Order on Motion for Other Substituted Service (TRCP 109a)
8.09	Motion for Service of Process by Private Process Server
8.10	Affidavit in Support of Motion for Service of Process by Private Server
8.11	Order on Motion for Private Process
8.12	Motion for Substitute Service by Publication (TRCP 109)
8.13	Affidavit in Support of Motion for Substitute Service of Process by Publication
8.14	Order on Motion for Substitute Service by Publication (TRCP 109)
8.15	Citation for Notice by Publication
8.16	Request for Change of Address Information Needed for Service
8.17	Return of Service on Individual Defendant - In Person
8.18	Letter to Clerk - Reissue Citation
	9. Defensive Pleadings & Responsive Motions
9.01	Defendant's Original Answer
9.02	Affidavit in Support of Defendant's Original Answer
9.05	Defendant's Motion for Leave to Designate Responsible Third Party
9.06	Order Setting Hearing - Motion for Leave to Designate Responsible Third Party
9.07	Order Granting Motion for Leave to Designate Responsible Third Party
9.08	Special Exceptions
9.09	Order on Special Exceptions
9.10	Motion for Leave to File Amended Pleading
9.11	Response to Motion for Leave to File Amended Pleading
9.12	Order on Motion for Leave to File Amended Pleading
9.13	Motion to Strike Amended Pleading
9.14	Order on Motion to Strike Amended Pleading
	10. Jurisdiction, Venue, & Dismissals
10.01	Plea to Jurisdiction and Motion to Dismiss for Lack of Jurisdiction
10.02	Affidavit in Support of Plea to Jurisdiction and Motion to Dismiss
10.03	Response to Plea to Jurisdiction and Motion to Dismiss
10.04	Affidavit in Support of Response to Plea to Jurisdiction and Motion to Dismiss
10.05	Order on Plea to Jurisdiction and Motion to Dismiss
10.06	Defendant's Special Appearance - Personal Jurisdiction
10.07	Affidavit in Support of Defendant's Special Appearance
10.08	Response to Special Appearance
10.09	Affidavit in Support of Plaintiff's Response to Defendant's Special Appearance
10.10	Order on Defendant's Special Appearance
10.11	Motion for Continuance to Conduct Jurisdiction-Related Discovery
10.12	Affidavit in Support of Motion for Continuance - Jurisdiction Related Discovery
10.13	Response to Motion for Continuance to Conduct Jurisdiction-Related Discovery
10.14	Order on Motion for Continuance to Conduct Jurisdiction-Related Discovery
10.15	Defendant's Motion to Dismiss

10.16	Plaintiff's Motion to Retain and Response to Motion to Dismiss
10.17	Affidavit in Support of Motion to Retain
10.18	Order on Defendant's Motion to Dismiss
10.19	Motion to Dismiss Baseless Cause of Action
10.20	Response to Motion to Dismiss Baseless Cause of Action
10.21	Order on Motion to Dismiss Baseless Cause of Action
10.22	Joint Motion for Nonsuit and Voluntary Dismissal
10.23	Order for Nonsuit and Voluntary Dismissal
10.24	Motion to Reinstate After Dismissal Without Prejudice
10.25	Affidavit in Support of Motion to Reinstate After Dismissal Without Prejudice
10.26	Order Granting Motion to Reinstate After Dismissal Without Prejudice
10.27	Response to Motion to Reinstate
10.28	Affidavit in Support of Response to Motion to Reinstate
10.29	Order Denying Motion to Reinstate After Dismissal Without Prejudice
10.30	Motion to Transfer Venue - Improper County or Convenience
10.31	Affidavit in Support of Motion to Transfer Venue - Improper County
10.32	Response to Motion to Transfer Venue - Improper County
10.33	Affidavit in Support of Response to Motion to Transfer Venue
10.34	Order on Motion to Transfer Venue - Improper County or Convenience
10.36	Motion to Change Venue - Local Prejudice
10.37	Movant's Affidavit in Support of Motion to Change Venue
10.38	Residents' Affidavits in Support of Motion to Change Venue
10.39	Response to Motion to Change Venue - Local Prejudice
10.40	Affidavit in Support of Response to Motion to Change Venue
10.41	Order on Motion to Transfer Venue - Local Prejudice
10.43	Agreed Motion to Transfer Venue
10.44	Order on Agreed Motion to Transfer Venue
	11. Discovery - Written
	Disclosures
11.01	Initial Disclosures (TRCP 194)
11.02	Request for Compliance of Initial Disclosures
11.03	Pretrial Disclosures
11.04	Testifying Expert Disclosures and Reports
	MVA-specific sets
11.15	Plaintiff's Discovery to Defendant
11.16	Defendant's Discovery to Plaintiff
	Discovery - Generic Responses & Motions
11.27	Response to Request for Production
11.28	Supplemental or Amended Response to Request for Production
11.29	Response to Interrogatories
11.30	Supplemental or Amended Answers to Interrogatories
11.31	Motion for Leave to Serve Additional Interrogatories
11.32	Order Granting Leave to Serve Additional Interrogatories
11.33	Response to Request for Admissions
11.34	Motion to Withdraw or Amend Admission of Fact
11.35	Affidavit in Support of Motion to Withdraw or Amend Admission of Fact
11.36	Order Granting Motion to Withdraw or Amend Admission of Fact
11.37	Certificate of Written Discovery

