



STATE BAR OF TEXAS

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COMMENTS OF THE APPELLATE SECTION OF THE STATE BAR OF TEXAS ON PROPOSED AMENDMENTS TO THE FEDERAL RULES OF APPELLATE PROCEDURE

Purpose of Proposed Comments

These comments are submitted by the Appellate Section of the State Bar of Texas (the "Section"). The Section wishes to comment on the proposed Amendments to Rules 5, 21, 27, 28.1, 32, 35 and 40 with regard to the proposal to reduce the current word limits in briefs. These comments also address the proposal to apply a conversion rate of 250 words per page on documents being converted from page to word limits. The Section opposes both proposals and believes that a conversion rate of at least 280 words per page is more appropriate and better supported.

Statement of Interest

The Section represents its attorney members, promotes the role of appellate lawyers in Texas, enhances their skills, and improves appellate practice in Texas. It furthers these goals by offering continuing legal education, disseminating materials on matters of interest to members of the Section, and creating opportunities for the exchange of ideas among members of the Section. The Section currently has around 1960 members.¹

Comments as to Length Limits in Proposed Amendments to Rules 5, 21, 27, 28.1, 32, 35 and 40.

The Section opposes the proposed changes that would effectively use a conversion rate of 250 words per page to define the number of words permitted in documents being filed in accordance with the listed rules. The Section advocates that the Federal Rules continue to use a word-to-page conversion factor of at least 280 words per page.

When the Advisory Committee on Appellate Rules voted in April to reduce the words in principal briefs from 14,000 words to 12,500 (while proposing similar changes in other documents), it relied on a 1993 analysis that concluded the average words per page in briefs filed at that time was 250 words per page. The Advisory Committee decided, based on that study, "research indicates that the estimate of 280 words per page is too high" and that "250 words per page is closer to the mark." See Judge Steven M. Colloton, Chair Advisory Committee on Appellate Rules, Memorandum, "Report of Advisory Committee on Appellate Rules" (May 8, 2014, revised June 6, 2014) at 4 ("May 8 Committee Report").

¹ This position is being presented only on behalf of the Appellate Section of the State Bar of Texas. This position should not be construed as representing the position of the Board of Directors, the Executive Committee, or the general membership of the State Bar. The Appellate Section, which is taking this position, is a voluntary section of about 1960 members composed of lawyers practicing in a specified area of law. This position is taken as a result of a unanimous vote of the council of the Appellate Section, which is the governing body of that section. No approval or disapproval of the general membership of this Section has been obtained.



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To test the Committee's premise, the Section has conducted its own study of briefs filed in the United States Courts of Appeals prior to the 1998 rule change that replaced page limits in briefs with word limits. The results of this study demonstrate that the average words per page in these briefs was 294 words per page—exceeding the 250 words per page the Committee now advocates and even the 280 words per page actually used at the time of the 1998 rule amendments. That study (the “2015 Study”) is attached as Appendix A.

Previously, members of the Section had conducted a similar, but more thorough study in 2012, when the Texas Rules of Appellate Procedure were being amended to convert page limits to word limits. That study examined 63 briefs in which the Texas Rules of Appellate Procedure created very short page limits of either 8 or 15 pages. The results of that study were that the documents averaged 291 words per page. If the single highest and single lowest numbers were eliminated, the average was 293 words per page. That study (the “2012 Study”) is attached as Appendix B. At the time of the 2012 conversion from page to word limits, the Texas Supreme Court adopted a conversion ratio of 300 words per page.

Both these studies are described in greater detail below. Both studies support word-per-page conversion ratios between 290 and 300 words per page. Neither supports a word-per-page conversion ratio of 250 words per page.

A. Analysis of the 2015 Study

The Federal Rules of Appellate Procedure were amended in 1998 to change the page limits on principal briefs and reply briefs to word limits. The 2015 study had to rely on locating attorneys who had retained hard copies of their briefs for approximately seventeen years. In that time, most law firm had changed their word processing and operating system programs so that most attorneys no longer had access to electronic versions of briefs from that era. Because of the difficulty in locating briefs that were at least seventeen years old, the sampling ended up being fairly limited. Nevertheless, the Section was able to locate 15 briefs that predated the 1998 rule change.

