The Business Court of Texas,
[__] Division

[Plaintiff(s)],	§	
Plaintiff(s),	§	
	§	
v.	§	Cause No. [_____]
[Defendant(s)],	§	
	§	
Defendant(s).	§	

Joint Advisory on Early Legal Issues

Instructions: For each numbered paragraph below, please fill in the first bracket with a legal issue and the second bracket with the identity of the party or parties who suggest early resolution of the issue. Identify legal issues as succinctly and neutrally as possible, without argument. For example: "whether the purchase contract is valid and enforceable (all parties)," "whether the directors owed Company X a duty of loyalty (defendants)," "which party bears the burden of proof on plaintiff's claim for breach of fiduciary duty (plaintiff)." Include as many or as few numbered paragraphs as needed.[1] Before filing, please add the appropriate signature blocks and certificate(s), and delete these instructions (in red).

The parties suggest that the following legal issues should be decided by the Court and can be resolved early in the case to narrow the issues, facilitate settlement, or otherwise increase efficiency or expedite resolution of the case:

1. [identify legal issue] ([all parties/plaintiff/defendant(s)])

[1] Failure to include an issue here will not result in waiver or prevent future requests for relief, and inclusion of an issue here does not independently preserve the issue or constitute a motion for judgment on the issue. The parties will have the opportunity to fully brief any issues before they are decided.

2. [identify legal issue] ([all parties/plaintiff/defendant(s)])

3. [identify legal issue] ([all parties/plaintiff/defendant(s)])

4. [identify legal issue] ([all parties/plaintiff/defendant(s)])