11.38	Notice Requesting Production of Documents
11.39	Notice of Intent to Use Self-Authenticated Document
11.40	Affidavit Authenticating Business Records
	12. Discovery - Depositions
	Before Suit
12.01	Petition to Take Depositions Before Suit
12.02	Order Granting Petition to Take Depositions Before Suit
12.03	Response to Petition for Depositions Before Suit
12.04	Order Denying Petition for Depositions Before Suit
12.05	Notice of Court Proceeding on Petition to Take Deposition Before Suit
12.06	Notice to Persons With Adverse Interest - Court Proceeding to Take Deposition
	General
12.16	Motion for Telephone Deposition or Testimony
12.17	Order Granting Motion for Telephone Deposition or Testimony
12.18	Motion to Shorten Time for Taking Video Deposition
12.19	Order Granting Motion to Shorten Time for Deposition Notice
12.20	Notice of Intent to Take Oral Deposition
12.21	Notice of Intention to Take Deposition on Written Questions
12.22	Deposition Outline - Defendant Driver
12.23	Deposition Outline - Defendant Company Corporate Representative (Commercial)
12.24	Deposition Outline - Plaintiff Driver
12.25	Cross Questions for Written Deposition
12.26	Notice of Delivery of Deposition
12.27	Certification of Transcript or Recording of Deposition
12.28	Letter to Videographer for Deposition Set Up
12.29	Letter - Rule 11 Agreement for Deposition
12.30	Filing for Rule 11 Agreement for Deposition
	Out-of-State Witness
12.40	Motion for Letter of Request to Depose Out-of-State Witness
12.41	Order for Letter of Request to Depose Out-of-State Witness
12.42	Letter of Request for Deposition
12.43	Motion for Letter Rogatory to Depose Out-of-State Witness
12.44	Order for Letter Rogatory to Depose Out-of-State Witness
12.45	Letter of Rogatory
12.46	Notice to Take Deposition Outside of Texas
	13. Discovery - Records, Subpoenas & Premises Inspection
13.01	Request for Entry on Property
13.02	Response to Request for Entry on Property
13.03	Order on Request for Entry on Property
13.04	Motion for Permission to Enter Property of a Nonparty
13.05	Response to Motion for Permission to Enter Property of a Nonparty
13.06	Order on Motion for Permission to Enter Property of a Nonparty
13.07	Subpoena [Duces Tecum]
13.08	Motion to Quash Subpoena [and for Protective Order]
13.09	Order on Motion to Quash [and for Protective Order]
13.10	Response to Motion to Quash Subpoena Duces Tecum
13.11	Order Denying Motion to Quash Subpoena Duces Tecum