The original object of the study was to gather briefs that were 50 pages in length (or more) because it was thought those briefs would probably reflect the attorneys' attempt to put as many words on the page as possible. That task proved too difficult, given the passage of time and the fact that attorneys apparently used the full 50 pages only if it was absolutely necessary. As a result, around 60% of the briefs were nearly 50 pages or longer. The rest varied between 39.81 pages and 48.85.²

The study demonstrates no briefs had as few words per page as 250—the number the

² As noted in the study itself, when the last page was a partial page, the number of lines on the last page were counted and divided by 26, with the number 26 representing the number of lines on a typical double-spaced page. The incomplete last page, therefore, is expressed as a decimal. The calculation of the number of words per page also relied on the number of pages being expressed with the decimal. So, for example, one brief had 13,129 words and 39.54 pages. 13,129 was divided by 39.54. The result was 332.04, which was stated as “332” in the study as the number of words per page. The numbers of words per page were expressed as whole numbers using normal rounding principles.



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1993 study found was the average. Instead, the fewest number of words per page was 263. The maximum number of words per page was 336. If the words per page are averaged over the 15 briefs, the average equals 294 words per page. That number exceeds the 280 words per page adopted in the 1998 amendments to the Federal Rules of Appellate Procedure, and it far exceeds the 250 words per page being suggested in the current proposed amendments.

B. Analysis of the 2012 Study

The 2012 study was compiled by Marcy Greer, currently at the law firm of Alexander Dubose Jefferson & Townsend. Ms. Greer was at Fulbright & Jaworski when the study was conducted. In 2012, the Texas Supreme Court was considering adopting word limits to replace the page limits that had previously been in place. The Texas Supreme Court was considering a word-per-page conversion of 300 words per page. Thus, briefs previously subject to a 50 page limit would be limited to 15,000 words.

The object of the 2012 study was to examine the number of words per page allowed in the shorter briefs filed with the Texas Supreme Court. The Texas Rules of Appellate Procedure create a multi-stage process for obtaining Texas Supreme Court review, somewhat akin to the petition for certiorari process in the United States Supreme Court. The initial filing in the Texas Supreme Court is a petition for review. The petition for review and response were limited to 15 pages. The reply brief was limited to 8 pages. Mandamus proceedings to the Texas Supreme Court were similarly limited in their first sets of filings. Only if the Texas Supreme Court called for further briefing would the parties be allowed to file their full briefs. Those full briefs were 50 pages for the petitioner's and respondent's briefs and 25 pages for the reply brief, all using 13-point font.

The 2012 study included 63 briefs and showed the average words per page was 291. If the single highest and lowest numbers were excluded (385 words/pg. and 90 words/pg.) the average was 293 words per page. Twenty-eight of the 63 briefs had 300 words or more per page, while only 4 of the 63 briefs had 250 words or fewer per page.

As with the 2015 study, the 2012 study supports a word-to-page ratio of 300 words per page. It certainly supports a ratio of at least 280 words per page. It does not support a ratio of 250 words per page.

C. Conversion of Pages to Word Count – Rules 5, 21, 27, 35, 40

The Section does not oppose the proposed amendments to these rules insofar as they propose to convert the current page limitations to word limitations. However, as with the current rules for briefs—Rules 28.1 and 32—the conversion factor should be based on at least 280 words per page. Although the Section has not conducted a comprehensive study on these types of motions, I recently assisted in filing a response to a motion to stay injunction in the Fifth Circuit in Cause No. 14-41384, *Retractable Technologies, Inc. et al. v. Becton Dickinson and Company*. That response was a full 20 pages long (in 14-point font) and was 5,808 words total. That calculates out to 290 words per page. Although this is a single example, it serves to show that a conversion of at least 280 words per page remains appropriate for the amendments to be made



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to Rules 5, 21, 27, 35, and 40.

