JW | AviationFlyer

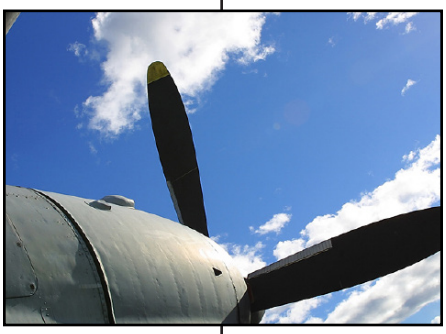
Spring 2013 An Aviation Law Newsletter www.jw.com

In This Issue

The United States Supreme Court's Competing Guidance Regarding Personal Jurisdiction over Foreign Manufacturers

by Andrew D. Graham

The ability of U.S. courts to assert personal jurisdiction over foreign defendants is a topic of significant interest for many businesses. The United States Supreme Court has recently granted review of two personal-jurisdiction cases, *DaimlerChrysler AG v. Bauman*, No. 11-965 (cert. granted Apr. 22, 2013) and *Walden v. Fiore*, No. 12-574 (cert. granted Mar. 4, 2013), which could potentially impact a forum state's ability to assert personal jurisdiction over non-state defendants, including foreign manufacturers. In light of this, it is helpful to consider the current guidance given by the Court regarding personal jurisdiction over foreign manufacturers.



Any discussion of the subject necessarily begins with the Supreme Court's opinion in *Asahi Metal Industry Co. v. Superior Court of California*, 480 U.S. 102 (1987). In *Asahi*, a divided Supreme Court provided competing guidance regarding personal jurisdiction over foreign manufacturers. On the one hand, Justice Brennan, joined by three other Justices, concluded that the placement of a product into the "stream of commerce" was enough to impose personal jurisdiction over a foreign manufacturer. On the other, Justice O'Connor, joined by three other Justices, concluded that a manufacturer must do more than simply place its product into the "stream of commerce." That is, in order to have adequate "minimum contacts" to impose personal jurisdiction, a manufacturer must engage in conduct "purposefully directed toward the forum state." Since *Asahi*, courts have struggled to reconcile these competing opinions. *See, e.g., Spir Star AG v. Kimich*, 310 S.W.3d 868, 873 (Tex. 2010) (observing that Texas precedent "generally follows Justice O'Connor's plurality opinion in *Asahi*, which requires some additional conduct—beyond merely placing the product in the stream of commerce—that indicates an intent or purpose to serve the market in the forum State.") (internal quotations omitted).

In *J. McIntyre Machinery, Ltd. v. Nicastro* (No. 09-1343, June 27, 2011), the Supreme Court had another opportunity to provide guidance on the issue. But once again, the Court failed to reach a majority. *Nicastro*, like *Asahi*, involved a products-liability action against a foreign manufacturer. Robert Nicastro seriously injured his hand in New Jersey while using a metal-shearing machine J. McIntyre Machinery, Ltd. ("J. McIntyre") manufactured in England. Nicastro then sued J. McIntyre in New Jersey state court, and J. McIntyre challenged personal jurisdiction. J.

Continued on Page 5

JW | JACKSON WALKER L.L.P.

Aviation Flyer™ is published periodically by the law firm of Jackson Walker L.L.P. to inform readers of recent developments in aviation law and related areas. It is not intended nor should it be used as a substitute for legal advice or opinion, which can be rendered only when related to specific fact situations.

More information regarding Jackson Walker may be found on the Internet at www.jw.com. © 2013 Jackson Walker L.L.P.

Recent French Appeals Court Decision in Concorde Crash Step Forward Towards Decriminalization of Aviation Accidents

by Seth Johnson

On November 29, 2012, a French appeals court overturned manslaughter convictions against Continental Airlines and a Continental mechanic for the crash of an Air France Concorde in 2000 that killed 113 people. In the original 2010 ruling, a French court held that the mechanic fitted the wrong metal strip on a Continental DC-10, which ultimately fell off on the runway and caused the Concorde accident. The appellate court, in overturning the involuntary manslaughter convictions against the airline and mechanic, held their mistakes did not make them criminally responsible for the accident deaths.

The ruling came as a surprise to many in the aviation community due to the growing trend of criminal prosecutions following aviation accidents. For example, according to one study, 27 aviation accidents were criminally investigated in the 43-year period of 1956-1999, compared to 28 investigations in the 9-year span of 2000-2009.