13.12	Notice of Subpoena for Documents From Nonparty
	14. Discovery - Objections & Compelling Discovery
	Objections & Protective Orders
14.01	Objection to Requests for Disclosure
14.02	Objection to Interrogatories
14.03	Objection to Request for Admissions
14.04	Objection to Request for Production
14.05	Objection to Request for Entry Upon Real Property
14.06	Objection to Notice of Deposition
14.07	Motion for Protective Order
14.08	Protective Order
14.09	Response to Motion for Protective Order
14.10	Order Denying Motion for Protective Order
14.11	Letter - Notice of Deficiency
	Motions to Compel Discovery
14.21	Plaintiff's Motion to Compel Discovery
14.22	Order Setting Hearing on Plaintiff's Motion to Compel Discovery
14.23	Order Granting Plaintiff's Motion to Compel Discovery
14.24	Motion to Compel Responses to Interrogatories
14.25	Response to Motion to Compel Responses to Interrogatories
14.26	Order on Motion to Compel Responses to Interrogatories
14.27	Motion to Compel Response to Requests for Disclosure
14.28	Response to Motion to Compel Responses to Request for Disclosure
14.29	Order on Motion to Compel Response to Requests for Disclosure
14.30	Motion to Compel Response to Requests for Admissions
14.31	Response to Motion to Compel Responses to Requests for Admissions
14.32	Order on Motion to Compel Response to Requests for Admissions
14.33	Motion to Compel Response to Requests for Production
14.34	Response to Motion to Compel Responses to Requests for Production
14.35	Order on Motion to Compel Response to Requests for Production
14.36	Motion to Compel Answers to Deposition Questions
14.37	Response to Motion to Compel Answers to Deposition Questions
14.38	Order on Motion to Compel Answers to Deposition Questions
14.39	Motion to Compel Appearance at Deposition
14.40	Response to Motion to Compel Appearance at Deposition
14.41	Order on Motion to Compel Appearance at Depositions
14.42	Motion for Contempt - Failure to Attend Deposition
14.43	Order to Show Cause - Contempt for Failure to Attend Deposition
14.44	Response to Motion for Contempt - Missed Deposition
14.45	Judgment of Contempt - Failure to Attend Deposition
	15. Discovery- Admissions, Supplementation, Privilege & Control
	Deemed Admissions, Examinations & Expert Designation
15.01	Motion to Deem Facts Admitted
15.02	Order on Deeming Facts Admitted
15.03	Response to Motion to Deem Facts Admitted
15.04	Motion to Examine Person
15.05	Order Granting Motion to Compel Examination[s]

15.06	Motion for Expert Witness Designation (cases filed before Jan. 1, 2021)
15.07	Order Granting Motion Requiring Expert Witness Designation
15.08	Motion for Reduction of Opinion of Expert Witness to Tangible Form TRCP 195
15.09	Order Granting Motion for Reduction Expert Opinions to Tangible Form
	Supplementation, Extensions & Quashing Notices
15.20	Motion for Leave to Supplement or Amend Responses
15.21	Motion to Amend or Supplement Discovery - Rule 193.5 TRCP
15.22	Order Granting Motion to Amend or Supplement Discovery - Rule 193.5 TRCP
15.23	Response to Motion for Leave to Supplement or Amend Discovery Responses
15.24	Order on Motion for Leave to Supplement or Amend Responses
15.25	Motion to Extend Time to Respond to Discovery
15.26	Response to Motion to Extend Time to Respond to Discovery
15.27	Order on Motion to Extend Time to Respond to Discovery
15.28	Motion to Quash Deposition Notice
15.29	Response to Motion to Quash Deposition Notice
15.30	Order on Motion to Quash Deposition Notice
15.32	Order on Motion to Extend Deadline for Expert Report
	Privilege & Work Product
15.41	Affidavit of Attorney-Client Work Product
15.42	Affidavit of Consulting Expert
15.44	Affidavit of Undue Burden
15.45	Affidavit for Non-Attorney Work Product
15.46	Withholding Statement to Preserve Privilege - TRCP 193.3
15.47	Request to Identify Information or Material Withheld - 193.3
15.48	Response to Request for Description of Privileged Information
	Discovery Control Plan & Rule 11 Agreements
15.60	Motion for Level 3 Discovery Control Plan
15.61	Order on Level 3 Discovery Control Plan
15.62	Motion to Modify Discovery Control Plan
15.63	Response to Motion to Modify Discovery Control Plan
15.64	Order on Motion to Modify Discovery Control Plan
15.65	Letter to Opposing Counsel - Rule 11 Agreement for Discovery
15.66	Notice of Filing Rule 11 Agreement for Discovery
	16. Pretrial Motions & Case Management
	Pretrial Conferences & Scheduling
16.01	Motion for Pretrial Conference
16.02	Order on Setting Pretrial Conference
16.03	Docket Control Order
	Continuances, Extensions & Service
16.21	Motion for Continuance
16.22	Affidavit in Support of Motion for Continuance
16.23	Response to Motion for Continuance
16.24	Order on Motion for Continuance
16.25	Agreed Motion for Continuance
16.26	Order on Agreed Motion for Continuance
16.27	Notice of Conflicting Setting and Motion for Continuance
16.28	Motion to Extend Time
16.29	Response to Motion to Extend Time

