

TRIAL

J.J. Knauff represented an oilfield service company who was sued for in excess of \$63,000,000 and was able to obtain a favorable outcome for the client after a ten-day trial. *See Heritage Standard Corporation v. Apollo Perforators, Inc.*, Case No. 10-36484-hdh-11; Adversary No. 10-03417; United States Bankruptcy Court, Northern District of Texas.

J.J. Knauff represented a trucking company at a five-day personal injury trial in Odessa, Texas. The plaintiff sought in excess of \$1,600,000 in damages; however, J.J. was able to obtain a defense verdict in December 2011. *See Gilman Treviso v. One Source Industrial, Inc.*; Cause No. B-128,215; 161st Judicial District, Ector County, Texas.

J.J. Knauff represented an operator in this personal injury suit. J.J. was able to utilize the Fort Worth Local Rules to strike testimony of the plaintiff's proposed witnesses, which resulted in the plaintiff accepting less money at trial than was offered at mediation. *See Johnny Trayler v. Rife Energy Operating, Inc.*, Cause No. 236-221198-06, 236th Judicial District Court, Tarrant County, Texas.

APPEALS

On November 15, 2012, in a case of first impression, the Waco Court of Appeals held a pass-through indemnity clause was valid thereby affirming the trial court's grant of summary judgment. *See Tuttle & Tuttle Trucking, Inc. v. EOG Resources, Inc.*, 391 S.W.3d 240 (Tex. App.—Waco 2012, pet. filed). J.J. Knauff researched and drafted the appellate briefing in this matter.

On December 21, 2012, in another case of first impression, the Dallas Court of Appeals issued a holding regarding the potential preemption of claims made by undocumented aliens and set forth elements for the admissibility of a plaintiff's immigration status at trial. *See Grocers Supply, Inc., et al. v. Jose Luis Cabello, et al.*, 390 S.W.3d 707 (Tex. App.—Dallas 2012, no pet.) (stating proponent of evidence must show the undocumented alien was in danger of immediate deportation and must establish the effect, if any, such deportation might have on future earning capacity). J.J. Knauff researched and drafted the appellate briefing in this matter and presented the oral argument before the court.

On May 17, 2012, the Fort Worth Court of Appeals upheld a traditional summary judgment in favor of Denbury Resources, Inc. in a multi-party lawsuit. *See Bell v. Denbury Resources, Inc., et al.*, 2012 WL 1739913 (Tex. App.—Fort Worth May 17, 2012, no pet.). J.J. Knauff researched and drafted the appellate briefing in this matter.

On February 9, 2011, the Waco Court of Appeals held the trial court abused its discretion and granted a petition for mandamus in favor of EOG Resources, Inc. regarding a discovery dispute. *See In re EOG Resources, Inc.*, 2011 WL 455280 (Tex. App.—Waco Feb. 9, 2011) (orig. proceeding). J.J. Knauff researched and drafted the appellate briefing in this matter.