The Flight Safety Foundation praised the decision, stating "We're very pleased that courts are recognizing that professional human error does not amount to criminal conduct, even where it can lead to catastrophic consequences." The juxtaposition of this sentiment with the disappointment in the ruling expressed by crash victims' families highlights why the criminalization of aviation accidents continues to create tension between those in the aviation industry and those involved in judicial systems, as well as sometimes the general public.

While the standards for culpability may vary widely, the methodology and approach of any legal system is to determine fault and liability, and then apportion blame. To this end, participants in the judicial system can view an accident investigation with the somewhat myopic purpose of assigning responsibility in the criminal sense. Members of the aviation industry worry that in the context of aviation accidents this leads to the criminalization of error – the conflation of ordinary negligence, or in this case the mistakes inherent in any system containing human components, with a criminal state of mind.

On the other hand, technical investigations conducted by safety agencies after an accident focus on determining the reasons that led to the accident and proposing corrective safety measures. These investigations are conducted with the end goal of protecting the public in the future by improvement in aviation safety and the prevention of additional accidents.

Critics of the trend towards the criminalization of aviation accidents argue that this trend will have a detrimental impact on aviation safety. As the NTSB has observed, "the potential for losing the cooperation of individuals who feel they may face criminal accusations is very real." In addition to losing the voluntary cooperation of witnesses who "lawyer up and shut up" after being involved in an accident, the potential exists for criminal investigations to misuse safety report conclusions to establish criminal liability. Furthermore, safety organizations around the globe have stated that concurrent criminal prosecutions have threatened their investigative efficiency by delaying and sometimes preventing components of the safety investigations.

Critics also argue that the criminalization of aviation accidents does not serve one of the major purposes of criminal punishment – deterrence. The requisite criminal law mens rea or mental state – the intent to commit the crime – does not exist in an accident, which is by definition unintentional. This is of course a bit of an oversimplification, as criminal systems often punish reckless conduct, i.e. drunk driving, and strict liability crimes, but the above statement holds true for almost all aviation accidents (certainly no one is advocating drunk flying should not be prosecuted). Where the accident is the result of a pure mistake, post-accident criminalization will never meaningfully serve the interests of deterrence.

Flight crews provide a good illustration of this. The primary deterrent for pilots against negligent conduct is the simple fact that on every flight they are equally as likely to be the victims of their own negligence as any other individual (not to mention the ample financial and professional consequences that can accompany an accident).

For the reasons discussed, the decision by the French court of appeals to overturn the Continental manslaughter verdicts can be seen as a step forward for aviation safety. However, the unfolding of recent events in another high profile aviation crash illustrates not only how disparate the results can be when countries attempt to criminalize accidents, but also some of the positive steps the aviation community can take to address this issue.

On October 15, 2012, a Brazilian court upheld the conviction of two U.S. pilots for their role in the 2006 Gol/Legacy mid-air collision. Federal prosecutors and victims' families groups appealed the initial ruling and are expected to further appeal this ruling, arguing that the pilots must serve time in prison because of the number of lives lost in the crash (neither ruling required the pilots to serve their initial four-year prison sentence).

In response, Brazilian safety experts have put on a five-day course, "The Role of the Judiciary in Flight Safety," to inform the nation's judges and prosecutors of the pitfalls of criminalizing aircraft accidents. The brainchild of Brazilian federal judge Marcelo

Continued on Page 6

New Expedited-Action Rule Provides Mandatory Fast Track to Trial

by Steven Dimitt

The Texas Supreme Court's new addition to the Texas Rules of Civil Procedure includes two words that usually strike fear into the hearts of lawyers: mandatory and expedited. In response to the Texas Legislature's request for "rules to promote the prompt, efficient, and cost-effective resolution of civil actions," the Texas Supreme Court proposed Texas Rule of Civil Procedure 169, titled "Expedited Actions." The new rule, commonly referred to as the "expedited-action rule," provides significant limitations on discovery and trial procedures for plaintiffs seeking monetary relief of $100,000 or less. Despite significant opposition by plaintiffs' attorneys, defense attorneys, and mediators, the new expedited-action rule took effect on March 1, 2013.

The new expedited-action rule applies to suits in which a plaintiff seeks only monetary relief totaling $100,000 or less, which includes penalties, costs, expenses, and attorneys' fees. This rule does not apply to claims governed by the Family Code, Property Code, Tax Code, or Chapter 74 of the Civil Practice and Remedies Code (health care liability claims). The rule limits a plaintiff's recovery to $100,000, plus post-judgment interest. However, this cap does not apply to counter-plaintiffs seeking damages in excess of $100,000.