16.30	Order on Motion to Extend Time
16.31	Motion to Quash Service of Process
16.32	Order Granting Motion to Quash Service of Process
16.33	Agreed Motion to Retain Case on Docket
16.34	Order Granting Motion to Retain Case on Docket
	Consolidation & Trial Structure
16.51	Motion to Consolidate
16.52	Order Granting Motion to Consolidate
16.53	Response to Motion to Consolidate
16.54	Order Denying Motion to Consolidate
16.55	Motion for Separate Trial
16.56	Order Granting Motion for Separate Trial
16.57	Response to Motion for Separate Trial
16.58	Order Denying Motion for Separate Trials
16.59	Motion for Bifurcated Trial, Exemplary Damages
16.60	Order Granting Motion for Bifurcated Trial
16.61	Response to Motion for Bifurcated Trial, Exemplary Damages
16.62	Order Denying Motion for Bifurcated Trials
	Sealing & Intervention
16.81	[Motion for Temporary Sealing Order and] Motion to Seal Records
16.82	Affidavit in Support of Motion for Temporary Sealing Order [Mtn to Seal Records]
16.83	Order Sealing Court Records
16.84	Affidavit to Seal Records
16.85	Response to Motion to Seal Records
16.86	Affidavit in Support of Response to Motion to Seal Records
16.87	Order Denying the Sealing of Court Records
16.88	Response to Temporary Motion to Seal Records
16.89	Affidavit in Support of Response to Temporary Motion to Seal Records
16.90	Order Denying Motion to Temporarily Seal Court Records
16.91	Response to Motion to Seal Records [Intervenor]
16.92	Affidavit in Support of Response to Motion to Seal Records [Intervenor]
16.93	Motion to Reconsider Sealing the Court Records
16.94	Affidavit in Support of Motion to Reconsider Sealing the Court Records
16.95	Order on Motion for Reconsideration
16.96	Motion to Strike Petition for Intervention
16.97	Order Striking Petition for Intervention
	17. Trial Settings, ADR & Judicial Assignment
	Dockets & Trial Settings
17.01	Motion to Set for Trial - Jury Docket
17.02	Order on Setting Case on Jury Docket
17.03	Motion to Set for Trial - Nonjury Docket
17.04	Order on Setting Case on Nonjury Docket
17.05	Motion for Special Setting
17.06	Order on Motion for Special Setting
17.07	Motion for Preferential Setting
17.08	Order on Motion for Preferential Setting
17.09	Motion to Strike From Nonjury Docket
17.10	Response to Motion to Strike From Nonjury Docket

17.11	Order on Motion to Strike From Nonjury Docket
17.12	Motion to Withdraw Case From Jury Docket
17.13	Objection to Motion to Withdraw Case From Jury Docket
17.14	Order on Motion to Withdraw Case From Jury Docket
17.15	Motion to Strike Case From Jury Docket
17.16	Order on Motion to Strike Case From the Jury Docket
17.17	Notice of Trial Setting
17.18	Letter - Rule 11 Agreement to Extend Deadline, Reset or Pass Proceeding
17.19	Notice - Rule 11 Agreement to Extend Deadline, Reset or Pass Proceeding
	Mediation
17.31	Motion for Mediation
17.32	[Agreed] Order Referring Case to Mediation
	Judicial Assignment, Recusal & Masters
17.51	Motion for Referral to Associate Judge
17.52	Objection to Motion for Referral to Associate Judge
17.53	Order on Motion for Referral to Associate Judge
17.54	Order Denying Motion for Referral to Associate Judge
17.55	Appeal From Associate Judge's Decision
17.56	Notice of Motion to Disqualify
17.57	Motion to Disqualify Judge
17.58	Response to Motion to Disqualify Judge
17.59	Order Disqualifying Judge
17.60	Order Referring Motion to Regional Presiding Judge
17.61	Motion to Recuse Judge
17.62	Response to Motion to Recuse
17.63	Order Recusing Judge
17.64	Order Referring Motion to Recuse to Regional Presiding Judge
17.65	Objection to Assigned Judge
17.66	Response to Objection to Assigned Judge
17.67	Order Removing Assigned Judge
17.68	Request for Appointment of Master
17.69	Objection to Appointment of Master
17.70	Motion for Appointment of Interpreter
17.71	Order on Motion for Appointment of Interpreter
	18. Settlement Offers (Rule 167)
18.01	Defendant's Declaration Invoking Rule 167
18.02	Defendant's Settlement Offer Under Rule 167
18.03	Plaintiff's Settlement Offer Under Rule 167
18.04	Refusal of Settlement Offer
	19. Guardian Ad Litem
19.01	Agreed Motion for Appointment of Guardian Ad Litem
19.02	Order on Agreed Motion to Appoint Guardian Ad Litem
19.03	Motion for Appointment of Guardian Ad Litem
19.04	Order on Appointing Guardian Ad Litem
19.05	Response to Motion for Appointment of Guardian Ad Litem
19.06	Order on Denying Appointment of Guardian Ad Litem