D. Overall Comments Regarding Proposed Amendments on Length Limits

The Section joins the sentiments of the other organizations filing comments that the current word limits should not be reduced. Cases now tend to be complicated and can involve very high damages awards. In March 2014, the National Law Journal compiled a list of the top 100 verdicts in 2013. See National Law Journal, *Top 100 Verdicts of 2013* (March 24, 2014), <http://www.nationallawjournal.com/id=1202647966490/Top-100-Verdicts-of-2013?slreturn=20150026124728>. That National Law Journal report reveals that the top 100 verdicts of 2013 ranged from \$20 million to more than \$1.2 billion. Nearly a quarter of the cases on that list (23) were in federal district courts throughout the nation. Many were intellectual property cases; some were antitrust; others ranged from breach of contract to employment issues.

This is just an example of the types of cases that are being appealed now. Attorneys should not be forced to go through the difficult procedure that exists in some courts to file longer briefs. For example, Fifth Circuit Local Rule 32.4 provides:

32.4 Motions for Extra-Length Briefs. A motion to file a brief in excess of the page length or word-volume limitations must be filed at least 10 days in advance of the brief's due date. The court looks upon such motions with great disfavor and will grant them only for extraordinary and compelling reasons. If a motion to file an extra-length brief is submitted, a draft copy of the brief must be submitted with the motion.

Attorneys should not have to undergo a process like this when there is nothing wrong with the current limitations. In fact, the May 8 Committee Report provides no other reason for altering the type volume limitations other than the assumed-correctness of the 1993 analysis attached to that report. As shown in these comments, the 1993 analysis does not accurately reflect the word count per page in all of the briefs being filed under the pre-1998 Rules of Appellate Procedure.

Conclusion

The Section recommends retaining at least the current word count for briefs in Rules 28.1 and 32 and further recommends that pages be converted to word counts for Rules 5, 21, 27, 35, and 40 assuming at least a 280 word-per-page conversion ratio.

Sincerely,

/s/ Cynthia K. Timms

Cynthia K. Timms
Chair, State Bar of Texas Appellate Section

Appendix A

Style	Cause No.	Nature of Brief	Page Count¹	Word Count	Words/ Page	Attorneys of Record	Law Firms
In re Duval County Ranch Co./ Manges v. Atlas	95-40582 95-40584 5th Cir.	Appellee	39.81	11,374	286	Harry M. Reasoner, H. Ronald Welsh, Marie R. Yeats; Evelyn H. Biery	Vinson & Elkins L.L.P.; Fulbright & Jaworski L.L.P.
Arleth v. FMP Operating Co.	92-3313 5th Cir.	Appellee/ Cross-Appellant	44.54	14,980	336	Marie R. Yeats, J. Harrell Feldt; Dermot S. McGlinchey, Craig L. Caesar	Vinson & Elkins L.L.P.; McGlinchey, Stafford, Lang
Crowe v. Smith	96-30851 5th Cir.	Appellant	39.54	13,129	332	Harry M. Reasoner, Marie R. Yeats; Emmett C. Sole; Gary V. Dixon; William E. O'Brian, Jr.	Vinson & Elkins L.L.P.; Stockwell, Sievert, Viccellio, Clements & Shaddock; Ross, Dixon & Masback, L.L.P.
General Accident Ins. Co. v. Enserch Corp.	90-1649 5th Cir.	Appellant	59.19	19,027	321	Harry M. Reasoner, David H. Brown, Marie R. Yeats; Robin P. Hartmann, Werner A. Powers, Noel M. Hensley	Vinson & Elkins; Haynes & Boone
Mitchell Energy Corp. v. Samson Resources Co.	95-40204 5th Cir.	Appellants	49.92	13,999	280	Morris Harrell, Joe E. Staley, Jr., Michael V. Powell; Luther H. Soules, III	Locke Purnell Rain Harrell; Soules & Wallace

¹ This Study assumed 26 lines per page. Decimals indicate the last page is a partial one. The decimal was calculated by dividing the number of lines by 26.

