

**AVOID LANDING IN THE WRONG COURT:
GETTING YOUR CASE SAFELY TO ITS CORRECT DESTINATION**

- 1) Demographic make-up of the venue
 - a) Federal vs. State
 - b) Do this early
 - c) Factors to consider:
 - i) Socio-economics
 - ii) Religion
 - iii) Ethnicity
 - iv) Education
 - v) Age
 - vi) Politics
 - d) Trends
 - i) How has demographics in the venue changed over the past 5 years?
 - ii) Is it likely to change?
 - (1) Ever?
 - (2) During your case?
 - e) Analyze prior jury verdicts with facts similar to your case
- 2) Trier of fact
 - a) Political leaning?
 - b) Appointed or elected?
 - c) Background?
 - i) Easy places to look: social media
 - d) Does this person tend to favor judicial activism?
 - e) Analyze prior verdicts
 - f) Determine if this judge typically tries these types of cases
- 3) Motions to Transfer
 - a) Timing of a motion and appeal
 - b) Specific rules (e.g., Texas Civil Practice and Remedies Code 15.003)
 - c) Dealing with defendants who are:
 - i) Individuals vs. Companies
 - ii) Domestic vs. Foreign
 - d) How does having multiple defendants affect these motions?