	20. Motions in Limine & Exclusion of Evidence
20.01	Plaintiff's Motion in Limine
20.02	Order Setting Hearing on Plaintiff's Motion in Limine
20.03	Order Granting Plaintiff's Motion in Limine
20.04	Motion in Limine (general)
20.05	Order on Motion in Limine
20.06	Motion to Suppress Deposition
20.07	Response to Motion to Suppress Deposition
20.08	Order on Motion to Suppress Deposition
20.09	Motion to Exclude Witness Testimony
20.10	Response to Motion to Exclude Witness Testimony
20.11	Order on Motion to Exclude Witness Testimony
20.12	Motion to Exclude Expert Testimony
20.13	Response to Motion to Exclude Expert Testimony
20.14	Order on Motion to Exclude Expert Testimony
20.15	Motion to Take Judicial Notice (Adjudicative Fact)
20.16	Response to Motion to Take Judicial Notice
20.17	Order on Motion to Take Judicial Notice
20.18	Motion to Take Judicial Notice - Other State or Federal Law
20.19	Response to Motion to Take Judicial Notice - Other State's Law
20.20	Order on Motion to Take Judicial Notice - Other State's Law
20.21	Motion to Take Judicial Notice - Foreign Law
20.22	Response to Motion to Take Judicial Notice - Foreign Law
20.23	Order on Motion to Take Judicial Notice - Foreign Law
	21. Dispositive Motions - Default & Nonsuit
21.01	Motion for Nonsuit
21.02	Response to Motion for Nonsuit
21.03	[Agreed] Order on Motion for Nonsuit
21.04	Motion for Default Judgment
21.05	Order on Motion for Default Judgment
21.06	Default Judgment With Personal Injury Findings
21.07	Default Judgment (general)
21.08	Motion for Judgment on Agreed Statement of the Facts
	22. Summary Judgment
	Traditional Summary Judgment
22.01	Plaintiff's Traditional Motion for Summary Judgment
22.02	Order Granting Plaintiff's Traditional Motion for Summary Judgment
22.03	Response to Plaintiff's Traditional Motion for Summary Judgment
22.04	Order Denying Plaintiff's Traditional Motion for Summary Judgment
22.05	Defendant's Traditional Motion for Summary Judgment
22.06	Order Granting Defendant's Traditional Motion for Summary Judgment
22.07	Response to Defendant's Traditional Motion for Summary Judgment
22.08	Order Denying Defendant's Traditional Motion for Summary Judgment
22.09	Plaintiff's Traditional Motion for Summary Judgment on Defendant's Counterclaim
22.10	Order Granting Traditional Motion for Summary Judgment on Counterclaim
22.11	Response to Traditional Motion for Summary Judgment on Defendant's Counterclaim
22.12	Order Denying Traditional Motion for Summary Judgment on Counterclaim

22.13	Motion to Strike Traditional Summary Judgment Affidavit
22.14	Order Granting Motion to Strike Traditional Summary Judgment Affidavit
	No-Evidence Summary Judgment
22.31	No-Evidence Motion for Summary Judgment
22.32	Order Granting No-Evidence Motion for Summary Judgment
22.33	Response to No-Evidence Motion for Summary Judgment
22.34	Order Denying No-Evidence Motion for Summary Judgment
22.35	Verified Motion for Continuance of No-Evidence MSJ Response
22.36	Order Granting Verified Motion for Continuance of No-Evidence MSJ Response
	Withdrawal & Supporting Affidavits
22.51	Withdrawal of Motion for Summary Judgment
22.58	Affidavit or Declaration in Support of Motion for Summary Judgment
22.59	Affidavit or Declaration in Opposition to Motion for Summary Judgment
22.60	Counteraffidavit or Declaration - Motion for Summary Judgment
	23. Trial
	Liability & Damages Preparation
23.01	Liability and Damages Proof Checklist
23.02	Exhibit List
23.03	Plaintiff's Witness List
23.04	Witness List (general)
23.05	Brief Medical Summary
23.06	Medical Billing Summary
	Jury
23.21	Motion to Equalize Jury Strikes
23.22	Response to Motion to Equalize Jury Strikes
23.23	Order on Motion to Equalize Jury Strikes
23.24	Objection to Use of Peremptory Challenges (Batson)
23.25	Response to Objection to Use of Peremptory Challenges (Batson)
23.26	Order on Objection to Use of Peremptory Challenges
23.27	Motion to Permit Jury Note Taking
23.28	Order Granting Motion to Permit Juror Note Taking
23.29	Response to Motion to Permit Jury Note Taking
23.30	Order Denying Motion to Permit Jury Note Taking
	Trial Procedure
23.41	Motion to Open and Close
23.42	Response to Motion to Open and Close
23.43	Order on Motion to Open and Close
23.44	Motion for Leave to Amend Pleadings - Rule 66
23.45	Response to Motion for Leave to Amend Pleadings - Rule 66
23.46	Order on Motion for Leave to Amend Pleadings - Rule 66
23.47	Motion for Leave to Amend Pleadings - Rule 67
23.48	Response to Motion for Leave to Amend Pleadings - Rule 67
23.49	Order on Motion for Leave to Amend Pleadings - Rule 67
23.50	Motion for Leave to Amend Pleadings - Rule 169
23.51	Order on Motion for Leave to Amend Pleadings - Rule 169
23.52	Formal Bill of Exception
23.53	Bystander's Bill of Exceptions
23.54	Bystander's Affidavit in Support of Bill of Exceptions