Style	Cause No.	Nature of Brief	Page Count¹	Word Count	Words/ Page	Attorneys of Record	Law Firms
The Scottish Heritable Trust, PLC v. Peat Marwick Main & Co.	94-10952 5th Cir.	Appellants	49.92	14,003	281	Morris Harrell, Timothy W. Mountz, Cynthia Keely Timms	Locke Purnell Rain Harrell
The Scottish Heritable Trust, PLC v. Peat Marwick Main & Co.	94-10952 5th Cir.	Cross- Appellees/ Response	50	14,535	291	Morris Harrell, Timothy W. Mountz, Cynthia Keely Timms	Locke Purnell Rain Harrell
The Scottish Heritable Trust, PLC v. Peat Marwick Main & Co.	94-10952 5th Cir.	Appellee/ Cross- Appellant	50	15,322	306	Dale A. Cooter, James E. Tompert	Cooter, Mangold, Tompert & Chapman P.C.
Tarrant Distributors, Inc. v. Heublein, Inc.	96-21156 5th Cir.	Appellant	37.08	11,772	317	Alan Wright, LaDawn H. Conway	Haynes and Boone, L.L.P.
Smith v. Smith	96-10999 5th Cir.	Appellant	51.58	13,616	264	Sharon N. Freytag; Todd H. Tinker	Haynes and Boone, L.L.P.; Law Office of Todd H. Tinker, P.C.
Marchman v. NationsBank of Texas, N.A.	95-11209 5th Cir.	Appellee/ Cross- Appellant	41.5	13,169	317	Benjamin H. Davidson II; William C. Madison, Eliza Stewart	Haynes and Boone, L.L.P.; Madison, Harbour & Mroz, P.A.
Weber v. Trinity Meadows Raceway, Inc.	96-10916 5th Cir.	Appellees	49.54	13,505	273	Frederick W. Addison, III; Elizabeth E. Mack; Terry Gardner	Locke Purnell Rain Harrell; Gardner & Aldrich
SportsBand Network Recovery Fund, Inc. v. PGA Tour, Inc.	96-11164 5th Cir.	Appellants	49.42	12,977	263	Frederick W. Addison, III; Elizabeth E. Mack	Locke Purnell Rain Harrell
BancAmerica Commercial Corp. v. Trinity Indus., Inc.	95-3385 10th Cir.	Appellants	49.62	13,452	271	Frederick W. Addison, III; Elizabeth E. Mack	Locke Purnell Rain Harrell

Style	Cause No.	Nature of Brief	Page Count¹	Word Count	Words/ Page	Attorneys of Record	Law Firms
BancAmerica Comm. Corp. v. Trinity Indus., Inc.	95-3385 10th Cir.	Cross Appellee Response and Reply	48.85	13,139	269	Frederick W. Addison, III; Elizabeth E. Mack	Locke Purnell Rain Harrell
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Appendix B