The recent additions and amendments to the Texas Rules of Civil Procedure provide new pleading requirements. Under amended Rule 47, plaintiffs and counter-plaintiffs must include within their pleadings a statement that the value of their claims are either: (1) $100,000 or less, (2) $100,000 or less and request non-monetary relief, (3) between $100,000 and $200,000, (4) between $200,000 and $100,000, or (5) exceed $1,000,000. These statements are *inclusive* of all damages including penalties, costs, expenses and attorneys' fees. No discovery may be conducted until the pleading contains the above damages statement. The new expedited-action rule only pertains to plaintiffs seeking damages of $100,000 or less under category (1). Additionally, there is no mechanism in the new rule for an opposing party to contest the truthfulness or accuracy of the allegations with respect to the amount in controversy other than the requirement that all pleadings must not contain false information under Rule 13 of the Texas Rules of Civil Procedure.

A suit can only be removed from the expedited-action process in limited circumstances. Under the rule, a defendant may file a counterclaim in excess of $100,000. However, filing a counterclaim in excess of $100,000 will not automatically remove a case from the confines of the expedited-action rule. The defendant must show that there is good cause for the case to be removed. The Texas Supreme Court included this requirement to prevent defendants from simply filing counterclaims seeking damages in excess of $100,000 for the sole reason of removing the case from the expedited-action process. The comments to the new rule offer guidance on whether good cause exists for removal of a case from the expedited-action process, including: (1) whether the damages sought by multiple plaintiffs against the same defendant total more than $100,000, (2) whether a defendant has filed a compulsory counterclaim in good faith that exceeds $100,000, (3) the number of parties and witnesses, (4) the complexity of the legal and factual issues, and (5) whether an interpreter is necessary. Additionally, a suit will also be removed from the expedited-action process if a claimant, other than a counter-claimant, files an amended pleading seeking either non-monetary relief or monetary relief in excess of $100,000. Thus, a plaintiff can amend his pleading to remove the case from expedited-action process.

The expedited-action rule also limits the scope of discovery. Under the new rule, each party may serve only 15 interrogatories, 15 requests for production, and 15 requests for admissions. This is a reduction from previous discovery rules that only limited interrogating requests to 25. Additionally, each party may use only six total hours to depose all witnesses. Absent a court order, the parties may only agree to extend this total to 10 hours. The discovery period, also limited by the new rule, ends 180 days after the first request for discovery is served. Many opponents of the new rule argue that the discovery limitations are too restrictive and will prevent lawyers from fully developing their case. However, the Texas Supreme Court wanted to reduce the expense and delay of discovery in civil cases, which it found to be one of the biggest complaints among all parties.

The original version of the expedited-action rule provided that neither the parties nor the court could force mediation absent a contractual obligation to mediate. However, after a significant amount of comments and backlash from attorneys and mediators, the Texas Supreme Court revised the section of the expedited-action rule pertaining to ADR. The current version now provides that *unless the parties have agreed not to engage in ADR*, a court *may* refer the case to an ADR procedure: (1) not to exceed a half-day in length, (2) not to exceed a total cost of twice the amount of the applicable civil filing fees, and (3) to be completed no later than 60 days before the initial trial setting. The court must also consider objections to ADR unless prohibited by statute.

Parties will find themselves on the eve of trial much quicker under the new expedited-action rule. Upon a party's request, the court must set a trial date that

Continued on Page 6

See more Aviation articles at www.jw.com/publications.

Judge David Folsom Shares His Insights on Eastern District Juries

The Honorable David Folsom, former Chief Judge of the U.S. District Court for the Eastern District of Texas, recently joined Jackson Walker as a partner and head of the firm's new Texarkana office. In his 17 years on the bench, Judge Folsom conducted over 250 trials, presided over hundreds of patent cases, and held approximately 75 claim construction hearings.

In that time, Judge Folsom developed a deep understanding of the thoughts, tendencies, and preferences of Eastern District juries through his distinctive practice of post-trial interviews with jurors. In the following Q&A, Judge Folsom shares some of the insights he gained through that process.