	Final Judgments
23.72	Final Judgment for Plaintiff After Jury Trial
23.73	Final Judgment for Plaintiff After Bench Trial
	Findings & Conclusions
23.91	Request for Findings of Fact and Conclusions of Law
23.92	Response to Request for Findings of Fact
23.93	Notice of Past Due Findings of Fact and Conclusions of Law
23.94	Request for Amended or Additional Findings of Fact and Conclusions of Law
	24. Post-Trial Motions
24.01	Motion for New Trial - After Nonjury Trial
24.03	Motion for New Trial - After Default Judgment
24.04	Affidavit in Support of Motion for New Trial - After Default Judgment
24.05	Response to Motion for New Trial
24.07	Order on Motion for New Trial
24.08	Motion for New Trial
24.09	Affidavit in Support of Motion for New Trial
24.10	Order Setting Hearing on Motion for New Trial
24.11	Order Granting Motion for New Trial
24.12	Motion for Mistrial
24.14	Order Granting Motion for Mistrial
24.15	Motion to Reopen Evidence - Rule 270 TRCP
24.17	Order Granting Motion to Reopen
24.18	Motion for Judgment Notwithstanding the Verdict (JNOV)
24.20	Judgment Notwithstanding the Verdict (JNOV)
24.21	Response to Motion for JNOV
24.23	Order Denying Motion for JNOV
24.24	Motion to Disregard Jury Findings
24.26	Judgment to Disregard Jury Findings
24.27	Response to Motion to Disregard Jury Findings
24.29	Order Denying Motion to Disregard Jury Findings
24.30	Motion to Preserve Court Reporter Notes
24.32	Order Granting Motion to Preserve Court Reporter Notes
24.33	Motion to Reconsider Judgment
24.35	Order Granting Motion to Reconsider Judgment
24.36	Motion to Enter Judgment
24.38	Order Granting Motion to Enter Judgment
24.39	Motion to Sign Judgment
24.41	Order Granting Motion to Sign Judgment
24.42	Motion to Reform Judgment
24.44	Order Granting Motion to Reform Judgment
24.45	Motion to Modify Judgment
24.47	Order on Modifying Judgment
24.48	Motion for Remittitur
24.50	Order Granting Motion for Remittitur
24.51	Response to Motion for Remittitur
24.53	Order Denying Motion for Remittitur
24.54	Motion for Judgment Nunc Pro Tunc
24.56	Order Granting Judgment Nunc Pro Tunc