Style	Cause No.	Nature of Document	Page Count	Word Count	Words/ Page	Attorneys of Record (Not Necessarily Complete)	Law Firms (Not Necessarily Complete)
Carol Ernst v. Merck & Co., Inc.	10-0006	Response to Petition	15	4,923	328	Katherine Mackillop	Fulbright & Jaworski LLP
Paradigm Geophysical Ltd. v. Geophysical Micro Computer Applications (Int'l) Ltd.	01-1201	Petition for Review	15	4,855	324	Ben Taylor	Fulbright & Jaworski LLP
Paradigm Geophysical Ltd. v. Geophysical Micro Computer Applications (Int'l) Ltd.	01-1201	Reply Petition for Review	2	179	90	Ben Taylor	Fulbright & Jaworski LLP
Paradigm Geophysical Ltd. v. Geophysical Micro Computer Applications (Int'l) Ltd.	01-1201	Motion for Rehearing	7	2,263	323	Ben Taylor	Fulbright & Jaworski LLP
Zachary Constr. Corp. v. Texas A&M Univ.	07-1050	Petition for Review	15	4,567	304	Ben Taylor	Fulbright & Jaworski LLP
Zachary Constr. Corp. v. Texas A&M Univ.	07-1050	Reply Petition for Review	8	2,694	337	Ben Taylor	Fulbright & Jaworski LLP
Zachary Constr. Corp. v. Texas A&M Univ.	07-1050	Motion for Rehearing	15	4,128	275	Ben Taylor	Fulbright & Jaworski LLP
Francisco Boada v. Tenet Hosps. Ltd.	10-0172	Response to Petition	15	4,131	275	Marcy Greer	Fulbright & Jaworski LLP
Farmers Group, Inc. v. Jan Lubin	05-0169	Petition for Review	15	4,722	315	Marcy Greer	Fulbright & Jaworski LLP
Farmers Group, Inc. v. Jan Lubin	05-0169	Reply Petition for Review	8	2,227	278	Marcy Greer	Fulbright & Jaworski LLP
Farmers Group, Inc. v. Sandra Geter	07-0707	Petition for Review	15	4,369	291	Marcy Greer/ Katherine Mackillop	Fulbright & Jaworski LLP
Farmers Group, Inc. v. Sandra Geter	07-0707	Reply Petition for Review	8	2,540	318	Marcy Greer/ Katherine Mackillop	Fulbright & Jaworski LLP
Universal Health Services, Inc. v. Renaissance Women's Group, P.A.	02-0193	Petition for Review	15	4,494	300	Douglas Alexander	Fulbright & Jaworski LLP/Scott Douglas McConnico
Universal Health Services, Inc. v. Renaissance Women's Group, P.A.	02-0193	Reply Petition for Review	7	2,124	303	Marcy Greer/Doug Alexander	Fulbright & Jaworski LLP/Scott Douglas McConnico
Power Resource Group, Inc. v. Public Utility Commission of Texas	02-0167	Response to Petition	15	4,674	312	Marcy Greer	Fulbright & Jaworski LLP
In re Allied Chemical Corp.	09-0106	Mandamus Petition	15	3,909	261	Rosemarie Kanusky	Fulbright & Jaworski LLP
In re Allied Chemical Corp.	09-0106	Mandamus Reply	8	2,170	271	Rosemarie Kanusky	Fulbright & Jaworski LLP
In re Emeritus Corp.	05-0726	Mandamus Petition	15	3,926	262	Rosemarie Kanusky	Fulbright & Jaworski LLP
In re Emeritus Corp.	05-0726	Mandamus Reply	8	2,048	256	Rosemarie Kanusky	Fulbright & Jaworski LLP
Trammell Crow Central Texas Ltd. v. Maria Gutierrez	07-0091	Petition for Review	18	3,906	217	Rosemarie Kanusky	Fulbright & Jaworski LLP
Trammell Crow Central Texas Ltd. v. Maria Gutierrez	07-0091	Reply Petition for Review	9	1,955	217	Rosemarie Kanusky	Fulbright & Jaworski LLP
In re Allied Chemical Corp.	09-0264	Mandamus Petition	15	4,008	267	Rosemarie Kanusky	Fulbright & Jaworski LLP
In re Allied Chemical Corp.	09-0264	Mandamus Reply	8	2,200	275	Rosemarie Kanusky	Fulbright & Jaworski LLP
The City of Round Rock Texas and Round Rock Fire Chief Larry Hodge v. Jaime Rodriguez and Round Rock Fire Fighters Ass'n	10-0666	Petition for Review	15	4,823	322	Doug Alexander	Alexander Dubose Townsend
Lou Ann Smith et al. v. Black+Vernooy Architects et al.	11-0731	Petition for Review	15	4,229	282	Doug Alexander	Alexander Dubose Townsend
Edwards Aquifer Auth. v. Burrell Day	08-0964	Motion for Rehearing	15	5,478	365	Pam Baron/Drew Miller	Pam Baron/Kemp Smith Pam Baron/McElroy Sullivan & Miller
Wagner Oil Co. v. Vaquillas Ranch Co.	09-0399	Petition for Review	15	4,848	323	Pam Baron/Michael McElroy	Pam Baron/McElroy Sullivan & Miller
Wagner Oil Co. v. Vaquillas Ranch Co.	09-0399	Reply Petition for Review	8	2,520	315	Pam Baron/Michael McElroy	Pam Baron/McElroy Sullivan & Miller
Parsons v. Turley	11-0338	Petition for Review	18	4,431	246	Kurt Kuhn	Kurt Kuhn PLLC