Q: What struck you as most interesting about Eastern District juries?
A: Early in my career, I began the practice of interviewing jurors after the verdict was reached. I made it clear that I was not going to question them about the verdict; that was not the purpose of my visit, but rather that I wanted to express my appreciation to them for serving on the panel and to answer any questions about the process. I found this practice fascinating, and I never had any controversy or appellate issues arise as a result of the interview. What impressed me so much over 15 or 16 years interviewing dozens of jurors was the great effort they put into reaching the right decision and how important that was to them. In one case, they had a chart tacked to the wall with all of the pros and cons they had explored in reaching their verdict; it was so interesting to see the work that went into their decision-making process. I have tremendous respect for the jury system and have always been impressed with how hard jurors worked to reach the right verdict. In all the trials of my career, I only set aside one jury verdict.

Q: How have Eastern District juries changed?
A: I think it's not so much that juries have changed philosophically, but that defense lawyers have become smarter and more strategic in trying these cases and in allowing skilled trial lawyers to play a bigger role. I have seen lawyers more familiar with the jury pool getting more involved with jury selection, for example. If you're going to use local counsel, I think it's wise to let them participate in the trial, but it's always a tough call: Do you take a team of 20 lawyers into the courtroom and impress upon the jury how important the case is? Or do you go solo or with a smaller trial group? Those are all decisions that need to be made in forming a trial team.

Q: What kind of feedback did you get about lawyers from the jury?
A: One thing that would consistently drive juries crazy is when a lawyer would repeat the same question in 10 or 12 different fashions. That almost always insults the jury's intelligence, and it's the No. 1 complaint I've heard over the years – and I've heard everything. Juries pick up on things very quickly, and sometimes it's the smallest things: lawyers jingling change in their pockets, or using their cellphones to check on stock quotes and e-mails when the jury had been asked to put their cellphones away. In terms of positive feedback, they liked lawyers who were able to get to the point quickly and concisely. They also appreciated lawyers who conducted themselves professionally and showed respect for the judge and the process. Credibility was a huge factor – if you lose your credibility with jury – or judge – your case is lost.

Q: What are some issues that are, perhaps, very important to lawyers but less so to juries?
A: Whether a plaintiff is an NPE [non-practicing entity] is generally a big factor for defense lawyers, but I did not see that it mattered a lot to the jury. Also, I never heard a jury comment on how many times an expert witness had previously testified. Jurors were often shocked by the compensation paid to experts, but that didn't seem to influence their decision.

Q: From a judge's perspective, what tips would you give lawyers to be more effective in the courtroom?
A: You win so much goodwill with a judge, and especially his or her staff, when you act in a professional manner. On your motions and briefings, keep them brief. Choose your best two or three issues, and go with those. Judges or law clerks do have to read them, and it never ceased to amaze me when lawyers would cite cases that didn't stand for the proposition cited. That sort of thing costs you credibility with the court, and it's difficult to regain. Discovery abuses are another area where you can easily lose credibility. In preparing experts, they should not exhibit an entirely different personality when they go from direct to cross-examination. You often see a similar problem in claim construction. When lawyers completely shift their philosophy of claim construction and do a 180-degree turnaround, that can cost them credibility. But consistency requires courage: If you have no defense to infringement, but you have a good case for invalidity, it takes a lot of courage to admit infringement and try the case on invalidity. In short, be professional. Be reasonable. Choose your battles, and only fight the ones that are worth fighting.

McIntyre is incorporated in England. It had never marketed its goods in New Jersey or shipped them to New Jersey. But J. McIntyre had marketed its goods nationally in the U.S. and its representatives had attended trade shows in other states. McIntyre Machinery America, Ltd. ("McIntyre America"), an independent distributor not under J. McIntyre's control, sold J. McIntyre's products in the United States. Ultimately, the New Jersey Supreme Court held that jurisdiction was proper because "the injury occurred in New Jersey; because [J. McIntyre] knew or reasonably should know that its products are distributed through a nationwide distribution system that might lead to those products being sold in any of the fifty states; and because [it] failed to take reasonable steps to the prevent the distribution of its products [in New Jersey]."

The Supreme Court disagreed. Six Justices concluded that personal jurisdiction over an out-of-state manufacturer is improper where a manufacturer sells its products nationwide and a single product is sold in the forum state. Justice Kennedy authored a plurality opinion in which Chief Justice Roberts and Justices Scalia and Thomas joined. For Justice Kennedy, the "principal inquiry" is whether "the defendant's activities manifest an intention to submit to the power of a sovereign." He announced that he disagreed with Justice Brennan's formulation of "stream-of-commerce" theory, which he characterized as based on fairness and foreseeability rather than on a defendant's actions, and that his opinion is "consistent with Justice O'Connor's *Asahi*." In response to Justice Ginsberg's dissent (discussed below), he also concluded that J. McIntyre's contacts with the U.S. generally did not allow it to be subject to personal jurisdiction in New Jersey.