24.57	Response to Motion for Judgment Nunc Pro Tunc
24.59	Order Denying Motion for Judgment Nunc Pro Tunc
24.60	Motion for Withdrawal of Exhibits
24.62	Order on Withdrawal of Exhibits
24.63	Motion for Determination of Lien
24.65	Motion to Set Aside Default Judgment
24.66	Affidavit in Support of Motion to Set Aside Default Judgment
24.67	Order on Motion to Set Aside Default Judgment
24.68	Motion to Set Aside Judgment - Military Service
24.69	Affidavit in Support of Motion to Set Aside Default Judgment - Military Service
24.70	Order on Motion to Set Aside Judgment - Military Service
24.71	Petition for Bill of Review
24.72	Affidavit in Support of Petition for Bill of Review
24.75	Order Granting Petition for Bill of Review
24.76	Defendant's Original Answer to Bill of Review
24.77	Affidavit in Support of Defendant's Original Answer to Bill of Review
	25. Appeal
25.01	Notice of Appeal
25.02	Letter Requesting Court Reporter's Record
25.03	Request for Preparation of Reporter's Record
25.04	Request for Preparation of Clerk's Record
25.05	Letter to Designate Matters in Clerk's Record
25.06	Designation of Matters in Clerk's Record
25.07	Designation of Additional Items to Be Included in Clerk's Record
25.08	Letter to District Clerk Transmitting Written Designation for Filing
	26. Settlement, Releases & Closing
26.01	Settlement Agreement and Release of All Claims
26.02	Settlement and Mutual Release - Non-Litigated
26.03	Settlement and Mutual Release - In Litigation
26.04	General Release
26.05	Detailed Closing and Disbursement Statement
26.07	Client Closing Acknowledgment Letter
26.08	Client Letter - Final Settlement Payment
26.09	Client Letter - Transmitting Costs
26.10	Blank W9 for Client's Tax Information
26.11	Letter - Subrogation Entitlement Denial (Client's Auto Insurance Carrier)
26.12	Motion to Withdraw Funds
26.13	Order Granting the Release of Funds
26.14	Motion Requesting Return of Posted Bond
26.15	Affidavit in Support of Motion Requesting Return of Posted Bond
26.16	Order Granting Return of Posted Bond
26.17	Motion for Return of Bond
26.18	Order Granting Motion for Return of Bond
	27. Sanctions
27.01	Motion for Sanctions - Rule 13 TRCP
27.02	Affidavit in Support of Motion for Sanctions Under Rule 13

27.03	Order Imposing Sanctions Under Rule 13
27.04	Response to Motion for Sanctions Rule 13 TRCP
27.05	Affidavit in Support of Response to Motion for Sanctions Under Rule 13
27.06	Order to Deny Motion for Sanctions Rule 13 TRCP
27.07	Motion for Sanctions for False Certification Rule 191 TRCP
27.08	Affidavit in Support of Motion for Sanctions Under Rule 191
27.09	Order Imposing Sanctions Rule 191 TRCP
27.10	Response to Motion for Sanctions Rule 191 TRCP
27.11	Affidavit in Support of Response to Motion for Sanctions Under Rule 191
27.12	Order to Deny Motion for Sanctions Rule 191 TRCP
27.13	Motion for Sanctions Chapter 10 TCPRC
27.14	Affidavit in Support of Motion for Sanctions Chapter 10 TCPRC
27.15	Order Imposing Sanctions Chapter 10 TCPRC
27.16	Response to Motion for Sanctions Chapter 10 TCPRC
27.17	Affidavit in Support of Response to Motion for Sanctions Chapter 10 TCPRC
27.18	Order to Deny Motion for Sanctions Chapter 10 TCPRC
27.19	Motion for Sanctions for Failure to Serve Rule 21b TRCP
27.20	Affidavit in Support of Motion for Sanctions for Failure to Serve Rule 21b TRCP
27.21	Order Imposing Sanctions 21b TRCP
27.22	Response to Motion for Sanctions Rule 21b TRCP
27.23	Affidavit in Support of Response to Motion for Sanctions Rule 21b TRCP
27.24	Order to Deny Motion for Sanctions Rule 21b TRCP
27.25	Motion for Discovery Sanctions Rule 215 TRCP
27.26	Affidavit in Support of Motion for Discovery Sanctions Rule 215 TRCP
27.27	Order Imposing Sanctions Rule 215 TRCP
27.28	Response to Motion for Discovery Sanctions Rule 215 TRCP
27.29	Affidavit in Support of Response to Motion for Discovery Sanctions Rule 215 TRCP
27.30	Order to Deny Motion for Discovery Sanctions Rule 215 TRCP
27.31	Motion for Contempt
27.32	Affidavit in Support of Motion for Contempt
27.33	Order to Show Cause on Motion for Contempt
27.34	Order Granting Motion for Contempt
27.35	Response to Motion for Contempt - Parties
27.36	Affidavit in Support of Response to Motion for Contempt
27.37	Order Denying Motion for Contempt - Parties
27.38	Response to Motion for Contempt - Nonparty
27.39	Affidavit in Support of Response to Motion for Contempt
27.40	Order Denying Motion for Contempt - Nonparty
27.41	Judgment of Contempt - General
	28. Generic Shells & Utility Forms
28.01	Motion (Shell)
28.02	Order (Shell)
28.03	Verification
28.04	Affidavit
28.05	Unsworn Declaration
28.06	Jurat (Notarized or Unsworn)
28.07	Certificate of Service
28.08	Certificate of Conference

