



Walk Into Court Already a Hero:

How to Effectively Use Summary Judgments
in Your Practice

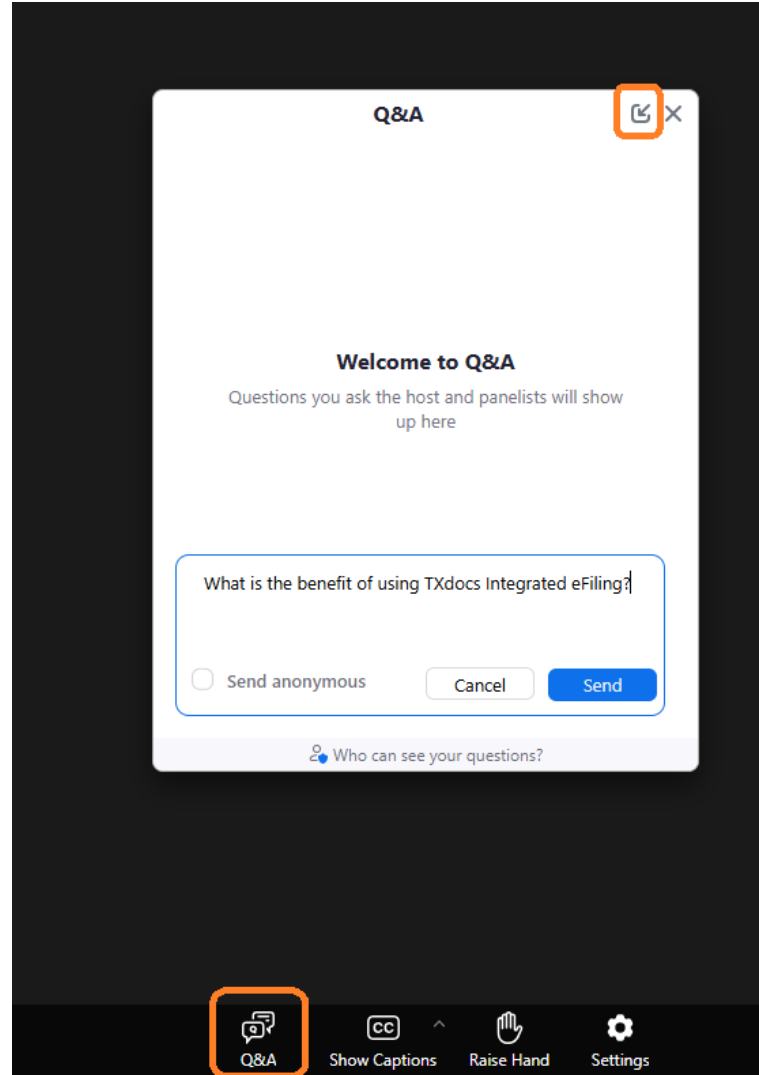
The webinar will start at 12:00pm.

Presented by:
Ron Rodriguez

Welcome

- Questions? Please submit them using the questions box.
- 1 hour of CLE ethics credit – proof of your attendance will be submitted to the bar. Provided that you've given us your bar number.
- Webinar will be recorded - you will receive an email with a link to the recording.
- A short survey will pop up after the webinar ends.

How to ask questions



The screenshot displays the TXDOCS Q&A interface. At the top, a white modal window titled "Q&A" is open. Inside the modal, it says "Welcome to Q&A" and "Questions you ask the host and panelists will show up here". Below this is a text input field containing the question: "What is the benefit of using TXdocs Integrated eFiling?". Under the input field, there is a checkbox labeled "Send anonymous" which is currently unchecked. To the right of the checkbox are two buttons: "Cancel" and "Send". At the bottom of the modal, there is a link that says "Who can see your questions?". The modal is set against a dark background. At the bottom of the screen, there is a navigation bar with four icons: a speech bubble icon labeled "Q&A", a "CC" icon labeled "Show Captions", a hand icon labeled "Raise Hand", and a gear icon labeled "Settings". The "Q&A" icon is highlighted with an orange square.

Q&A

Welcome to Q&A

Questions you ask the host and panelists will show up here

What is the benefit of using TXdocs Integrated eFiling?

☐ Send anonymous

Cancel Send

Who can see your questions?

Q&A Show Captions Raise Hand Settings

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with this webinar.

Introducing Ron Rodriguez



- Board Certified in Personal Injury Trial Law and Civil Appellate Law
- Adjunct professor, The University of Texas School of Law
- Author of the Texas Personal Injury Trial Law Handbook
- 30+ years in civil trial, personal injury, and appellate law
- Founder, Texas Personal Injury Experts, PLLC

Topics



1. New Rule 166a and Summary-Judgment Standards
2. New Deadlines and Timing
3. Response, Evidence, Discovery, and Preservation
4. Practical PI Strategies
5. Key Takeaways
6. Ethics

1. New Rule 166a and Standards

- Traditional, no-evidence, and combined motions
- New Rule 166a
- Burdens and grounds for summary judgment
- Personal Injury practice area: Summary Judgment chapter
- Traditional and no-evidence motion for summary judgment (TXdocs)

2. New Deadlines and Timing

- Response: 21 days after the motion is filed
- Reply: 7 days after the response is filed
- Earliest hearing/submission: 35 days after the motion is filed
- Hearing/submission deadline: generally within 60 days after the motion is filed; up to 90 days when permitted
- Written ruling: within 90 days after hearing/submission
- Response, replies and Deadline Calculator (TXdocs)



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3. Response, Evidence, Discovery, and Preservation

- Summary-judgment evidence and objections
- Adequate time for discovery
- Requests for additional discovery
- Request for Production, Admissions, and Interrogatories as Summary Judgment Evidence
- Replies and prohibition against new grounds
- Preservation of error
- Summary Judgment Objections and Evidence (TXdocs)



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4. Practical PI Strategies

- Plaintiff's MSJ on liability
- Eliminating affirmative defenses
- Using admissions and deposition testimony
- Partial summary judgments to narrow issues before trial
- Strategic impact on mediation and trial
- Using amendments to the pleadings as a strategy

5. Top Takeaways

1. Master the New Rule 166a
Know the revised deadlines, burdens, and procedural requirements.
2. Use MSJs Offensively
Establish liability and eliminate unsupported affirmative defenses.
3. Build the Evidence Early
Use discovery, admissions, depositions, and admissible exhibits.
4. Preserve Error
Make objections, obtain rulings, and protect the appellate record.
5. Think Strategically and Ethically
Narrow trial issues, strengthen settlement leverage, and maintain candor.



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6. Ethics

- Competence concerning new procedural rules
- Candor and accurate presentation of evidence



Case Referrals

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Q&A

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- Thank you for attending. And as always, let us know how we can serve you better!



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Beta version sign-up

- Beta of the new version of TXdocs
 - Early access
 - Help shape the new version of TXdocs by providing feedback
 - Already being used by 100 subscribers
- If you would like early access to this new version, please sign up here:
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- Beta starts on 10/26
- Webinar next Thursday 10/22/2026 at noon
 - <https://bit.ly/txdocs-webinar>