Justice Breyer, joined by Justice Alito, concurred in the judgment. He agreed that a nationwide marketing plan and a single sale of a product into a state is insufficient to assert jurisdiction. For that reason, he believed the exercise of jurisdiction was improper on the record before him. He also criticized Justice Kennedy's opinion as "making broad pronouncements that refashion basic jurisdictional rules." But he did not identify how the rules were being "refashioned." Further, he tried to strike a sort of middle ground. He stated that he "do[es] not agree with the plurality's seemingly strict no-jurisdiction rule" but also does not agree with the "absolute approach adopted by the New Jersey Supreme Court." Justice Breyer declined to provide any more guidance because the record left "many open questions" and because he was concerned how broad statements might be applied in the context of modern commerce.

The plurality seems to state strict rules that limit jurisdiction where a defendant does not "inten[d] to submit to the power of a sovereign" and cannot "be said to have targeted the forum." But what do these standards mean when a company targets the world by selling its products from its website? And does it matter if, instead of shipping the products directly, a company consigns products through an intermediary who then receives and fulfills the orders? And what if the company markets its products through popup advertisements that it knows will be viewed in a forum? Those issues have serious commercial consequences but are totally absent in this case.

Justice Ginsburg, joined by Justices Sotomayor and Kagan, dissented. On account of J. McIntyre's regular contacts with the United States as a whole, Justice Ginsburg believed that New Jersey, the state where Nicastro was injured, was "entirely appropriate" for the adjudication of his claim. She contended that Justice Kennedy's opinion allows an out-of-state manufacturer to "escape" jurisdiction simply by engaging a U.S. distributor to handle sales and shipments within the United States. She observed that J. McIntyre had at least annual contacts with the United States generally and that its particular industry (scrap metal) had a large presence in New Jersey. Because many marketing arrangements for sales in the United States treat the country as a whole, she concluded that it is unfair and inappropriate to rely on a test for jurisdiction that focuses solely on activities directed toward one specific state rather than the country as a whole.

Based on *Nicastro*, it is unclear how the Supreme Court might rule in other contexts. Though it may seem at first blush that six Justices reject consideration of "nationwide contacts," Justice Ginsburg essentially invited Justices Breyer and Alito to join her, stating that "assigning weight to the local or international stage on which the parties operate would, to a considerable extent, answer the concerns expressed by Justice Breyer."

Finally, *Nicastro* has implications for domestic manufacturers selling their products in other states. Although *Nicastro* involved a foreign manufacturer, as Justice Kenney pointed out, these jurisdictional principles apply equally to domestic manufacturers selling their products in other states. Thus, in order to manage risk and prepare for the possibility of litigation, foreign and out-of-state manufacturers must understand how these jurisdictional rules might be applied. Manufacturers should consult with counsel to identify the jurisdictions where they may be subject to suit and discuss ways to limit their exposure.

Concorde Crash...Continued

Honorato, who had previously been a general aviation accident investigator, the course has been presented three times. Honorato's double role as both a judge and safety investigator helps give him unique perspective in this area.

The program emphasized the differing objectives between safety and criminal investigations, the risk of using safety recommendations as proof of who is to blame, and the importance of confidential interviews and safety recommendations. Honorato offers a legal justification for such confidentiality: "The court system protects a number of legal goods, the greatest of which is human life. If needful to protect that greatest good, lesser purposes such as punishment can be set aside." This sentiment has not been embraced by all of Brazil's legal community. For instance, at a debate in June 2012, several ranking São Paulo prosecutors cited laws, precedents, and the Brazilian constitution in support of their claim that no information can be kept from a prosecutor who asks for it.

The decision in France and the educational efforts in Brazil are recent steps forward for those in the industry who worry aviation safety will be jeopardized by prosecutorial overreach in the criminalization of aviation accidents. Both of these events illustrate the tension between two widely differing viewpoints – as well as the potential for reconciliation.

Expedited Action...Continued

is within 90 days of the conclusion of the discovery period. Therefore, many cases could be set for trial within nine months from the filing of the plaintiff's petition. The court may issue two continuances in a case. However, those continuances, combined, cannot exceed a total of 60 days.