28.09	Notice of In-Person Court Proceeding (Standalone)
28.10	Notice of Remote Court Proceeding (Standalone)
28.11	Notice of Submission (Standalone)
28.12	Objection to Notice of Court Proceeding
28.13	Order on Objection to Notice of Court Proceeding
28.14	Motion for Zoom Hearing
28.15	Order Granting Motion for Zoom Hearing
28.16	Motion to Appear In Court Via Video Conference
28.17	Order on Motion to Appear in Court Via Video Conference
28.18	Certification Regarding Use of Artificial Intelligence
28.19	Affidavit of Identity
28.20	Notice of Party's Current Address
28.21	Certificate of Last Known Address
28.22	Affidavit of Military Status
28.23	Statement of Inability to Afford Payment of Court Costs
28.24	Suggestion of Death
28.25	Bankruptcy Suggestion

Personal Injury – Local Forms

	BELL COUNTY
	Request for Service (Bell)
	Request to Forward Document to Judge (Bell)
	BEXAR COUNTY
	Docket Control Order for Contested Cases - Jury (Bexar)
	Docket Control Order for Contested Cases - Non-Jury (Bexar)
	Motion to Conduct Hearing Via Zoom (Bexar)
	Notice of Setting in Presiding Court (Bexar)
	Notice of Hearing in Monitoring Court (Bexar)
	Notice of In-Person Hearing (Bexar)
	Notice of Zoom Hearing (Bexar)
	Request for Abstract of Judgment and Writ of Execution (Bexar)
	BREWSTER COUNTY
	Certification Regarding Use of Artificial Intelligence (Brewster)
	CALDWELL COUNTY
	E-filing Request for Issuance (Caldwell)
	CALHOUN COUNTY
	Standing Order Regarding Use of Artificial Intelligence (Calhoun)
	COMAL COUNTY
	Motion to Set (Comal)
	CULBERSON COUNTY
	Certification Regarding Use of Artificial Intelligence (Culberson)
	DENTON COUNTY
	Certification Regarding Use of Artificial Intelligence (Denton)
	DEWITT COUNTY
	Standing Order Regarding Use of Artificial Intelligence (DeWitt)
	FORT BEND COUNTY
	Application to Release Funds Deposited for Cash Bond (Fort Bend)
	Subpoena Application (Fort Bend)

	GOLIAD COUNTY
	Standing Order Regarding Use of Artificial Intelligence (Goliad)
	GUADALUPE COUNTY
	Request for Process (Guadalupe)
	HARRIS COUNTY
	Application to Withdraw Minor Funds (Harris)
	HAYS COUNTY
	Request for Post Judgment Writ (Hays)
	HUDSPETH COUNTY
	Certification Regarding Use of Artificial Intelligence (Hudspeth)
	JACK COUNTY
	Standing Order Regarding Use of Full Name of Minor (Jack)
	JACKSON COUNTY
	Standing Order Regarding Use of Artificial Intelligence (Jackson)
	JEFF DAVIS COUNTY
	Certification Regarding Use of Artificial Intelligence (Jeff Davis)
	LUBBOCK COUNTY
	Application for Issuance of Subpoena (Lubbock)
	PRESIDIO COUNTY
	Certification Regarding Use of Artificial Intelligence (Presidio)
	REFUGIO COUNTY
	Standing Order Regarding Use of Artificial Intelligence (Refugio)
	TERRY COUNTY
	Request for Civil Hearing (Terry)
	TRAVIS COUNTY
	Civil District Court Announcement Form (Travis)
	VICTORIA COUNTY
	Standing Order Regarding Use of Artificial Intelligence (Victoria)
	WICHITA COUNTY

	30th Dist Ct - Certification Regarding Use of Artificial Intelligence (Wichita)
	78th Dist Ct - Certification Regarding Use of Artificial Intelligence (Wichita)
	89th Dist Ct - Certification Regarding Use of Artificial Intelligence (Wichita)
	WILLIAMSON COUNTY
	Certification Regarding Use of Artificial Intelligence (Williamson)
	WISE COUNTY
	Standing Order Regarding Use of Full Name of Minor (Wise)
	YOAKUM COUNTY
	Request for Civil Hearing (Yoakum)