Parsons v. Turley	11-0338	Reply Petition for Review	11	2,288	208 Kurt Kuhn	Kurt Kuhn PLLC
TracFone Wireless, Inc.v. Commission on State Emergency Communications	11-0473	Petition for Review	15	4,156	277 Reagan Simpson/Chris Ward	Yetter Coleman/Stahl Bernal & Davis
TracFone Wireless, Inc.v. Commission on State Emergency Communications	11-0473	Reply Petition for Review	8	2,538	317 Reagan Simpson/Chris Ward	Yetter Coleman/Stahl Bernal & Davis
City of Houston v. Hotels.com, L.P.	12-0066	Response to Petition	15	5,777	385 Stagner/Kelly Stewart	Kelly Hart/Jones Day
Carolee Oakland v. Travelocity.com Inc.	09-0811	Response to Petition	14	3,957	283 Montgomery	Kelly Hart
In re Bank of America, N.A.	12-0178	Mandamus Petition	15	4,624	308 Karen Precella	Haynes and Boone, LLP
In re Bank of America, N.A.	12-0178	Mandamus Reply	8	2,425	303 Karen Precella	Haynes and Boone, LLP
Larry T. Long v. RIM Operating, Inc.	11-0485	Petition for Review	15	4,188	279 Franklin Honea/Skip Watson & Mike Hatchell	Law Offices of Franklin Honea/Locke Lord Bissell & Liddell LLP
Larry T. Long v. RIM Operating, Inc.	11-0485	Reply Petition for Review	8	2,330	291 Franklin Honea/Skip Watson & Mike Hatchell	Law Offices of Franklin Honea/Locke Lord Bissell & Liddell LLP
Homer Merriman v. XTO Energy Inc.	11-0494	Response to Petition	15	4,185	279 Skip Watson & Mike Hatchell	Locke Lord Bissell & Liddell LLP
Homer Merriman v. XTO Energy Inc.	11-0494	Response to Motion for Rehearing	12	3,354	280 Skip Watson & Mike Hatchell	Locke Lord Bissell & Liddell LLP
Vinson Materials, Ltd. v. XTO Energy Inc.	11-0035	Response to Petition	15	4,445	296 David Skeels/Skip Watson & Mike Hatchell	Friedman, Suder & Cooke/Locke Lord Bissell & Liddell LLP
Cameron International Corporation v. Vetco Gray Inc.	09-0397	Petition for Review	12	3,527	294 Russell Post & David Gunn	Beck, Redden & Sechrest, L.L.P.
Cameron International Corporation v. Vetco Gray Inc.	09-0397	Reply Petition for Review	8	2,418	302 Russell Post & David Gunn	Beck, Redden & Sechrest, L.L.P.
Dynergy, Inc. v. Terry W. Yates	11-0541	Petition for Review	15	4,889	326 Russell Post/Bruce Oakley	Beck, Redden & Sechrest, L.L.P./Hogan Lovells L.L.P.
Dynergy, Inc. v. Terry W. Yates	11-0541	Response on Conditional Cross-Petition	15	4,743	316 Russell Post/Bruce Oakley	Beck, Redden & Sechrest, L.L.P./Hogan Lovells L.L.P.
Dynergy, Inc. v. Terry W. Yates	11-0541	Reply Petition for Review	8	2,575	322 Russell Post/Bruce Oakley	Beck, Redden & Sechrest, L.L.P./Hogan Lovells L.L.P.
James B. Harris v. Gordon R. Cooper, II	11-0060	Response to Petition	11	3173	288 Russell Post & Erin Huber	Beck, Redden & Sechrest, L.L.P.
In re Laura Russell and Brenda Volk	10-0485	Mandamus Petition	10	2,865	287 Russell Post & Douglas Pritchett	Beck, Redden & Sechrest, L.L.P.
In re Laura Russell and Brenda Volk	10-0485	Mandamus Reply	5	1,508	302 Russell Post & Douglas Pritchett	Beck, Redden & Sechrest, L.L.P.
Regal Finance Company, Ltd. v. TexStar Motors, Inc.	08-0148	Petition for Review	15	4,687	312 David Beck, Russell Post & David Gunn	Beck, Redden & Sechrest, L.L.P.
In re Stephanie Lee	11-073	Mandamus	12	3,166	264 Scott Rothenberg	Law Offices of Scott Rothenberg
Spir Star AG v. Louis Kimich	07-0340	Response to Petition	15	4,244	283 Scott Rothenberg	Law Offices of Scott Rothenberg
U-Haul International, Inc. v. Talmadge Waldrip	10-0781	Petition for Review	15	4,630	309 David Keltner/Thomas Leatherbury & Lisa Hobbs	Kelly Hart/Vinson & Elkins LLP