Once the trial commences, trial practice is also limited under the expedited-action rule. Under the new rule, each side is allowed only 8 hours to complete jury selection, opening statements, closing arguments, presentation of evidence, and examination of all witnesses, including *Robinson/Daubert* challenges to admissibility of expert testimony. These time limitations are per side, not per party. The trial court may extend the time limit to 12 hours per side, if a party shows good cause. However, the court has no discretion to extend the limits beyond that point. Additionally, pretrial *Robinson/Daubert* expert challenges are not allowed. These challenges may only be made at trial or as an objection to summary judgment evidence.

The expedited-action rule was intended to provide plaintiffs with a more affordable route to the courthouse. However, the confines of the new rule will provide additional pressure for plaintiffs, defendants, and the judicial system. Time will tell whether litigators can adapt to this new streamlined practice of law.

Jackson Walker Aviation Partners

Brad Brown
bbrown@jw.com
214.953.5819

David Moran
dmoran@jw.com
214.953.6051

Bob Ruckman
rruckman@jw.com
214.953.6024

Katherine Staton
kstaton@jw.com
214.953.6015

Jim Struble
jstruble@jw.com
214.953.5670

About the Authors

Andrew D. Graham

901 Main Street • Suite 6000 • Dallas • 214.953.5949 • agraham@jw.com

Andrew D. Graham is a partner in the Litigation section of Jackson Walker. Mr. Graham's practice principally focuses on complex litigation in both trial and appellate courts. He was named by Thomson Reuters as a "Rising Star" in the Texas legal community in 2007-2009 and 2011-2012.

Mr. Graham received his B.A., *summa cum laude*, from Southern Methodist University, where he was inducted into Phi Beta Kappa and the Hyer Society. He received his M.A. from the University of Chicago, M.St. from Oxford (Oriel College), and J.D. from The University of Texas School of Law.

David Folsom

6004 Summerfield Drive • Texarkana • 903.255.3250 • dfolsom@jw.com

David Folsom is a partner in the Litigation section of Jackson Walker. As former Chief Judge of the United States District Court for the Eastern District of Texas, Judge Folsom brings his expertise and insight to cases both in and out of the Eastern District. He is involved with the firm's intellectual property litigation matters. He also focuses his practice on mediation and arbitration, specifically in mediating patent and complex commercial cases

Mr. Folsom received his B.A. from the University of Arkansas and his J.D. from the University of Arkansas School of Law.

Seth Johnson

901 Main Street • Suite 6000 • Dallas • 214.953.6065 • jsjohnson@jw.com

Seth Johnson is an associate in the Litigation section at Jackson Walker. During law school, Mr. Johnson was a legal intern for Judge Graham Calder Mullen of the United States District Court for the Western District of North Carolina, where he researched and analyzed various federal legal issues and drafted memorandum and initial opinions. Mr. Johnson also has a private pilot's license.

Mr. Johnson received his B.S., *magna cum laude*, from the University of North Carolina Wilmington, and his J.D. from the University of Virginia School of Law.

Steven Dimitt

901 Main Street • Suite 6000 • Dallas • 214.953.6182 • sdimitt@jw.com

Steven W. Dimitt is an associate in the Litigation practice group at Jackson Walker. He has represented clients in a broad range of matters including commercial litigation, premises liability, and products liability. His practice primarily focuses on commercial litigation, with an emphasis on contract disputes, securities, banking, and employment matters. Before attending law school, he was a commercial banking financial analyst, where he evaluated the financial viability of numerous corporations.

Mr. Dimitt received his B.B.A. from Texas Tech University and his J.D., *cum laude,* from the Southern Methodist University Dedman School of Law.

Austin
100 Congress Avenue, Suite 1100
Austin, Texas 78701
512.236.2000 · 512.236.2002 (fax)

Dallas
901 Main Street, Suite 6000
Dallas, Texas 75202
214.953.6000 · 214.953.5822 (fax)

Fort Worth
777 Main Street, Suite 2100
Fort Worth, Texas 76102
817.334.7200 · 817.334.7290 (fax)

Houston
1401 McKinney Street, Suite 1900
Houston, Texas 77010
713.752.4200 · 713.752.4221 (fax)

San Angelo
301 W. Beauregard Avenue, Suite 200
San Angelo, Texas 76903
325.481.2550 · 325.481.2552 (fax)

San Antonio
112 E. Pecan Street, Suite 2400
San Antonio, Texas 78205
210.978.7700 · 210.978.7790 (fax)

Texarkana
6004 Summerfield Drive
Texarkana, TX 75503
903.255.3250 · 903.255.3265 (fax)

JW | JACKSON WALKER L.L.P.

901 Main Street, Suite 6000
Dallas, Texas 75202

www.jw.com · Texas Based. Global Reach.™