U-Haul International, Inc. v. Talmadge Waldrip	10-0781	Petition for Review	8	2,745	343 David Keltner/Thomas Leatherbury & Lisa Hobbs	Kelly Hart/Vinson & Elkins LLP
In re Petrohawk Energy Corporation	10-0528	Mandamus Petition	15	4,746	316 J. Robert Beatty/Marie Yeates & Gwen Samora & Lisa Hobbs	Locke Lord Bissell & Liddell LLP/Vinson & Elkins LLP
In re Petrohawk Energy Corporation	10-0528	Mandamus Reply	8	2,743	343 J. Robert Beatty/Marie Yeates & Gwen Samora & Lisa Hobbs	Locke Lord Bissell & Liddell LLP/Vinson & Elkins LLP
Thomas Petroleum, Inc. v. Gregory Morris	11-0548	Response to Petition	12	2,780	232 Rhonda Wills/Richard Hogan & Jennifer Hogan	Wills Law Firm/Hogan & Hogan
In re QualitySafety Systems Company	10-0984	Mandamus Petition	15	4,340	289 Jack Little/Richard Hogan & Jennifer Hogan	Weinstein Tippetts & Little/Hogan & Hogan
In re Valero Energy Corporation	11-0138	Mandamus Petition	15	4,400	293 Steven Rech/Richard Hogan & Jennifer Hogan	Schwartz, Junell, Greenberg & Oathout LLP/Hogan & Hogan
Enterprise Products Partners LP v. Catherine Mitchell	11-0366	Response to Petition	15	4,296	286 Nick Nichols/Richard Hogan & Jennifer Hogan	Abraham, Watkins, Nichols, Sorrells, Agosto & Friend/Hogan & Hogan
Conex International Corporation v. Fluor Enterprises, Inc.	09-0199	Petition for Review	15	4,439	296 Randal Cashiola/Richard Hogan & Jennifer Hogan	Chambers, Templeton, Cashiola & Thomas/Hogan & Hogan
Microtherm, Inc. v. Dana Corporation	10-0126	Conditional Petition for Review	15	4,253	284 Thomas Phillips/Richard Hogan & Jennifer Hogan	Baker Botts LLP/Hogan & Hogan
Sanguine Gas Exploration LLC v. Expro Americas, LLC	11-0974	Petition for Review	15	4,275	285 James Tompkins/Jennifer Hogan & Richard Hogan	Galloway, Johnson, Tompkins, Burr & Smith/Hogan & Hogan

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